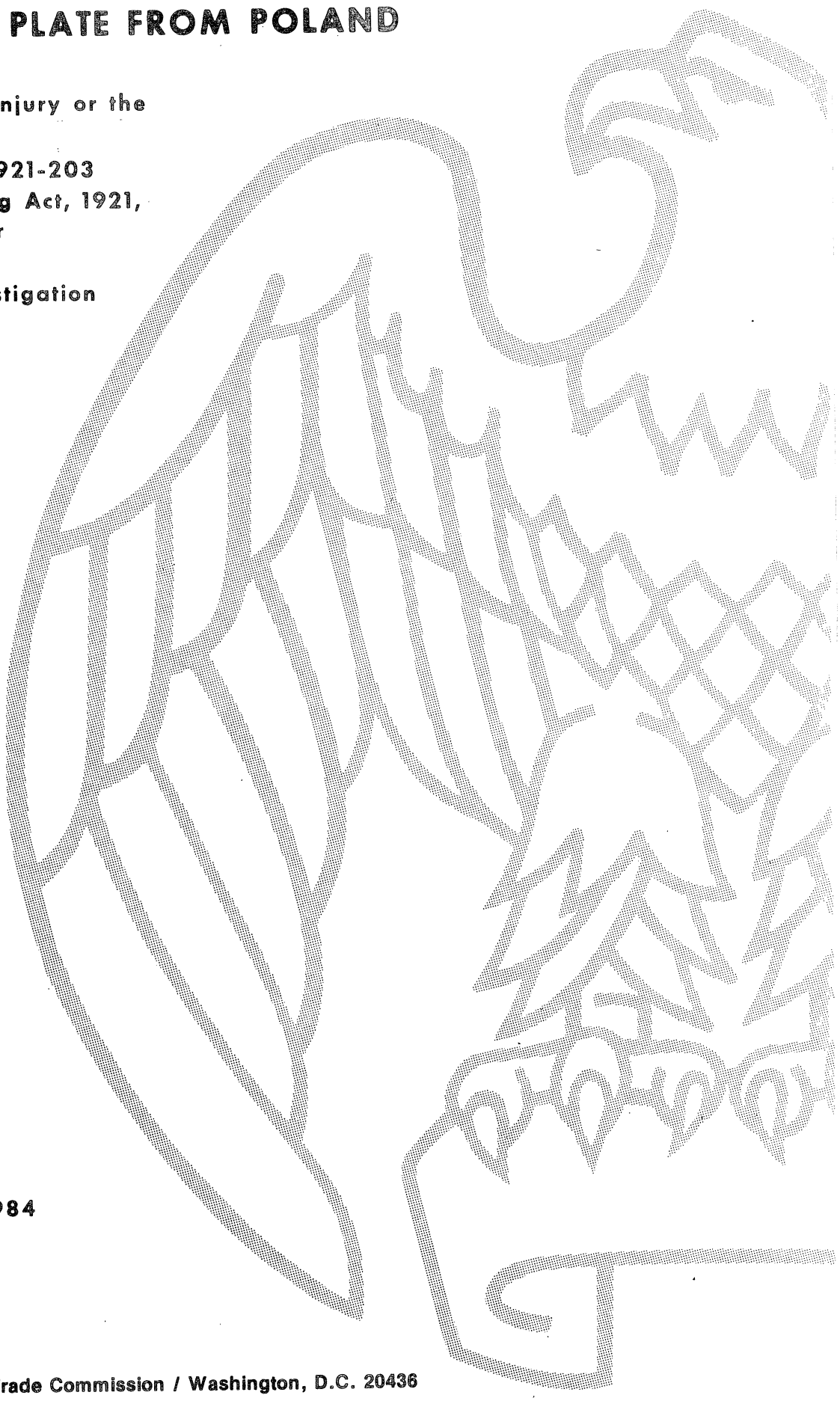
CARBON STEEL PLATE FROM POLAND

Determination of No Injury or the Likelihood Thereof in Investigation No. AA1921-203 Under the Antidumping Act, 1921, as Amended, Together With the Information Obtained in the Investigation



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UNITED STATES INTERNATIONAL TRADE COMMISSION

COMMISSIONERS

Joseph O. Parker, Chairman
Bill Alberger, Vice Chairman
George M. Moore
Catherine Bedell
Paula Stern

Kenneth R. Mason, Secretary to the Commission

This report was prepared principally by
Bruce Cates, Investigator
Office of Operations

assisted by

William Gearhart
Office of the General Counsel

Lynn Featherstone, Acting Supervisory Investigator

Address all communications to
Office of the Secretary
United States International Trade Commission
Washington, D.C. 20436

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Note.--Information which would disclose confidential operations of individual concerns may not be published and therefore has been deleted from this report. Deletions are indicated by asterisks.

UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, D.C.

[AA1921-203]

CARBON STEEL PLATE FROM POLAND

Determination

On the basis of the information obtained in the investigation, the Commission unanimously determines (Chairman Parker not participating) that an industry in the United States is not being and is not likely to be injured, and is not prevented from being established, by reason of the importation of carbon steel plate from Poland, which the Department of the Treasury has determined is being, or is likely to be, sold at less than fair value within the meaning of the Antidumping Act, 1921, as amended (19 U.S.C. 160(a)).

Background

On April 17, 1979, the United States International Trade Commission received advice from the Department of the Treasury that carbon steel plate from Poland is being, or is likely to be, sold in the United States at less than fair value within the meaning of the Antidumping Act. Accordingly, on April 27, 1979, the Commission instituted investigation No. AA1921-203 under section 201(a) of said act to determine whether an industry in the United States is being or is likely to be injured, or is prevented from being established, by reason of the importation of such merchandise into the United States.

Notice of the institution of the investigation and of the public hearing held in connection therewith was published in the Federal Register of May 3, 1979, (44 F.R. 25949). The public hearing was held in Washington, D.C., on May 24, 1979, and all persons who requested the opportunity were permitted to appear in person or by counsel.

In arriving at its determination, the Commission gave due consideration to all written submissions from interested persons and information adduced at the hearing, provided by the Department of the Treasury, and obtained by the Commission's staff from questionnaires, personal interviews, and other sources.

STATEMENT OF REASONS OF COMMISSIONERS BILL ALBERGER AND PAULA STERN

On the basis of information obtained in this investigation, we determine that an industry in the United States is not being and is not likely to be injured and is not prevented from being established [1/] by reason of the importation of carbon steel plate from Poland, which the Department of the Treasury (Treasury) has determined is being, or is likely to be, sold at less than fair value (LTFV). Our determination would be the same whether the industry is considered national or regional in scope, and whether LTFV imports from Poland are considered separately or cumulated with LTFV sales from Taiwan, which we found not to cause injury in a prior investigation. [2/]

The Imported Article And The Domestic Industry

Carbon steel plate, the subject of this investigation, is a finished steel mill product which is used in the manufacture of boilers, storage tanks, railway cars, ships, nonelectric machinery and nonresidential construction. A like class of merchandise is produced in the United States, principally by twelve U.S. firms. We consider the relevant industry to consist of those facilities in the United States devoted to the production of carbon steel plate. We have also considered arguments put forth by counsel for various domestic producers that we apply a geographic segmentation principle in defining the relevant industry. Our discussion of the question of regional injury follows our examination of the factors relating to the national industry.

1/ Prevention of the establishment of an industry is not an issue in this investigation and will not be discussed further.

2/ See Carbon Steel Plate from Taiwan, Inv. AA1921-197 (USITC Pub. 970).

LTFV Sales

The Treasury investigation covered exports from Poland between August 1, 1978 and September 30, 1978. The investigation covered only one firm -- Stalexport -- which accounted for 100 percent of all exports of carbon steel plate from Poland to the United States. Treasury announced that the weighted average LTFV margin for sales of carbon steel plate by Stalexport amounted to 8.53 percent.

No Injury By Reason Of LTFV Sales

A number of economic factors suggests that the U.S. carbon steel plate industry is recovering from the downturn in 1975-76, and from the injury which the Commission found to be caused by LTFV sales from Japan in 1977.[1/] An analysis of these factors indicate clearly that the industry could not be suffering injury from the small percentage of import penetration achieved by Polish LTFV sales.

Imports of carbon steel plate from Poland (excluding slab) were about 121,000 short tons in 1978, compared to about 66,000 short tons in 1977. Even though Polish imports nearly doubled in 1978, they represented only 1.4 percent of domestic consumption.[2/] Moreover, imports from Poland for the first quarter of 1979 were 75 percent below the levels for the same quarter of 1978.

While the market share for Polish imports remains quite low, apparent U.S. consumption continues to grow. Figures show consistent growth since the 1976 low of 6.8 million short tons. In fact, apparent consumption

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1/ See Carbon Steel Plate from Japan, Inv. AA1921-179 (USITC Pub. 882).

2/ When Polish imports are cumulated with those from Taiwan, the import penetration ratio amounts to 2.5 percent.

for 1978 of 8.5 million short tons was close to 1973-74 levels, when record consumption was achieved.

Shipments of carbon steel plate by domestic producers have also steadily increased since 1976. In fact, shipments of 6.6 million short tons in 1978 represent an increase of 17.5 percent in only two years. In 1978, the year in which the LTFV imports from Poland occurred, shipments by domestic producers increased by twelve percent from the previous year.

Capacity utilization has steadily improved since 1976, when the industry experienced idling of productive facilities. In addition, new capacity was brought on stream by Bethlehem Steel Corp. in 1978. Thus, both capacity and utilization of capacity are increasing.

Employment of production and related workers producing carbon steel plate has remained relatively steady since 1976. There was a serious reduction in the work force in the period 1974 to 1976, accounted for in part by the closure of Alan Wood Steel Corporation's plate mill. However, some of these jobs will soon be filled when the mill reopens later this year.

Another factor indicating improvement in the domestic industry is profitability. In 1978, the year when the LTFV sales occurred, the industry operated profitably for the first time in four years. Overall, profitability is still only 2.4 percent, but most firms report a steady improvement in their profit picture. This improved profitability is partly a result of higher prices charged by U.S. producers. Domestic prices have

remained high, arguably as a result of the institution of the Trigger Price Mechanism. Moreover, the Commission has no information which indicated price suppression by domestic producers in an attempt to counter prices of Polish carbon steel plate.

Finally, no information was supplied to the Commission which indicated that purchasers of Polish plate would have purchased goods from domestic suppliers absent LTFV sales. Hence, we cannot verify specific transactions as lost sales for domestic producers.

We also find no likelihood of future injury in this case. The positive trends in shipments, consumption and profits, and the decreased shipments of carbon steel plate to the United States from Poland in 1979 strongly argue against a finding of likelihood of injury. Information received by the Commission indicates a decline in future orders for Polish steel from U.S. customers in 1979.

Regional Considerations

Arguments for application of the geographic segmentation principle in this case were offered at the Commission's hearing. We have considered these arguments and have concluded that our determination would not be affected. Only one of the regions identified at the hearing, namely the South Central United States, appears to meet the criteria we established for geographic segmentation in Carbon Steel Plate from Taiwan.[1/] That region appears to be separate and identifiable; the LTFV sales are concentrated in that region; and the region constitutes a significant portion of

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1/ See Carbon Steel Plate from Taiwan, Inv. AA1921-197 (USITC Pub. 970).

the domestic industry. However, we are unable to find that the region itself is being injured by reason of the LTFV sales. While imports from Poland accounted for 2.7 percent of consumption within that region in 1978, our information indicates that the three domestic suppliers within that region were significantly more profitable than the rest of the industry. In fact, profits for the region were higher than the national average. Moreover, we have no further indication that the region has suffered a disproportionate impact from LTFV sales. Absent other indications of problems affecting the industry located in the South Central United States, we cannot say that a slightly higher import penetration ratio justifies an injury finding.

Conclusion

On the basis of the above considerations we are of the opinion that the domestic industry is not being injured and is not likely to be injured by reason of LTFV sales from Poland. 1978 was a year of marked improvement, and all indications are that conditions will continue to improve. While profits and capacity utilization remain somewhat lower than for other sectors of the economy, we cannot attribute this to the LTFV sales from Poland. Moreover, the overall profit picture is up, and only a few firms have been unable to restore their profitability. With respect to these firms, the low market penetration achieved by Polish imports of carbon steel plate could not have been a causal factor. In any event, figures for capacity utilization, shipments, employment, and consumption all point clearly toward a negative determination.

STATEMENT OF REASONS FOR THE NEGATIVE DETERMINATION
OF COMMISSIONERS GEORGE M. MOORE AND CATHERINE BEDELL

On April 17, 1979, the U.S. International Trade Commission received advice from the Department of the Treasury that carbon steel plate from Poland produced by Stalexport is being, or is likely to be, sold in the United States at less than fair value (LTFV). Accordingly, on April 27, 1979, the Commission instituted investigation No. AA1921-203 under section 201(a) of the Antidumping Act, 1921, as amended (19 U.S.C. 160(a)), to determine whether an industry in the United States is being or is likely to be injured, or is prevented from being established, by reason of the importation of such merchandise into the United States.

Determination

On the basis of information obtained in this investigation, we determine that an industry in the United States is not being and is not likely to be injured and is not prevented from being established 1/ by reason of the importation of carbon steel plate from Poland, which the Department of the Treasury (Treasury) has determined is being, or is likely to be, sold at less than fair value.

The imported article and the domestic industry

Carbon steel plate is a finished steel mill product which is used principally in the manufacture of boilers, storage tanks, railway cars, ships, and nonelectric machinery. It also is used extensively in various construction projects including pipelines, bridges, and nonresidential

1/ No party alleged that imports of such merchandise prevented an industry from being established, and we are unaware of any information relating to this issue. Therefore, this issue will not be discussed further in this statement.

buildings. Treasury's determination of sales at LTFV from Poland excluded imports of hot-rolled slab more than 6 inches in thickness, which are classified as plate for U.S. tariff purposes. This material is a semifinished product that is not directly competitive with finished plate. Accordingly, data in the Commission report and in this statement relating to the importation of carbon steel plate exclude this slab, except as noted.

LTFV sales

Treasury's investigations of exports of carbon steel plate from Poland and Taiwan covered the 2-month period extending from August 1, 1978, through September 30, 1978. The Polish investigation involved only one firm--Stalexport--which accounted for 100 percent of the exports of carbon steel plate from Poland. On April 17, 1979, Treasury announced that it had found LTFV margins on 82 percent of the exports by Stalexport to the United States and that the weighted average LTFV margin on all exports was 8.53 percent.

No injury by reason of LTFV imports

Imports and market share. -- It is our view that LTFV sales of carbon steel plate from Poland in recent years have not accounted for a significant share of carbon steel plate consumption in a regional market or in the United States as a whole. As a share of total U.S. consumption, carbon steel plate imported from Poland represented only 0.8 percent in 1976 and 1.4 percent in 1978 as compared with 18.1 percent for all carbon steel plate imports in 1976 and 23.4 percent in 1978. Even in the South-Central marketing area, where more than one-half of total carbon steel plate imports from Poland were entered in 1978, such imports represented only 2.7 percent of domestic consumption in that region in 1978. In the East North-Central marketing

area, where 21 percent of carbon steel plate from Poland was entered in 1978, such imports accounted for only 0.8 percent of domestic consumption in 1978. If the two regions are combined into a single South-Central - East North-Central region, such imports accounted for only 1.7 percent of domestic consumption in 1978. 1/

Prices.--Prices paid to U.S. producers for carbon steel plate increased considerably in recent years, a fact substantiated not only by confidential data supplied to the Commission in questionnaires, but also by the producer price index compiled and published by the Bureau of Labor Statistics. Historically, domestic carbon steel plate prices have tended to remain above the price of the imported product, and in 1978, the institution of the trigger-price mechanism helped to firm up prices in the market place to a level at or slightly above the announced trigger price. In addition, the margin by which imports from Poland undersold U.S.-produced plate, in sales made to distributors, generally declined during 1978. In sales made to end users, prices for U.S.-produced plate and those for Polish plate were generally comparable during 1977 and 1978.

Lost sales.--Some producers provided lists of customers whom they believed had purchased carbon steel plate from Poland. The Commission was unable to establish that such firms would have purchased these goods from domestic suppliers absent LTFV sales from Stalexport, and therefore we cannot characterize these as verified lost sales attributable to LTFV sales of Polish imports.

1/ The regions are defined on p. A-19 of the report.

No likelihood of injury

The decreased shipments of carbon steel plate to the United States from Poland in 1979 mitigate against a finding of likelihood of injury. Also, information received by the Commission indicates that orders for Polish plate from U.S. customers in 1979 are well below the level in 1978.

The question of cumulation

In making our determination, we have considered the impact of cumulated Polish and Taiwanese LTFV sales on the U.S. industry producing carbon steel plate and on their facilities located in the aforementioned regional marketing areas where such LTFV sales were concentrated. Even when combined with LTFV sales from Taiwan, the total of LTFV sales from Poland and Taiwan did not account for a significant share of sales in a regional market or in the United States as a whole. 1/ For example, in 1978, cumulation results in an increased penetration of only 1.1 percent on a national basis, 0.5 percent in the East North-Central region, 1.0 percent in the South Central region, and 0.6 percent in a combined South-Central - East North-Central region.

We did not find any basis upon which to support the cumulation of similar LTFV sales from Japan which were the subject of investigation No. AA1921-179, Carbon Steel Plate From Japan, and which the Department of the Treasury found to exist during the period October 1, 1976 - March 31, 1977. 2/

1/ LTFV sales from Taiwan were, of course, a significant factor in the West Coast regional market, as we stated in our Statement of Reasons in investigation No. AA1921-197, Carbon Steel Plate From Taiwan. There were no LTFV sales of Polish plate in the west coast marketing area.

2/ USITC Publication 882, April 1978.

Conclusion

On the basis of the foregoing considerations, we believe that an industry in the United States is not being injured and is not likely to be injured, and is not prevented from being established, by reason of LTFV sales from Poland.

SUMMARY

On April 17, 1979, the United States International Trade Commission received advice from the Department of the Treasury that carbon steel plate from Poland is being, or is likely to be, sold in the United States at less than fair value (LTFV) within the meaning of the Antidumping Act, 1921, as amended. Accordingly, on April 27, 1979, the Commission instituted investigation No. AA1921-203 under section 201(a) of said act to determine whether an industry in the United States is being or is likely to be injured, or is prevented from being established, by reason of the importation of such merchandise into the United States. For the purpose of its determination concerning LTFV sales, Treasury defined "carbon steel plate" as hot-rolled carbon steel plate, not coated or plated with metal and not clad, other than black plate, not alloyed, and other than in coils. This merchandise enters the United States under item 608.8415 of the Tariff Schedules of the United States Annotated (TSUSA). The coverage of the determination by Treasury excludes hot-rolled slabs greater than 6 inches in thickness, which also entered the United States under item 608.8415 of the TSUSA. Import data in the text of this report exclude slab, except as noted.

Treasury's determination of sales at LTFV resulted from an investigation initiated in conjunction with its administration of the trigger-price mechanism, a program established to monitor prices at which certain steel mill products enter the United States. The investigation by Treasury covered exports to the United States from Poland during the 2-month period from August 1, 1978, through September 30, 1978. One firm, Stalexport, accounted for 100 percent of the exports of carbon steel plate from Poland to the United States during the investigatory period. Since Poland is considered to be a state-controlled-economy country, Treasury's basis for comparison was the purchase price of Stalexport's sales to the United States and the home-market price of such or similar merchandise manufactured in a third country (Spain). On April 17, 1979, Treasury announced that fair-value comparisons on 100 percent of Stalexport's exports to the United States during the 2-month investigation disclosed LTFV margins on 82 percent of the exports ranging from zero to 44.2 percent. The weighted average LTFV margin on all sales compared was calculated by Treasury at 8.53 percent.

Total U.S. imports of carbon steel plate not in coils fell from 1.3 million short tons in 1974 to 1.0 million short tons in 1975, and then increased to 1.2 million short tons in 1976, 1.5 million short tons in 1977, and 2.0 million short tons in 1978. Imports from Poland followed the same trend, amounting to 66,000 short tons, 37,000 short tons, 51,000 short tons, 66,000 short tons, and 121,000 short tons in the same period. Poland increased its share of total imports from about 4 percent during 1975-77 to 6 percent in 1978. Principal customs districts at which imports from Poland entered the United States include Cleveland, Houston, New Orleans, Detroit, Philadelphia, Savannah, and Chicago.

Apparent U.S. consumption declined from 10.0 million short tons in 1974 to 6.8 million short tons in 1976 but increased thereafter and in 1978 amounted to 8.5 million short tons--15 percent below the peak 1974 period and 25 percent above the low 1976 level.

Shipments by U.S. producers trended downward between 1974 and 1978. Shipments declined from 9.0 million short tons in 1974 to 6.6 million short tons in 1978. Intracompany shipments of carbon steel plate by U.S. producers fluctuated between a high of 1.2 million short tons in 1974 (13.4 percent of total sales) and a low of 434,000 short tons in 1976 (7.7 percent of total sales).

U.S. exports declined without interruption from 372,000 short tons in 1974 to 45,000 short tons in 1977 but increased in 1978 to 99,000 short tons. Principal markets for U.S. exports include Canada and the Netherlands.

Inventories of carbon steel plate maintained by U.S. producers and importers are relatively small compared with the volume of inventories held by some distributors and end users. During 1974-78, the ratio of producers' yearend inventories to shipments averaged 3 percent.

Data obtained from 10 producers, which accounted for 82 percent of total shipments of carbon steel plate in 1978, indicate that the number of production and related workers declined irregularly from 20,000 in 1974 to 15,000 in 1978. Hours worked by these employees followed a similar trend.

Nine firms, which accounted for 76 percent of total shipments of domestic carbon steel plate in 1978, responded to the Commission's request for financial data on their carbon steel plate operations only. The ratio of net operating profit or loss to net sales, as reported by these firms, declined steadily from a profit of 11.6 percent in 1974 to a loss of 3.2 percent in 1977 but increased in 1978 to a profit ratio of 2.4 percent. None of the nine responding firms reported a loss for 1974, but eight firms reported a loss for 1976. Six of the nine firms suffered losses in 1977, and five of them had losses in 1978.

Although U.S. consumption and producers' shipments trended downward between 1974 and 1978, total imports trended upward and imports from Poland nearly doubled. The ratio of imported carbon steel plate to apparent U.S. consumption increased from 13.1 percent in 1974 to 23.4 percent in 1978. Imports from Poland increased their market penetration from 0.7 percent of U.S. consumption in 1974 to 1.4 percent in 1978. Principal areas of competition between carbon steel plate from Poland and domestically produced carbon steel plate are the East North Central region of the United States, which includes Ohio, Indiana, Illinois, Michigan, Wisconsin, and Kentucky, and the South Central region, which includes Texas, Louisiana, Arkansas, Oklahoma, Mississippi, Alabama, and Tennessee.

The bulk of the merchandise imported from Poland reaches the end user only after passing through intermediates--principally distributors or warehouses affiliated with the large trading companies. Prices to distributors of carbon steel plate imported from Poland were substantially below prices of domestic plate in both 1977 and 1978. Prices of plate from Poland to end users were generally below the domestic prices during 1977, but were higher than those of the domestic product during each quarter of 1978, averaging about * * * per short ton more for the year.

Approximately 10 firms were listed by U.S. producers as customers or former customers that had purchased carbon steel plate from Poland. The Commission was able to contact half of these firms. Of the firms contacted, one used no plate at all and the remaining firms reported no decline in purchases of domestic plate. The firms which used some imported plate purchased it from Trading Companies and did not know the country of origin. However, one of the firms imported plate directly from Poland in 1977 and early 1978 not only because of the lower price but also because of the need of a backup source when the firms main source was in short supply.

INFORMATION OBTAINED IN THE INVESTIGATION

Introduction

On April 17, 1979, the United States International Trade Commission received advice from the Department of the Treasury that carbon steel plate from Poland is being, or is likely to be, sold in the United States at less than fair value (LTFV) within the meaning of the Antidumping Act, 1921, as amended (19 U.S.C. 160, et seq.). 1/ Accordingly, on April 27, 1979, the Commission instituted investigation No. AA1921-203 under section 201(a) of said act to determine whether an industry in the United States is being or is likely to be injured, or is prevented from being established, by reason of the importation of such merchandise into the United States. For the purpose of its determination concerning LTFV sales, Treasury defined "carbon steel plate" as hot-rolled carbon steel plate, not coated or plated with metal and not clad, other than black plate, not alloyed, and other than in coils. This merchandise enters the United States under item 608.8415 of the Tariff Schedules of the United States Annotated (TSUSA). The coverage of the determination by Treasury includes universal mill plate which is the "same class or kind" of merchandise as the carbon steel plate defined above, but excludes hot-rolled slabs greater than 6 inches in thickness, which also entered the United States under item 608.8415 of the TSUSA. While the material referred to by Treasury as slab is classified as plate under TSUSA item 608.8415, it is not directly competitive with plate since it is a semifinished product requiring further processing before use, and its unit value is about half that of finished plate. Throughout the text of this report, U.S. Department of Commerce data on imports of plate from Poland have been adjusted to exclude this material.

The public hearing in connection with this investigation was held in Washington, D.C., on May 24, 1979. By statute the Commission must make its determination within 3 months of its receipt of advice from Treasury or, in this case, by July 16, 1979. An administrative deadline of June 16, 1979, has been set in this case, however, owing to the data already collected in the recently concluded investigation on similar products from Taiwan (USITC Publication 970, May 1979). As a result of that investigation, the Commission determined that an industry in the United States was being injured by reason of the importation of carbon steel plate at LTFV from Taiwan (Vice Chairman Alberger and Commissioner Stern dissented, Chairman Parker did not participate). In an earlier case on carbon steel plate from Japan (USITC Publication 882, April 1978), the Commission unanimously determined (Vice Chairman Parker and Commissioner Ablondi not participating) that an industry was being injured by reason of the importation of carbon steel plate at LTFV from Japan.

Notice of the institution of the Commission's investigation and of the time and place of the public hearing was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission,

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1/ A copy of Treasury's letter to the Commission concerning LTFV sales from Poland is presented in app. A.

Washington, D.C., and at the Commission's New York office, and by publishing the original notice in the Federal Register of May 3, 1979 (44 F.R. 25949). 1/

Treasury's determination of sales at LTFV resulted from an investigation initiated in conjunction with its administration of the Trigger-Price Mechanism (TPM), a program established to monitor prices at which certain steel mill products enter the United States. 2/ Treasury's Antidumping Proceeding Notice was published in the Federal Register of February 5, 1979 (44 F.R. 7005); its Notice of Withholding of Appraisement and Determination of Sales at LTFV was published in the Federal Register of April 20, 1979 (44 F.R. 23619).

Description and Uses

Carbon steel plate is a finished steel mill product generally rolled from slabs, although some plate is rolled directly from ingots. For the purposes of this report, the term "carbon steel plate" refers to hot-rolled carbon steel plate, 0.1875 (3/16) inch or more in thickness, over 8 inches in width, not in coils, not pickled, not coated or plated with metal, not clad, other than black plate, and not pressed or stamped to nonrectangular shape which, if imported, is provided for in item 608.8415 of the Tariff Schedules of the United States Annotated (TSUSA). 3/ Carbon steel plate is used in the manufacture of many products, including storage tanks, boilers, railway cars, ships, machinery; in various types of construction, including pipelines, bridges, and nonresidential buildings; and by the automobile industry.

In a typical rolling operation a slab is brought to rolling temperature in a slab-heating furnace. Slab is generally rolled to the customer's specification. 4/ A conveyor table carries the heated slab through a high-pressure water spray, for scale removal, to the rolls of a two-high reversing roughing stand. This facility rapidly reduces the thickness of the steel as it passes back and forth between the rolls. From the roughing stand the intermediate product is moved along the conveyor to the finishing stand where the steel is brought to approximate width by rolling in one direction; it is then turned 90 degrees and rolled to its final thickness. 5/ Following the rolling operation, the plate may be trimmed, cut to length, and inspected prior to shipment.

A substantial quantity of carbon steel which conforms to the dimensional specifications mentioned above enters the United States in coils rather than

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1/ A copy of the Commission's Notice of Investigation and Hearing is presented in app. B.

2/ Additional trigger-price information is presented in app. C.

3/ For purposes of its investigation Treasury excluded carbon steel slabs which are greater than 6 inches in thickness but also enter the United States under item 608.8415 of the TSUSA.

4/ Consequently, very little, if any, plate is inventoried by the steel mill; rather, ingots or slabs are inventoried in anticipation of forthcoming rolling schedules.

5/ The type of equipment used in a plate-rolling operation is not standardized and may vary from company to company.

cut to length. Approximately 25 percent of total plate and coil imports in 1977 and 1978 consisted of carbon steel coils. Although this product might be substituted for carbon steel plate in certain applications, Treasury did not include it within the scope of its investigation. Special equipment is required to "uncoil" the coils of plate, thus limiting the interchangeability of coiled and cut-to-length plate.

Universal mill plate, however, was included in Treasury's dumping determination because there is potentially some overlap in the marketplace between universal mill plate and standard carbon steel plate. Universal mill plate differs from standard carbon steel plate in that it is rolled to width as well as thickness. In standard carbon steel plate production, the material is rolled only to thickness and the edges are sheared. Universal mill plate is commonly used in the fabrication of welded structural girders; however, in this application, sheared plate can be substituted on an equivalent basis.

Production facilities in the United States for universal mill plate are capable of producing plate as wide as 60 inches. The universal mill plate exported to the United States by Stalexport reportedly has ranged from 9 inches to 12 inches in width. Counsel for Stalexport contends that universal mill plate in this range of widths is offered for sale by only one U.S. mill east of the Rocky Mountains.

Market Participants

U.S. producers

Twelve firms, which operate approximately 30 steel mills, account for the bulk of the output of domestic carbon steel plate. Since 1974, these firms have accounted for more than 90 percent of the shipments of carbon steel plate by all U.S. producers. An additional firm, the Alan Wood Steel Corp., discontinued carbon steel-plate-rolling operations in 1978, following proceedings under Chapter 11 of the Bankruptcy Act. The mill is expected to be reopened by the Lukens Steel Co. in June 1979.

U.S. production of carbon steel plate is highly concentrated. * * *.

U.S. importers

Approximately 30 concerns imported carbon steel plate from Poland in 1978. Of these, less than one-third accounted for the bulk of the imports in that year. Carbon steel plate from Poland was entered principally by large trading houses that sold the product to their affiliated warehouses, to independent distributors and steel service centers, or, in some cases, directly to end-user accounts. In most instances, however, the imported plate reached the end users only after passing through distributors or steel service centers.

Distributors and steel service centers

Distributors and steel service centers account for a large share of the carbon steel plate marketed in the United States. There are currently about 500 distributors and steel service centers that buy and sell both domestic and imported merchandise. These firms generally service end user accounts that lack the volume to efficiently utilize direct sourcing from U.S. producers or the large-volume trading companies. Distributors and steel service centers inventory the merchandise and prepare the plate to the individual specifications of the customer. The distributors' function in the market is primarily that of servicing customers that buy in small volume; the steel service center provides additional services including the cutting, leveling, slitting, and coating of the plate. Sometimes distributors and steel service centers compete directly with domestic producers as well as the large trading companies for the end-user accounts. Steel mills usually sell in quantities of not less than a truckload (20 tons), while distributors sometimes sell in quantities of less than half a truckload. Steel service centers will sell in even smaller quantities, sometimes as small as sections of steel plate.

U.S. Tariff Treatment

Carbon steel plate is classified for customs purposes under item 608.84 of the Tariff Schedules of the United States (TSUS). The current most-favored-nation rate of duty, which is also applicable to imports from Poland, is 7.5 percent ad valorem; this rate was reduced from 8 percent ad valorem during the Kennedy round of trade negotiations and has been in effect since January 1, 1968. The statutory rate is 20 percent ad valorem. Carbon steel plate is not eligible for duty-free treatment under the Generalized System of Preferences.

Nature and Extent of Sales at Less Than Fair Value

Treasury's investigation of carbon steel plate from Poland was initiated as a result of information provided on the Special Summary Steel Invoices (SSSI's). 1/ The SSSI's indicated that carbon steel plate from Poland was being sold at prices less than the appropriate trigger price for that product. Further investigation by Treasury revealed the possibility that the subject carbon steel plate was being, or was likely to be, sold at LTFV within the meaning of the Antidumping Act, 1921, as amended.

The investigation by Treasury covered exports of carbon steel plate from Poland to the United States during the 2-month period August 1, 1978, through September 30, 1978. One firm, Stalexport, accounted for 100 percent of the exports of carbon steel plate from Poland to the United States during that period. For purposes of its determination, Treasury defined "carbon steel plate" as hot-rolled carbon steel plate, not coated or plated with metal and not clad, other than black plate, not alloyed, and other than in coils. This

1/ The import entry document required in conjunction with the trigger-price mechanism on transactions after January 1978.

merchandise is classified under item 608.8415 of the TSUSA. Stalexport requested that the product determination be modified to exclude universal mill plate, but Treasury determined that it is the "same class or kind" of merchandise as carbon steel plate. 1/ Treasury did, however, exclude from its determination hot-rolled slabs greater than 6 inches in thickness, which also entered the United States under TSUSA item 608.8415.

Since Poland is considered to be a state-controlled-economy country, Treasury's basis for comparison during the investigation was between the purchase price of Stalexport's sales to the United States and the home-market price of such or similar merchandise manufactured in a third country (Spain). On April 17, 1979, Treasury announced that fair-value comparisons on 100 percent of Stalexport's exports to the United States during the 2-month investigation disclosed LTFV margins on 82 percent of the exports ranging from zero to 44.2 percent. The weighted average LTFV margin on all sales compared was calculated by Treasury at 8.53 percent. 2/

U.S. Imports

Prior to January 1, 1977, U.S. imports of carbon steel plate, not in coils, the subject of this investigation, were not separately classified in the TSUS and therefore not reported separately in official import statistics of the U.S. Department of Commerce. On the basis of importers' responses to questionnaires during recent previous investigations on this product by the U.S. International Trade Commission, it was estimated that 78 percent of the steel plate imported in 1974 was not in coils, 76 percent imported in 1975 was not coils, and 79 percent imported in 1976 was not coils. The following table, which includes the above-mentioned estimates, shows U.S. imports of carbon steel plate, by kinds, during 1974-78.

1/ Although Treasury included universal mill plate in its determination, imports of this product are not subject to the trigger-price mechanism.

2/ * * *.

Carbon steel plate: U.S. imports for consumption, total and from Poland, by kinds, 1974-78

(Thousands of short tons)

Year	Total imports			Imports from Poland 2/
	Total	Not in coils 1/	In coils 1/	
1974	1,682	1,309	373	66
1975	1,343	1,027	316	37
1976	1,549	1,231	318	51
1977	3/ 2,050	3/ 1,540	510	3/ 66
1978	3/ 2,681	3/ 1,978	703	3/ 121

1/ Data for 1974-76 were estimated on the basis of questionnaire returns during previous investigations on carbon steel plate by the U.S. International Trade Commission.

2/ Virtually no imports from Poland were in coils.

3/ Adjusted to exclude slab.

Source: Compiled from official statistics of the U.S. Department of Commerce, except as noted.

U.S. imports of carbon steel plate, including coils and slab, as shown in table 1, app. D, increased irregularly from 1.7 million short tons, valued at $469.4 million, in 1974 to 2.8 million short tons, valued at $673.3 million, in 1978. Principal sources of these imports in 1978 included Belgium, West Germany, Poland, 1/ Canada, Spain, France, and Italy. Table 2 shows imports of carbon steel plate not in coils, but including slab, by principal sources for 1977-1978, January-March 1978, and January-March 1979. Poland supplied 6.4 percent of the total imports of this merchandise in 1977 but increased its share of the total to 13.4 percent in 1978. Poland accounted for 7.1 percent of the total imported in January-March of 1978, compared with 3.8 percent during the corresponding period of 1979.

Table 3 shows U.S. imports of carbon steel plate not in coils, but including slab, from Poland by principal customs districts for 1977 and 1978. The principal districts included Cleveland, Houston, New Orleans, Detroit, Philadelphia, Savannah and Chicago. As stated earlier, Treasury did not include hot-rolled slabs greater than 6 inches in thickness in its dumping investigation. Counsel for Stalexport has stated that 33,940 short tons of slab entered the United States from Poland under item 608.8415 of the TSUSA in 1977, and 167,452 short tons entered the United States in 1978. There were no known imports of slab over 6 inches in thickness from other countries during 1976-78. Data developed by the New York Office of the U.S. International Trade Commission during this investigation indicate that the bulk of the slab imported from Poland entered the United States through the Cleveland customs district.

1/ No carbon steel plate in coils was exported to the United States from Poland in recent years.

Factors Affecting the U.S. Supply of Carbon Steel Plate from Poland

The steel industry in Poland at present has insufficient capacity to meet its domestic requirements. 1/ However, production of crude steel in Poland is expected to increase from 20.4 million metric tons in 1979 to approximately 25 million metric tons in 1985. Most of the increased tonnage will be produced at Huta Katowice, the biggest mill in Poland, and will be used in the domestic market.

Data obtained from Stalexport and contained in the following table show that production of carbon steel plate in Poland increased annually from 4.0 million short tons in 1974 to 4.7 million short tons in 1978, or by 18 percent. Total exports of carbon steel plate from Poland declined irregularly from 498,000 short tons in 1974 to 438,000 short tons in 1978 (a decline of 12 percent), while exports to the United States increased 62 percent, rising from 72,000 short tons in 1974 to 117,000 short tons in 1978. 2/ Representatives of Stalexport stated at the Commission's public hearing that exports to the United States from that source will decline substantially in 1979 because of a decline in orders received. Approximately 80 percent of the plate exported to the United States was produced by one mill, Bierut, which began production in 1975. 3/

1/ From the statement of Professor Joel B. Dirlam, Consultant, National Economic Research Associates, Inc., New York, N.Y., before the U.S. International Trade Commission, May 24, 1979.

2/ Excludes the slab which was classified as plate in U.S. import statistics.

3/ Bierut is described in Iron & Steel Works of the World, 1977, as follows: "Coke ovens. Ironmaking plant: Blast furnace. Steelmaking plant: Open hearths and electric furnaces. Rolling mills: These include heavy plate mill (annual capacity 150,000 tons initially, 700,000 tons eventually), computerized sheet mill, and seamless tube mill."

Carbon steel plate 1/: Production in Poland, imports into Poland, total exports from Poland, and exports to the United States from Poland, 1974-78

Year	Production	Imports	Total Exports	Exports to the United States	Ratio of exports to the United States to--	
					Production	Total exports
	1,000 short tons				Percent	
1974	3,956	406	498	72	1.8	14.5
1975	4,325	335	476	27	.6	5.7
1976	4,409	408	489	48	1.1	9.8
1977	4,541	418	421	104	2.3	24.7
1978	4,699	402	438	117	2.5	26.7

1/ Defined as 3 millimeters in thickness and thicker.

Source: Compiled from data obtained from Stalexport and presented at the Commission's public hearing.

Note.--Data shown in the table above do not correspond with the U.S. imports from Poland shown elsewhere in this report. This is due partly to the definition of plate for purposes of classifying exports from Poland and partly to the lag time between the departure of the merchandise from Poland and its arrival in the United States.

Data were also presented to the Commission on behalf of Stalexport with respect to the composition of the exports of carbon steel from Poland to the United States. As shown in the following table, universal mill plate ranged from a low of 10 percent of total carbon steel plate exports from Poland to the United States in 1974 to a high of 21 percent in 1976. For the entire 1974-78 period, universal mill plate averaged about 12 percent of total exports.

Carbon steel plate: 1/ Exports to the United States, from Poland, by types, 1974-78

Year	Standard plate	Universal mill plate	Total	Ratio of universal mill plate exports to total exports
	Short tons			Percent
1974	64,751	7,466	72,217	10.3
1975	23,340	3,757	27,097	13.9
1976	38,326	9,991	48,318	20.7
1977	89,472	14,328	103,800	13.8
1978	102,515	14,442	116,957	12.3

1/ Defined as 3 millimeters in thickness and thicker.

Source: Compiled from data obtained from Stalexport and presented at the Commission's public hearing.

Consideration of Injury or the Likelihood Thereof

U.S. consumption

In anticipation of the removal of price controls by the U.S. Government, steel service centers and industrial purchasing agents ordered large quantities of steel mill products in early 1974 for future delivery. This increased demand and the rising cost of production resulted in rising steel prices worldwide. The steel industry began to feel the economic recession in the second quarter of 1975, however, and demand trended downward for the remainder of that year. Demand for steel again increased during the first half of 1976 but trended downward from the third quarter of 1976 through the first quarter of 1977. It trended upward thereafter, continuing upward through 1978.

As shown in the table below, the apparent U.S. consumption of carbon steel plate declined from 10.0 million short tons in 1974 to 6.8 million short tons in 1976 (or by 32 percent) but increased thereafter and in 1978 amounted to 8.5 million short tons--13 percent below the peak 1974 period and 25 percent above the low 1976 level. Table 4 shows U.S. producers' shipments, imports for consumption, exports of domestic merchandise, and apparent consumption of carbon steel plate in 1974-78.

Carbon steel plate: Apparent U.S. consumption, 1974-78

Year	Apparent consumption
	(1,000 short tons)
1974	9,979
1975	7,732
1976	6,787
1977	1/ 7,354
1978	1/ 8,467

1/ Excludes imports of slab from Poland.

Source: Compiled from data supplied by the American Iron and Steel Institute and from official statistics of the U.S. Department of Commerce.

U.S. producers' shipments

Shipments of carbon steel plate by U.S. producers trended downward between 1974 and 1978. As shown in the following table, shipments declined from 9.0 million short tons in 1974 to 5.6 million short tons in 1976 (or by 38 percent) but increased annually thereafter to 6.6 million short tons in 1978--27 percent below the 1974 peak level. The table also shows that intracompany shipments by U.S. producers of carbon steel plate for use in the manufacture of other products fluctuated between a high of 1.2 million short tons in 1974 (13.4 percent of total shipments) and a low of 434,000 short tons in 1976 (7.7 percent of total shipments).

Carbon steel plate: U.S. producers' shipments, 1974-78

(In thousands of short tons)

Year	Shipments (except intracompany transfers)	Intracompany transfers	Total, all shipments
1974	7,828	1,214	9,042
1975	6,077	832	6,909
1976	5,172	434	5,606
1977	5,401	458	5,859
1978	5,992	596	6,588

Source: Compiled from data submitted in response to questionnaires of the U.S. International Trade Commission, and from statistics of the AISI.

Shipments of universal mill plate by U.S. producers

The 12 domestic manufacturers were asked to supply data with respect to their shipments of universal mill plate during 1977 and 1978. Three firms reported that they had shipped it, and three firms reported that they did not sell it. No data were received with respect to universal mill plate shipments by the remaining six producers. 1/ The following table shows shipments of universal mill plate during 1977 and 1978 as reported to the Commission.

Universal mill plate: U.S. producers shipments, 1977-78

Year	Universal mill plate--					
	Not over 12 inches in width			Over 12 inches in width		
	Quantity	Value	Unit value	Quantity	Value	Unit value
	Short tons	1,000 dollars		Short tons	1,000 dollars	
1977	* * *	* * *	$344.21	* * *	* * *	$358.07
1978	* * *	* * *	395.77	* * *	* * *	401.19

Source: Compiled from data supplied in response to questionnaires of the U.S. International Trade Commission.

U.S. exports

U.S. exports of carbon steel plate declined without interruption from 372,000 short tons in 1974 to 45,000 short tons in 1977. They increased in

1/ * * *.

1978 to 99,000 short tons (table 4). Exports accounted for about 4 percent of producers shipments in 1974, 3 percent in 1975, and approximately 1 percent in 1976 and 1977, and 1.5 percent in 1978. Principal markets for U.S. exports of carbon steel plate in recent years included Canada and the Netherlands.

Utilization of productive capacity

Data relating to the utilization of domestic facilities in the production of carbon steel plate are understated because production lost during labor strikes in 1974-78 reduced capacity utilization, because some firm's rolling capacity is limited by their melting capacity, and because some U.S. producers manufacture carbon steel sheet on the same equipment used to produce carbon steel plate,thereby further reducing the capacity of these facilities to produce plate. The following table, which has not been adjusted to compensate for those factors, shows U.S. producers' shipments, U.S. productive capacity, and U.S. capacity utilization in 1974-78.

Carbon steel plate: U.S. producers' shipments and capacity, 1974-78

Year	Shipments	Capacity	Ratio of shipments to capacity
	1,000 short tons	1,000 short tons	Percent
1974	9,042	11,715	77
1975	6,909	11,799	59
1976	5,606	11,778	48
1977	5,859	11,346	52
1978	6,588	11,852	56

Source: U.S. producers' shipments compiled from statistics of the American Iron and Steel Institute; capacity compiled from data submitted in response to questionnaires of the U.S. International Trade Commission.

At the public hearing it was suggested that it would be more accurate for the Commission, following the Wharton School method of estimating capacities, to take the peak output in 1974 as being a reasonable measure of practical U.S. plate capacity. 1/ Using this method, the trend in capacity utilization,

1/ Statement of Professor Joel B. Dirlam, pp. 27-29.

which reflects the same changes in capacity reported in the preceding table, would be as follows:

Carbon steel plate: U.S. producers' shipments and capacity, 1974-78

Year	Shipments	Capacity	Ratio of shipments to capacity
	1,000 short tons	1,000 short tons	Percent
1974	9,042	9,042	100
1975	6,909	9,126	75
1976	5,606	9,105	61
1977	5,859	8,673	67
1978	6,588	9,179	1/ 71

1/ According to the statement of Professor Dirlam, with adjustments for the Alan Wood plant, the Bethlehem Johnston plant, and the plate mill in the Youngstown Campbell plant which were not operating in 1978, and the new sheared plate mill of Bethlehem, which was not fully operational throughout the entire year of 1978, the utilization rate for that year would be 75 percent.

Source: U.S. producers' shipments compiled from statistics of the American Iron and Steel Institute; capacity estimated from data submitted in response to questionnaires of the U.S. International Trade Commission.

Inventories

Inventories of carbon steel plate maintained by U.S. producers and importers are relatively small compared with the volume of inventories held by some of the distributors and end users. In lieu of finished carbon steel plate, U.S. producers tend to inventory slabs or ingots, which can be rolled into many steel-mill products. It is believed that most of the importers do not usually maintain large inventories of plate from Poland. During the period 1974-78, the ratio of producers' yearend inventories to shipments averaged 3 percent, as indicated in the following table.

Carbon steel plate: U.S. producers' shipments and yearend inventories, 1974-78

Year	U.S. producers'--		Ratio of shipments to inventories
	Shipments	Inventories	
	1,000 short tons	1,000 short tons	Percent
1974	9,042	202	2.2
1975	6,909	182	2.6
1976	5,606	194	3.5
1977	5,859	249	4.2
1978	6,588	216	3.3

Source: Compiled from data submitted in response to questionnaires of the U.S. International Trade Commission and from statistics of the AISI.

Employment

Ten producers, which accounted for 82 percent of total shipments of domestic carbon steel plate in 1978, supplied the Commission with usable data on employment and hours worked by production and related workers. According to that data, the number of workers engaged in the production of carbon steel plate declined irregularly from 19,800 in 1974 to 14,600 in both 1977 and 1978. The number of workers engaged in the production of all products at the reporting establishments declined annually from 187,200 in 1974 to 144,000 in 1978. As shown in the following table, hours worked by these employees followed similar trends.

Average number of production and related workers employed at the establishments in which carbon steel plate was produced and hours worked by these employees, 1974-78

Year	Production and related workers engaged in production of--		Hours worked by production and related workers on--	
	All products	Carbon steel plate	All products	Carbon steel plate
	Thousands	Thousands	Millions	Millions
1974	187.2	19.8	373.8	39.4
1975	164.4	18.6	309.3	35.5
1976	163.0	13.8	319.4	27.0
1977	161.0	14.6	316.7	28.4
1978	144.0	14.6	294.1	29.2

Source: Compiled from data submitted in response to questionnaires of the U.S. International Trade Commission.

Financial position of U.S. producers

The Commission received usable profit-and-loss data from 10 firms on the overall operations of establishments in which carbon steel plate was produced (table 5); and 9 of the firms also supplied financial data relating only to their carbon steel plate operations (table 6). The following table shows aggregate selected financial data supplied by the nine firms that responded to the Commission questionnaire on their carbon steel plate operations.

Profit-and-loss experience of U.S. producers on their carbon steel plate operations, 1974-78 1/

Year	Net sales	Net operating profit or (loss) before income tax	Ratio of net operating profit or (loss) to net sales	Number of firms reporting losses
	1,000 dollars	1,000 dollars	Percent	
1974	1,505,879	174,774	11.6	0
1975	1,477,213	(25,800)	(1.7)	4
1976	1,168,007	(31,635)	(2.7)	8
1977	1,335,913	(42,228)	(3.2)	6
1978	1,640,085	39,716	2.4	5

1/ Data are for 9 firms, which accounted for 76 percent of total shipments of U.S. carbon steel plate in 1978.

Source: Compiled from data submitted in response to questionnaires of the U.S. International Trade Commission.

Consideration of the Causal Relationship Between LTFV Imports and the Alleged Injury

Market penetration

The following table presents indexes (in terms of quantity) of apparent U.S. consumption, producers' shipments, total imports, and imports from Poland of carbon steel plate during 1974-78.

Carbon steel plate: Indexes of apparent U.S. consumption, producers' shipments, total imports for consumption, and total from Poland, 1974-78

(1974=100)

Item	1974	1975	1976	1977	1978
Apparent consumption 1/2/	100	77	68	74	85
Producers' shipments	100	76	62	65	73
Total imports 1/2/	100	78	94	118	151
Imports from Poland 1/	100	56	78	101	184

1/ Excludes imports of slab from Poland during 1977 and 1978.

2/ Data for 1974-76 were estimated on the basis of questionnaire returns during recent investigations of the U.S. International Trade Commission.

Source: U.S. consumption and producers' shipments compiled from statistics of the American Iron and Steel Institute; imports compiled from official statistics of the U.S. Department of Commerce, except as noted.

As shown in the following table, the ratio of imported carbon steel plate to apparent U.S. consumption increased from 13.1 percent in 1974 to 23.4 percent in 1978. Imports from Poland increased their market penetration from 0.7 percent of U.S. consumption in 1974 to 1.4 percent in 1978.

Carbon steel plate: Ratios of total imports, total and from Poland, to apparent U.S. consumption and to shipments by U.S. producers, and the share of total imports supplied by Poland, 1974-78

(In percent)

Year	Ratio to apparent consumption of--		Ratio to U.S. producers' shipments of--		Share of total imports supplied by Poland
	Total imports 1/	Imports from Poland	Total imports 1/	Imports from Poland	
1974	13.1	0.7	14.5	0.7	5.0
1975	13.3	.5	14.9	.5	3.6
1976	18.1	.8	22.0	.9	4.2
1977	20.9	.9	26.3	1.1	4.3
1978	23.4	1.4	30.0	1.8	6.1

1/ Data for 1974-76 were estimated on the basis of questionnaire returns during previous investigations by the U.S. International Trade Commission; data for 1977 and 1978 are adjusted to exclude slab.

Source: Apparent consumption and producers' shipments compiled from statistics of the American Iron and Steel Institute; imports were compiled from official statistics of the U.S. Department of Commerce, except as noted.

Regional considerations

Data submitted for the public record during the public hearing by Counsel for the Armco and Bethlehem Steel companies outlined four census regions--the East North and South Central, Middle Atlantic and South Atlantic--that were allegedly affected by the LTFV sales of carbon steel plate. Information obtained by the Commission from importers and import specialists of the U.S. Customs Service at the ports where the bulk of the imports of carbon steel plate from Poland entered the United States indicates that the imported merchandise, for the most part, was consumed within 500 miles of the port of entry. Therefore, it is believed that the bulk of the carbon steel plate imported from Poland during 1976-78 was competitive principally with both the imports from other sources which entered the East North Central and the South Central regions of the United States and with the domestic manufacturers that could economically service those regions. Imports from all sources which entered the United States through ports in the East North Central and South Central Regions averaged 66 percent of total imports of carbon steel plate during 1976-78. Imports into those regions from Poland amounted to 76 percent of the total imports from that source in 1976, 74 percent in 1977, and 74 percent in 1978. For purposes of this report the East North Central region includes Ohio, Indiana, Illinois, Michigan, Wisconsin, and Kentucky; the South Central region includes Texas, Louisiana, Arkansas, Oklahoma, Mississippi, Alabama, and Tennessee. The following table, which excludes slab, shows apparent consumption, producer's shipments, total imports, imports from Poland, and imports from all other sources, during 1976-78, combined for the two regions. Such data are also shown separately for the two regions.

Carbon steel plate (including coils): U.S. consumption, producers' shipments, and imports for consumption, total and from Poland, in the East North Central and South Central regions of the United States, 1976-78

Year	Apparent consumption	Producers' shipments	Total imports	Imports from--	
				Poland	All other sources
	Quantity (1,000 short tons)				
1976	3,922	2,895	1,027	39	988
1977	4,737	3,285	1,452	49	1,403
1978	5,439	3,679	1,760	90	1,670
	Share of consumption				
1976	100.0	73.8	26.2	1.0	25.2
1977	100.0	69.3	30.7	1.0	29.7
1978	100.0	67.6	32.4	1.7	30.7

Source: Shipments were compiled from statistics of the AISI; imports compiled from official statistics of the U.S. Department of Commerce.

East North Central region.--There are approximately 13 domestic steel mills which service the East North Central region. Imports into that region, which include carbon steel plate in coils, accounted for 26 percent of total imports in 1978. Imports from Poland into that region accounted for 21 percent of the total imports from that source in 1978.

It is known that nearly all the hot-rolled slab which was excluded from the Treasury determination entered the United States through the Cleveland customs district. Therefore, the following table for the East North Central region, which includes the Cleveland customs district, has been adjusted to exclude the importation of 33,940 short tons of slab in 1977 and 167,497 short tons in 1978.

Carbon steel plate (including coils): U.S. consumption, producers' shipments, and imports for consumption, total and from Poland, in the East North Central region of the United States 1/ 1976-78

Year	Apparent consumption	Producers' shipments	Total imports 2/3/	Imports from--	
				Poland 3/	All other sources
	Quantity (1,000 short tons)				
1976	2,376	1,972	404	18	386
1977	2,969	2,176	793	19	774
1978	3,052	2,367	685	25	660
	Percent of consumption				
1976	100.0	83.0	17.0	0.7	16.3
1977	100.0	73.3	26.7	.6	26.1
1978	100.0	77.5	22.5	.8	21.7

1/ Includes Ohio, Indiana, Illinois, Michigan, Wisconsin, and Kentucky.
2/ Includes imports entered at the ports of Chicago, Cleveland, Detroit, Milwaukee, Minneapolis, Duluth, and St. Louis.
3/ Excludes 33,940 short tons of slab in 1977 and 167,497 short tons of slab in 1978.

Source: Shipments were compiled from statistics of the AISI; imports compiled from official statistics of the U.S. Department of Commerce, except as noted.

South Central region.--There are approximately five domestic steel mills which service the South Central region of the United States. Imports into that region, which include carbon steel plate in coils, accounted for 40 percent of total imports in 1978. Imports from Poland into this region accounted for 54 percent of total imports from that source in 1978. The following table shows the market conditions in the South Central region of the United States in 1976-78.

Carbon steel plate (including coils): U.S. consumption, producers' shipments, and imports for consumption, total and from Poland, in the South Central region of the United States, 1/ 1976-78

Year	Apparent consumption	Producers' shipments	Total imports 2/	Imports from--	
				Poland	All other sources
	Quantity (1,000 short tons)				
1976	1,546	923	623	21	602
1977	1,768	1,109	659	30	629
1978	2,387	1,312	1,075	65	1,010
	Percent of consumption				
1976	100.0	59.7	40.3	1.4	38.9
1977	100.0	62.7	37.3	1.7	35.6
1978	100.0	55.0	45.0	2.7	42.3

1/ Includes Texas, Louisiana, Arkansas, Oklahoma, Mississippi, Alabama, and Tennessee.

2/ Includes imports entered at the ports of Houston, Galveston, Port Arthur, Laredo, New Orleans, and Mobile.

Source: Shipments were compiled from statistics of the AISI; imports compiled from official statistics of the U.S. Department of Commerce.

Prices

During the Commission investigation on carbon steel plate from Taiwan (USITC Publication 970) price comparisons were made for the 1976-78 period of domestic shipments on the basis of the lowest net selling prices for large-quantity sales (20 tons or more) to nonrelated parties. Price data were obtained from both U.S. producers and importers on lowest net prices of carbon steel plate of ASTM grade A-36 in sizes 1/2 inch and 1-1/4 inch in thickness by 96 inches in width on sales to distributors and end-user accounts. In an effort to update the price information, domestic producers were asked during this investigation to supply comparable price data for the first quarter of 1979. Data comparable to the price data submitted by U.S. producers were obtained from firms which imported carbon steel plate from Poland. Importers that responded to the Commission questionnaire accounted for a declining share of total imports from Poland (62 percent in 1977 and about 35 percent in 1978) and therefore, these data may be of somewhat limited value. It is believed, however, that they accurately reflect the trend in prices.

Prices to distributors.--As stated earlier in this report, the bulk of the imported carbon steel plate reaches an end user only after passing through intermediates--principally distributors (including steel service centers) or warehouses affiliated with the large trading companies. Most of the domestic

steel also passes through intermediates to the ultimate consumer. During the first three quarters of 1977 prices to distributors of domestically produced carbon steel plate measuring 1/2 inch by 96 inches were higher than prices of the product imported from Poland. During the fourth quarter, domestic plate was priced slightly lower than the imported product. On the basis of prices for the full year of 1977, domestic carbon steel plate averaged * * * per short ton more than the merchandise imported from Poland. During 1978, domestic plate was priced higher in each quarter than the plate imported from Poland. The spread between domestic plate and the plate imported from Poland ranged from a high of * * * per short ton in the first quarter of 1978 to a low of * * * per short ton in the third quarter; for the year, domestically produced carbon steel plate was priced an average of * * * per short ton higher than the plate imported from Poland. During the first quarter of 1978, the price of domestic carbon steel plate was * * * above the price of the plate imported from Poland.

No data on prices of carbon steel plate from Poland measuring 1-1/4 inches by 96 inches were supplied by importers for the first three-quarters of 1977 but prices reported for the fourth quarter were slightly below those of domestic plate. Data for 1978 show that the price of the imported product, although increasing each quarter, was substantially below the price of the domestic product during the year. The carbon steel plate imported from Poland undersold the domestic product by * * * per short ton during the first quarter of 1978, * * * during the second quarter, * * * during the third quarter, and * * * during the fourth quarter. Price data were not reported for the first quarter of 1979 by the responding importers. The following table shows the average lowest net selling prices to distributors by U.S. producers of carbon steel plate and U.S. importers of carbon steel plate from Poland.

Carbon steel plate: Average lowest net selling prices to distributors by U.S. producers 1/ and importers of plate from Poland, by sizes, and by quarters, 1977-1978, and January-March 1979

(Per short ton)

Period	Plate measuring 1/2 inch x 96 inches		Plate measuring 1 1/4 inch x 96 inches	
	Domestic	From Poland	Domestic	From Poland
1977:				
January-March	$285	* * *	$279	2/
April-June	300	* * *	289	2/
July-September	310	* * *	307	2/
October-December	304	* * *	299	* * *
1978:				
January-March	326	* * *	335	* * *
April-June	334	* * *	352	* * *
July-September	343	* * *	364	* * *
October-December	352	* * *	364	* * *
1979: January-March	363	* * *	376	2/

1/ Excludes sales to California, Oregon, and Washington.
2/ Data not reported.

Source: Compiled from data submitted in response to questionnaires of the U.S. International Trade Commission.

Prices to end-user accounts.--Prices of carbon steel plate measuring 1/2 inch by 96 inches sold directly to end users by firms which imported the product from Poland were lower than prices received by producers in three of the four quarters of 1977. The price of the imported product averaged about * * * per short ton below that of the domestic product during the first quarter of 1977 and * * * per short ton below the price of the domestic product during the second quarter of 1977. During the third quarter, average prices increased, and the price of the product imported was * * * per short ton, more than that of domestic plate; the price of the imported plate was again slightly below the price of the domestic plate during the last quarter of 1977. The price of the imported plate increased during each quarter of 1978 and was higher than that of the domestic product in each quarter, averaging about * * * per short ton higher than the price of the domestic plate for the year. Although the average price of the imported plate continued upward during the first quarter of 1979, it was slightly less than the price of domestic plate.

Importers of carbon steel plate 1 1/4 inch by 96 inches from Poland did not supply data with respect to prices to end-users for the first two quarters of 1977; data supplied for the third and fourth quarters show that the price of the imported plate was * * * per short ton below the average domestic price

during the third quarter but was * * * during the last quarter. During 1978, prices of imported plate to end-user accounts averaged about * * * per short ton above the price of the domestic plate. The price of the imported plate during the first quarter of 1979, although up about 2 percent from the last quarter of 1978, was * * * per short ton below the price of the domestic product. The following table shows the average lowest net selling prices by U.S. producers and importers of carbon steel plate from Poland to end-user accounts.

Carbon steel plate: Average lowest net selling prices to end-user accounts by U.S. producers 1/ and importers of plate from Poland, by sizes and by quarters, 1977, 1978, and January-March 1979

(Per short ton)

Period	Plate measuring 1/2 inch x 96 inches		Plate measuring 1 1/4 inch x 96 inches	
	Domestic	From Poland	Domestic	From Poland
1977:				
January-March	$285	* * *	$286	2/
April-June	300	* * *	297	2/
July-September	310	* * *	317	* * *
October-December	304	* * *	310	* * *
1978:				
January-March	328	* * *	347	* * *
April-June	343	* * *	350	* * *
July-September	349	* * *	363	* * *
October-December	354	* * *	363	* * *
1979: January-March	367	* * *	378	* * *

1/ Excludes sales to California, Oregon, and Washington.
2/ Data not reported.

Source: Compiled from data submitted in response to questionnaires of the U.S. International Trade Commission.

Lost sales

Information was requested by the Commission from domestic producers with respect to sales they lost to imports from Poland. Nearly all respondents were unable to pinpoint specific customers. Several of the producers, however, were able to identify customers which had reduced their purchases of the domestic product and which were listed as consignees on shipments of carbon steel plate from Poland in import documents. Approximately 10 firms were listed by producers as customers or former customers that had purchased plate

from Poland. The Commission staff attempted to contact these firms, but obtained information from only five of them. Of these one firm used no plate at all (although it used carbon steel in coils, none of which came from Poland), and the remaining four firms reported no decline in purchases of domestic plate. Three firms purchased plate directly from domestic mills, and two of them also purchased limited quantities of imported plate from trading companies. The firms which purchased from trading companies stated that they did not know the country of origin of the imported plate which they purchased. One firm purchased plate from Poland in 1977 and early 1978. These purchases were made not only because of price but also because of the need for a backup source when the main source was in short supply. It has not purchased plate from Poland since early 1978, and representatives of the firm stated that the price of plate from that source is comparable to prices of steel from other foreign sources.

APPENDIX A

TREASURY'S LETTER NOTIFYING THE COMMISSION OF LTFV SALES OF CARBON STEEL PLATE FROM POLAND

THE GENERAL COUNSEL OF THE TREASURY
WASHINGTON, D.C. 20220

APR 1 8 1979

Dear Mr. Chairman:

In accordance with section 201(a) of the Antidumping Act, 1921, as amended, you are hereby advised that carbon steel plate from Poland and produced by Stalexport is being, or is likely to be, sold at less than fair value within the meaning of the Act. The public notice announcing Treasury's determination is enclosed.

The U.S. Customs Service will make available to the Commission as promptly as possible the file relative to this determination. Some of the data contained in the file is regarded by Treasury to be of a confidential nature. It is therefore requested that the Commission consider all the enclosed information to be for official use of the ITC only, not to be disclosed to others without prior clearance from the Treasury Department.

Sincerely yours,

Robert H. Mundheim

The Honorable
Joseph O. Parker
Chairman, U.S. International
Trade Commission
Washington, D.C. 20436

Enclosure

APPENDIX B

NOTICE OF INVESTIGATION AND HEARING

UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, D.C.

[AA1921-203]

CARBON STEEL PLATE FROM POLAND

Notice of Investigation and Hearing

Having received advice from the Department of the Treasury on April 17, 1979, that carbon steel plate from Poland produced by Stalexport is being, or is likely to be, sold at less than fair value, the United States International Trade Commission, on April 27, 1979, instituted investigation No. AA1921-203 under section 201(a) of the Antidumping Act, 1921, as amended (19 U.S.C. 160(a)), to determine whether an industry in the United States is being or is likely to be injured, or is prevented from being established, by reason of the importation of such merchandise into the United States. For the purposes of its determination concerning sales at less than fair value, the Treasury Department defined carbon steel plate as hot-rolled carbon steel plate, not coated or plated with metal and not clad, other than black plate, not alloyed, and other than in coils, as provided for in item 608.8415 of the Tariff Schedules of the United States Annotated.

Hearing. A public hearing in connection with the investigation will be held on Thursday, May 24, 1979, in the Commission's Hearing Room, U.S. International Trade Commission Building, 701 E Street, NW., Washington, D.C. 20436, beginning at 10 a.m., e.d.t. Requests to appear at the public hearing should be filed with the Secretary of the Commission, in writing, not later than noon, Monday, May 14, 1979.

A prehearing conference in connection with this investigation will be held in Washington, D.C., at 10 a.m., e.d.t., on Monday, May 14, 1979, in Room 117, U.S. International Trade Commission Building, 701 E Street, NW.

By order of the Commission.

Kenneth R. Mason
Secretary

Issued: April 30, 1979

APPENDIX C

ADDITIONAL TRIGGER-PRICE INFORMATION

Trigger Pricing

The Department of the Treasury initiated its antidumping investigation on these imports of carbon steel plate on the basis of information developed under its Trigger-Price Mechanism (TPM). This is the second case to come to the Commission in consequence of the TPM, which was designed to assist the domestic steel industry by means of a more expeditious procedure for eliminating or averting the dumping of foreign steel mill products in U.S. markets. 1/ The TPM was put in place on January 3, 1978, and provides a system of reference prices below which purchase prices of U.S. imports of many steel mill products may not fall without "triggering" inquiry by Treasury under provisions of the Antidumping Act, 1921--unless the Secretary of the Treasury is satisfied that the prices are not below "fair value" as defined in the act. Thus, questions as to whether or not dumping has taken place or is likely to take place can be addressed immediately and without receipt of formal petition supported by alleged evidence of dumping.

On various dates during 1978, trigger prices were announced for particular steel mill products. These prices consist of base prices, a schedule for "extras," and provision for c.i.f. charges. They are based on "the full cost of production of the world's most efficient group of steel producers, the Japanese steel companies" and are revised quarterly to reflect estimated changes in production costs, including those in consequence of changes in currency exchange rates. 2/ In October 1978 the yen reached a record high against the U.S. dollar, but since then the yen's value in relation to the dollar has declined.

Trigger prices for carbon steel plate first went into effect on April 30, 1978. 3/ These initial prices applied to shipments loaded during May and June of the second quarter of the year. The prices of the base product and of "extras" were adjusted upward by 5.5 percent for third-quarter shipments and

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1/ As a result of the first case, carbon steel plate from Taiwan (USITC Publication 970), the four participating Commissioners were evenly divided in their votes. Sec. 201(a) of the Antidumping Act provides that the Commission shall be deemed to have made an affirmative determination if the Commissioners voting are evenly divided as to whether the determination should be in the affirmative or in the negative.

2/ On Jan. 3, 1978, the Treasury announced the estimated cost of production for this steel plate (base item) as $241 per net ton, f.o.b. Japan, and importation charges (freight, insurance, interest, and handling) as $41.49, $51.61, $36.78, and $33.40 per net ton, respectively, for East coast, Great Lakes, Gulf coast, and Pacific coast ports. All production cost calculations were based on an exchange rate of ¥ 240 = $1.00.

3/ ASTM A36 specification for plate 1/2" x 80" x 240" in dimension.

by 4.86 percent for fourth-quarter shipments. For 1979, these prices were raised by a further 7.0 percent for the first quarter but are not to be changed for the second quarter. The initial base price for steel plate was established at $266 per metric ton, to which would be added extras for width, thickness, grain, and various other characteristics, and c.i.f. charges as specified for shipments to west coast, gulf coast, Atlantic coast, and Great Lakes ports. Importers' markups and U.S. import duties must also be considered if trigger prices are compared with prices of domestic products. The changes in trigger prices for carbon steel plate that have taken place since their effective date, April 30, 1978, are shown in the table on the following page.

Carbon steel plate (ASTM 36, 1/2" x 80" x 240"): Trigger prices applicable to shipments loaded during Apr. 30-Dec. 31 1978 and January-June 1979, by calendar quarters

(Per metric ton) 1/

Period and port	Base price 2/3/	C.i.f. charges 3/		
		Ocean freight	Handling	Interest
1978:				
Apr. 30-June 30 4/	$266			
West coast ports		$25	$3	$6
Gulf coast ports		25	5	8
Atlantic coast ports		31	4	8
Great Lakes ports		40	4	10
July 1-Sept. 30	281			
West coast ports		25	7	6
Gulf coast ports		25	5	8
Atlantic coast ports		31	4	8
Great Lakes ports		31	4	10
Oct. 1-Dec. 31	295	5/	5/	5/
1979:				
Jan. 1-Mar. 31	316	5/	5/	5/
Apr. 1-June 30	316	6/	6/	5/

1/ Short-ton prices can be converted to metric-ton prices by multiplying by the factor 1.10231, and metric-ton prices to short-ton prices, by multiplying by 0.90718.

2/ Additions to the base price were established for the added costs associated with particular specifications, such as for "width, thickness, chemistry and surface preparation."

3/ Quarterly adjustments in the base price were calculated from the following yen-dollar exchange rates:

2d quarter 1978: ¥ 240 = $1
3d quarter 1978: ¥ 226 = $1
4th quarter 1978: ¥ 215 = $1
1st quarter 1979: ¥ 187 = $1
2d quarter 1979: ¥ 197 = $1

Insurance to be 1 percent of base price plus applicable "extras" plus ocean freight.

4/ Trigger prices for carbon steel plate did not become effective until April 30, 1978.

5/ No change.

6/ All ocean freight charges and west coast handling charges were raised by $1.

APPENDIX D

STATISTICAL TABLES

Table 1.--Carbon steel plates, including coils: 1/ U.S. imports for consumption by principal sources, 1973-78

Source	1973	1974	1975	1976	1977	1978
	Quantity (short tons)					
Belgium	74,531	157,798	46,517	61,059	150,020	399,387
West Germany	107,043	171,342	49,598	23,749	254,678	331,425
Poland	43,748	65,500	36,883	51,057	100,344	289,283
Canada	186,456	197,804	152,319	168,974	235,875	276,473
Spain	43,445	33,819	36,742	50,909	170,843	250,025
France	41,817	69,325	35,540	8,608	121,653	245,649
Italy	7,406	8,738	118,811	123,050	159,510	174,889
Japan	509,803	637,054	737,110	811,210	497,920	173,916
Finland	2/	2/	2/	23,286	86,545	130,146
Republic of South Africa	10,027	4,899	1,031	0	42,094	97,226
Taiwan	0	0	0	0	1,150	91,810
Republic of Korea	45,236	222,520	66,561	135,289	82,802	81,753
All other	234,621	113,574	61,921	91,310	180,999	306,405
Total	1,304,133	1,682,373	1,343,033	1,548,501	2,084,433	2,848,387
	Value (1,000 dollars)					
Belgium	11,111	57,342	13,612	13,353	32,881	99,433
West Germany	16,835	57,615	13,607	5,009	55,424	83,067
Poland	5,840	19,382	9,667	8,857	16,640	48,146
Canada	28,937	41,822	36,284	41,261	60,730	77,018
Spain	6,329	6,448	8,158	9,014	30,042	57,046
France	6,331	23,864	10,607	1,881	24,628	58,990
Italy	1,223	2,886	28,742	25,018	32,542	36,306
Japan	81,225	187,247	211,777	173,790	118,201	48,660
Finland	2/	2/	2/	4,350	14,365	27,052
Republic of South Africa	1,240	1,469	375	0	7,671	20,818
Taiwan	0	0	0	0	237	20,725
Republic of Korea	6,022	36,002	13,652	24,301	14,477	20,490
All other	32,049	35,333	15,362	19,457	38,253	75,562
Total	197,140	469,410	361,843	326,291	446,091	673,313
	Unit value (per short ton)					
Belgium	$149	$363	$293	$219	$219	$249
West Germany	157	336	274	211	218	251
Poland	133	296	262	173	166	166
Canada	155	211	238	244	257	279
Spain	146	191	222	177	176	228
France	151	344	298	219	202	240
Italy	165	330	242	203	204	208
Japan	159	294	287	214	237	280
Finland	3/	3/	3/	187	166	208
Republic of South Africa	124	300	364	-	182	214
Taiwan	-	-	-	-	206	226
Republic of Korea	133	162	205	180	175	251
All other	137	311	248	213	211	247
Total	151	279	269	211	214	236

1/ Includes carbon steel plate, as defined for purposes of this report, and carbon steel plate, in coils, as defined in TSUSA item 608.8410. Not adjusted to exclude slab.
2/ Negligible.
3/ Not applicable.

Source: Compiled from official statistics of the U.S. Department of Commerce.

Note.--Carbon steel plate, not in coils (TSUS No. 608.8415), accounted for about 75 percent of the total coil and plate imports in 1977 and 1978.

Table 2.--Carbon steel plate, not in coils (TSUSA item 608.8415): U.S. imports for consumption, 1/ by principal sources, 1977-78, January-March 1978, and January-March 1979

Source	1977	1978	January-March--	
			1978	1979
	Quantity (short tons)			
Belgium	139,596	385,953	138,269	55,185
Canada	200,316	242,813	63,852	64,762
Spain	170,843	243,776	75,247	15,688
Federal Republic of Germany	135,829	182,839	69,251	14,641
Poland	100,344	288,194	41,533	10,491
Japan	386,168	89,911	34,436	4,535
Finland	71,831	91,330	31,154	11,995
Republic of Korea	31,785	72,248	8,138	14,266
Italy	102,059	81,732	25,373	4,889
Republic of South Africa	33,643	70,443	12,611	17,070
France	49,148	59,454	20,829	3,880
All other	152,264	336,346	62,485	58,215
Total	1,573,926	2,145,039	583,178	275,617
	Value (1,000 dollars)			
Belgium	30,827	96,627	30,449	16,219
Canada	53,802	69,097	17,472	20,271
Spain	30,042	55,973	15,638	5,505
Federal Republic of Germany	31,335	49,561	16,472	4,532
Poland	16,640	47,930	7,742	2,745
Japan	93,752	28,080	10,121	1,971
Finland	11,993	19,655	5,218	3,414
Republic of Korea	5,987	18,633	1,628	4,042
Italy	21,847	17,733	5,230	1,430
Republic of Soth Africa	6,216	15,871	2,322	4,840
France	10,622	14,787	4,593	1,149
All other	32,386	81,435	12,499	16,756
Total	345,449	515,382	129,384	82,874
	Unit value (per short ton)			
Belgium	$221	$250	$220	$294
Canada	269	285	274	313
Spain	176	230	208	351
Federal Republic of Germany	231	271	238	310
Poland	166	166	186	262
Japan	243	312	294	435
Finland	167	215	168	285
Republic of Korea	188	258	200	283
Italy	214	217	206	292
Republic of South Africa	185	225	184	284
France	216	249	211	296
All other	213	242	200	288
Average	219	240	222	301

1/ Not adjusted to exclude slab.

Source: Compiled from official statistics of the U.S. Department of Commerce.

Table 3.--Carbon steel plate not in coils (TSUSA item 608.8415): U.S. imports for consumption from Poland, 1/ by principal customs district, 1977-78

Customs district	1977			1978		
	Quantity	Value	Unit value	Quantity	Value	Unit value
	Short tons	1,000 dollars		Short tons	1,000 dollars	
Cleveland, OH	21,109	2,755	$131	153,938	21,163	$137
Houston, TX	13,301	2,348	177	37,545	7,822	208
New Orleans, LA	15,601	2,675	171	25,960	4,739	183
Detroit, MI	23,399	4,117	176	17,635	4,253	241
Philadelphia, PA	6,900	1,188	172	13,541	2,834	209
Savannah, GA	3,587	654	182	9,463	1,765	186
Chicago, IL	8,045	1,417	176	4,951	1,276	258
Tampa, FL	1,732	321	185	2,044	453	222
Baltimore, MD	1,929	335	174	1,560	301	193
Miami, FL	1,415	259	183	1,008	206	204
All other	3,345	571	171	20,549	3,118	152
Total or average	100,344	16,640	166	288,194	47,930	166

1/ Not adjusted to exclude slab.

Source: Compiled from official statistics of the U.S. Department of Commerce.

Table 4.--Carbon steel plate, not in coils: U.S. producers' shipments, imports for consumption, exports of domestic merchandise, and apparent consumption, 1974-78

(1,000 short tons)

Year	Producers' shipments	Imports 1/	Exports	Apparent consumption	Ratio (percent) of imports to--			
					Producers' shipments		Apparent consumption	
					Total imports	Poland	Total imports	Poland
	Includes slab							
1974	9,042	1,309	372	9,979	14.5	0.7	13.1	0.7
1975	6,909	1,027	204	7,732	14.9	.5	13.3	.5
1976	5,606	1,231	50	6,787	22.0	.9	18.1	.8
1977	5,859	1,574	45	7,388	26.9	1.7	21.3	1.4
1978	6,588	2,145	99	8,634	32.6	4.4	24.8	3.3
	Excludes slab 2/							
1977	5,859	1,540	45	7,354	26.3	1.1	20.9	0.9
1978	6,588	1,978	99	8,467	30.3	1.8	23.3	1.4

1/ Data for 1974-76 estimated on the basis of questionnaire returns during previous Commission investigations on carbon steel plate.

2/ Imports of carbon steel plate greater than 6 inches in thickness (slab) amounted to 33,940 short tons in 1977 and 167,492 short tons in 1978.

Source: Compiled from statistics of the American Iron and Steel Institute and from official statistics of the U.S. Department of Commerce, except as noted.

Table 5.--Profit-and-loss experience of 10 U.S. producers of carbon steel plate on the overall operations of the establishment(s) in which carbon steel plate was produced, by companies, 1974-78

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Table 6.--Profit-amd-loss experience of nine U.S. producers of carbon steel plate on their carbon and steel plate operations, by companies, 1974-78

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