

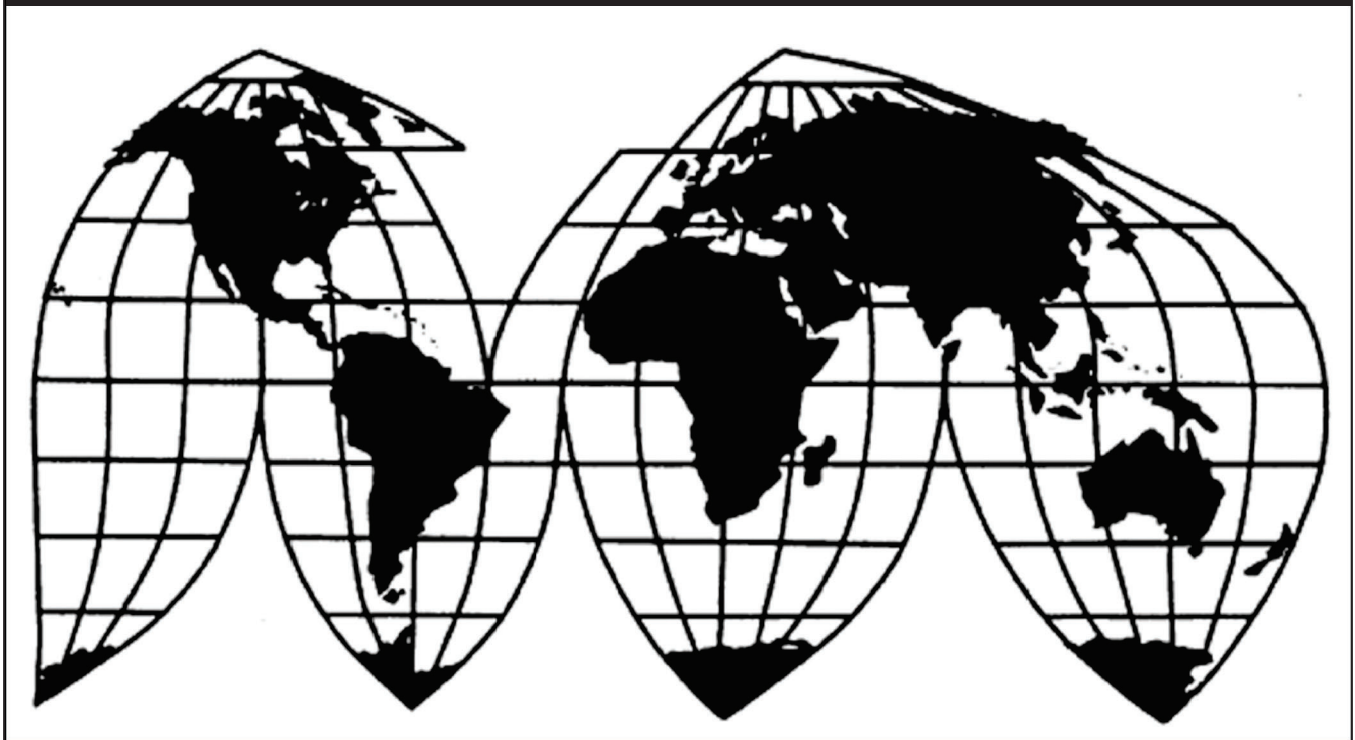
Large Diameter Welded Pipe from Canada, Greece, Korea, and Turkey

Investigation Nos. 701-TA-595-596 and
731-TA-1401, 1403, 1405-1406 (Final)

Publication 4883

April 2019

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

COMMISSIONERS

David S. Johanson, Chairman

Irving A. Williamson

Meredith M. Broadbent

Rhonda K. Schmidlein

Jason E. Kearns

Catherine DeFilippo

Director of Operations

Staff assigned

Lawrence Jones, Investigator

Abu B. Kanu, Investigator

Gregory LaRocca, Industry Analyst

Allison Thompson, Industry Analyst

Aimee Larsen, Economist

Joanna Lo, Financial Analyst

Russell Duncan, Senior Statistician

David Goldfine, Attorney

Henry Smith, Attorney

Douglas Corkran, Supervisory Investigator

Address all communications to
Secretary to the Commission
United States International Trade Commission
Washington, DC 20436

U.S. International Trade Commission

Washington, DC 20436
www.usitc.gov

Large Diameter Welded Pipe from Canada, Greece, Korea, and Turkey

Investigation Nos. 701-TA-595-596 and
731-TA-1401, 1403, 1405-1406 (Final)

Publication 4883



April 2019

CONTENTS

	Page
Determinations	1
Views of the Commission	5
Separate views of Commissioner Jason E. Kearns	29

Part I: Introduction	I-1
Background	I-1
Nature and extent of subsidies and sales at LTFV	I-2
Subsidies	I-2
Sales at LTFV	I-4

Appendixes

A. <i>Federal Register</i> notices	A-1
B. List of staff conference witnesses.....	B-1
C. Summary data	C-1
D. Negligibility	D-1

Note.—Information that would reveal confidential operations of individual concerns may not be published. Such information is identified (including by brackets or by parallel lines) in confidential reports and is deleted and replaced with asterisks in public reports.

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-595-596 and 731-TA-1401, 1403, and 1405-1406 (Final)
Large diameter welded pipe from Canada, Greece, Korea, and Turkey

DETERMINATIONS

On the basis of the record¹ developed in the subject investigations, the United States International Trade Commission (“Commission”) determines,^{2 3} pursuant to the Tariff Act of 1930 (“the Act”), that an industry in the United States is materially injured by reason of imports of carbon and alloy (other than stainless) steel large diameter welded line pipe from Canada, Korea, and Turkey provided for in subheadings 7305.11.10, 7305.11.50, 7305.12.10, 7305.12.50, 7305.19.10, and 7305.19.50 of the Harmonized Tariff Schedule of the United States (“HTSUS”) that have been found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”) and subsidized by the government of Korea. The Commission also determines that an industry in the United States is threatened with material injury by reason of LTFV imports of carbon and alloy (other than stainless) steel large diameter welded line pipe from Greece. Further, the Commission terminates the countervailing duty investigation on carbon and alloy (other than stainless) steel large diameter welded line pipe from Turkey.

The Commission also determines that an industry in the United States is materially injured by reason of imports of carbon and alloy (other than stainless) steel large diameter welded structural pipe from Canada, Korea, and Turkey provided for in subheadings 7305.31.40, 7305.31.60, 7305.39.10, and 7305.39.50 of the HTSUS that have been found by Commerce to be sold in the United States at LTFV and subsidized by the governments of Korea and Turkey. In addition, the Commission terminates the antidumping duty investigation on carbon and alloy (other than stainless) steel large diameter welded structural pipe from Greece.

Finally, the Commission determines that an industry in the United States is not materially injured or threatened with material injury by reason of imports of stainless steel

¹ The record is defined in sec. 207.2(f) of the Commission’s Rules of Practice and Procedure (19 CFR 207.2(f)).

² Commissioner Meredith M. Broadbent did not participate in the determinations regarding imports of large diameter welded pipe from Canada, Greece, Korea, and Turkey.

³ Commissioner Jason E. Kearns determines that an industry in the United States is materially injured by reason of LTFV imports of carbon and alloy (other than stainless) steel large diameter welded pipe from Canada, Korea, and Turkey, as well as imports of such merchandise subsidized by the government of Korea, and is threatened with material injury by reason of LTFV imports of carbon and alloy (other than stainless) steel large diameter welded pipe from Greece; and terminates the countervailing duty investigation on carbon and alloy (other than stainless) steel large diameter welded pipe from Turkey.

large diameter welded pipe from Canada and Korea provided for in subheading 7305.31.60 of the HTSUS, that have been found by Commerce to be sold in the United States at LTFV, and to be subsidized by the government of Korea. Further, the Commission terminates the antidumping duty investigation on stainless steel large diameter welded pipe from Greece and the antidumping and countervailing duty investigations on stainless steel large diameter welded pipe from Turkey.

BACKGROUND

The Commission, pursuant to sections 705(b) and 735(b) of the Act (19 U.S.C. 1671d(b) and 19 U.S.C. 1673d(b)), instituted these investigations effective January 17, 2018, following receipt of a petition filed with the Commission and Commerce by American Cast Iron Pipe Company (Birmingham, Alabama), Berg Steel Pipe Corp. (Panama City, Florida), Berg Spiral Pipe Corp. (Mobile, Alabama), Dura-Bond Industries, Inc. (Export, Pennsylvania), Skyline Steel (Newington, Virginia), and Stupp Corporation (Baton Rouge, Louisiana). Effective August 27, 2018, the Commission established a general schedule for the conduct of the final phase of its investigations on large diameter welded pipe, following notification of preliminary determinations by Commerce that imports of large diameter welded pipe from China, India, Korea, and Turkey were subsidized within the meaning of section 703(b) of the Act (19 U.S.C. 1671b(b)) and that imports of large diameter welded pipe from Canada, China, Greece, India, Korea, and Turkey were being sold at LTFV within the meaning of 733(b) of the Act (19 U.S.C. 1673b(b)). Notice of the scheduling of the final phase of the Commission's investigations and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* on September 6, 2018 (83 FR 45279). The hearing was held in Washington, DC, on November 6, 2018, and all persons who requested the opportunity were permitted to appear in person or by counsel. On January 30, 2019, the Commission issued final affirmative determinations in its antidumping and countervailing duty investigations of carbon and alloy (other than stainless) steel welded large diameter line pipe from India, its antidumping investigation of carbon and alloy (other than stainless) steel welded large diameter line pipe from China, and its antidumping and countervailing duty investigations of carbon and alloy (other than stainless) steel welded large diameter structural pipe from China; final negative determinations in its antidumping and countervailing duty investigations of stainless steel welded large diameter pipe from China and India; and terminated its countervailing duty investigation of carbon and alloy (other than stainless) steel welded large diameter line pipe from China, and its antidumping and countervailing duty investigations of carbon and alloy (other than stainless) steel welded large diameter structural pipe from India (84 FR 1785, February 5, 2019).⁴ Following notification of final determinations by Commerce

⁴ Due to the lapse in appropriations and ensuing cessation of government operations, all import injury investigations conducted under authority of Title VII of the Tariff Act of 1930 accordingly have been tolled pursuant to 19 U.S.C. §§ 1671d(b)(2), 1673d(b)(2).

that imports of large diameter welded pipe from Canada, Greece, Korea, and Turkey were being sold at LTFV within the meaning of section 735(a) of the Act (19 U.S.C. 1673d(a)),⁵ and subsidized by the governments of Korea and Turkey within the meaning of section 705(a) of the Act (19 U.S.C. 1671d(a)),⁶ notice of the supplemental scheduling of the final phase of the Commission's antidumping and countervailing duty investigations with respect to Canada, Greece, Korea, and Turkey was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the Federal Register of March 12, 2019 (84 FR 8892).

⁵ *Large Diameter Welded Pipe From Canada: Final Affirmative Determination of Sales at Less Than Fair Value*, 84 FR 6378, February 27, 2019; *Large Diameter Welded Pipe From Greece: Final Determination of Sales at Less Than Fair Value*, 84 FR 6364, February 27, 2019; *Large Diameter Welded Pipe From the Republic of Korea: Final Determination of Sales at Less Than Fair Value*, 84 FR 6374, February 27, 2019; *Large Diameter Welded Pipe From the Republic of Turkey: Final Determination of Sales at Less Than Fair Value*, 84 FR 6362, February 27, 2019.

⁶ *Countervailing Duty Investigation of Large Diameter Welded Pipe From the Republic of Korea: Final Affirmative Countervailing Duty Determination*, 84 FR 6369, February 27, 2019; and *Large Diameter Welded Pipe From the Republic of Turkey: Final Affirmative Countervailing Duty Determination*, 84 FR 6367, February 27, 2019.

Views of the Commission

Based on the record in the final phase of these investigations, we determine that an industry in the United States is materially injured by reason of imports of large diameter welded carbon and alloy steel line pipe (“LDW line pipe”) from Canada, Korea, and Turkey found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value and subsidized by the government of Korea.¹ We determine that an industry in the United States is threatened with material injury by reason of imports of LDW line pipe from Greece that are sold in the United States at less than fair value. We find that imports of LDW line pipe from Turkey that are subsidized by the government of Turkey are negligible and terminate that investigation with respect to LDW line pipe.²

We further determine that an industry in the United States is materially injured by reason of imports of large diameter welded carbon and alloy steel structural pipe (“LDW structural pipe”) from Canada, Korea, and Turkey found by Commerce to be sold in the United States at less than fair value and subsidized by the governments of Korea and Turkey. We find that imports of LDW structural pipe from Greece that are sold in the United States at less than fair value are negligible and terminate that investigation with respect to LDW structural pipe.

We also determine that an industry in the United States is not materially injured or threatened with material injury by reason of imports of large diameter welded stainless steel pipe (“stainless steel LDW pipe”) from Canada and Korea sold in the United States at less than fair value and subsidized by the government of Korea. We find that imports of stainless steel LDW pipe from Greece and Turkey that are sold in the United States at less than fair value and are subsidized by the government of Turkey are negligible and terminate those investigations with respect to stainless steel LDW pipe.

¹ Commissioner Meredith M. Broadbent did not participate in the determinations regarding subject imports from Canada, Greece, Korea, and Turkey.

² Commissioner Jason E. Kearns finds that LDW line pipe and LDW structural pipe are a single domestic like product (“LDW carbon and alloy steel pipe” or “nonstainless LDWP”) and determines that the domestic industry producing these products is materially injured by reason of subject imports from Canada, Korea, and Turkey sold in the United States at less than fair value and subsidized by the government of Korea. Commissioner Kearns finds that an industry in the United States is threatened with material injury by reason of imports of LDW carbon and alloy steel pipe from Greece that are sold in the United States at less than fair value. Commissioner Kearns finds that imports of LDW carbon and alloy steel pipe from Turkey that are subsidized by the government of Turkey are negligible and terminates that investigation with respect to LDW carbon and alloy steel pipe. *See Separate Views of Commissioner Jason E. Kearns.*

I. Background

The petitions in these investigations were filed on January 17, 2018 by nine domestic producers of large diameter welded pipe (“LDWP”)³ regarding imports of less-than-fair-value (“LTFV”) from Canada, China, Greece, India, Korea, and Turkey and imports of LDWP subsidized by the governments of China, India, Korea, and Turkey. Although the petitions for the antidumping duty and countervailing duty investigations for the six countries were filed on the same day, the investigations became staggered when Commerce issued only its aligned final countervailing duty and antidumping duty determinations regarding subject imports of LDWP from China and India, thereby necessitating earlier final Commission determinations in the investigations regarding China and India. In those earlier investigations, we made affirmative determinations with respect to LDW line pipe from China and India found by Commerce to be sold in the United States at LTFV and subsidized by the government of India. We terminated the investigation of LDW line pipe from China found to be subsidized by the government of China. We made affirmative determinations with respect to LDW structural pipe from China found by Commerce to be sold in the United States at LTFV and subsidized by the government of China. We terminated the investigations of LDW structural pipe from India found to be sold in the United States at LTFV and subsidized by the government of India. We made negative determinations with respect to stainless steel LDW pipe from China and India found by Commerce to be sold in the United States at LTFV and subsidized by the governments of China and India.⁴ For ease of reference, hereafter, we refer to these prior investigations regarding China and India as “the first LDWP investigations.” Commerce’s final affirmative determinations with respect to subsidized and LTFV imports from Korea and Turkey and LTFV imports from Canada and Greece were published on February 27, 2019.

Pursuant to the statutory provision on staggered investigations (19 U.S.C. § 1677 (7)(G)(iii)), the record for the current set of investigations closed on November 29, 2018, at the same time as those for the investigations on subject imports from China and India, except that the final Commerce determinations on subject imports from the remaining four subject countries and the parties’ supplemental comments concerning those determinations have been added to the record.⁵ Therefore, the Commission must make its material injury determination in the instant investigations regarding subject imports from Canada, Greece, Korea, and Turkey

³ American Cast Iron Pipe Company; Berg Steel Pipe Corp./Berg Spiral Pipe Corp.; Dura-Bond Industries; Skyline Steel; Stupp Corporation; Greens Bayou Pipe Mill, LP; JSW Steel (USA) Inc.; Trinity Products LLC; and Welspun Tubular LLC (collectively, “domestic producers” or “petitioners”).

⁴ *Large Diameter Welded Pipe from China and India*, Inv. Nos. 701-TA-593-594 & 731-TA-1402 and 1404 (Final), USITC Pub. 4859 (Jan. 2019) (“*Final Determinations on LDWP from China and India*”).

⁵ 19 U.S.C. § 1677(7)(G)(iii). Supplemental comments concerning Commerce’s subsequent final antidumping and countervailing duty determinations were filed by Petitioners and two sets of respondents: Evraz Inc. NA (“Evraz”), a producer and exporter of the subject merchandise in Canada, and Borusan Mannesmann Boru Sanayi ve Ticaret A.S. and Borusan Istikbal Ticaret T.A.S., producers and exporters of the subject merchandise in Turkey, and Borusan Mannesmann Pipe U.S., Inc. an importer of the subject merchandise (collectively, “Borusan”).

on the basis of the same record as the investigations for subject imports from China and India, except to the extent discussed above.⁶ In the current investigations, we adopt the findings and analyses from our final determinations and views concerning subject imports from China and India with respect to the issues of domestic like product, domestic industry, cumulation, conditions of competition, and material injury and threat of material injury by reason of cumulated subject imports, as supplemented and further explained below to take into account Commerce's final determinations regarding subject imports from Canada, Greece, Korea, and Turkey. In the final determinations regarding China and India, the Commission defined three domestic like products - LDW line pipe, LDW structural pipe, and stainless steel LDW pipe – and accordingly three domestic industries; we have adopted these definitions for our analysis in these subsequent investigations.⁷

II. Negligible Imports

Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product shall be deemed negligible if they account for less than three percent (or four percent in the case of a developing country in a countervailing duty investigation) of all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition.⁸

The statute further provides that subject imports from a single country that comprise less than 3 percent of such total imports of the product may not be considered negligible if there are several countries subject to investigation with negligible imports and the sum of such imports from all those countries collectively accounts for more than 7 percent of the volume of all such merchandise imported into the United States.⁹

Additionally, even if subject imports are found to be negligible for purposes of present material injury, they shall not be treated as negligible for purposes of a threat analysis should the Commission determine that there is a potential that subject imports from the country concerned will imminently account for more than 3 percent (4 percent for countervailing duty investigations of developing countries) of all such merchandise imported into the United

⁶ 19 U.S.C. § 1677(7)(G)(iii).

⁷ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 10-19. Commissioner Kearns defined two domestic like products: LDW carbon and alloy steel pipe and stainless steel LDWP. Commissioner Kearns did not exclude Evraz Oregon as a related party and defined the domestic industry to include all domestic producers including Evraz Oregon. See *Separate Views of Commissioner Jason E. Kearns*.

⁸ 19 U.S.C. §§ 1671d(b), 1673d(b), 1677(24)(A)(i), 1677(24)(B); see also 15 C.F.R. § 2013.1 (developing countries for purposes of 19 U.S.C. § 1677(36)).

⁹ 19 U.S.C. § 1677(24)(A)(ii). In the case of countervailing duty investigations involving developing countries (as designated by the United States Trade Representative (USTR)), the statute indicates that the negligibility limits are 4 percent and 9 percent, rather than 3 percent and 7 percent. 19 U.S.C. § 1677(24)(B). Neither Korea nor Turkey has been designated by USTR as a developing country. 15 C.F.R. §2013.1.

States.¹⁰ The Commission also assesses whether there is a potential that the aggregate volumes of subject imports from all countries with currently negligible imports will imminently exceed 7 percent (9 percent for countervailing duty investigations of developing countries) of all such merchandise imported into the United States.¹¹

A. Final Determinations on Subject Imports from China and India

In the final determinations on subject imports from China and India, the Commission found that subject imports of LDW line pipe from China were negligible for both the antidumping and countervailing duty investigations for purposes of present material injury but not negligible for purposes of threat of material injury in the antidumping duty investigation when collectively considered with subject LDW line pipe imports from Greece.¹² It also found that subject LDW line pipe imports from China were negligible for the countervailing duty investigation and terminated the countervailing duty investigation on LDW line pipe from China.¹³ It found that subject imports of LDW structural pipe from India were negligible for both the antidumping and countervailing duty investigations and terminated both investigations on India with respect to LDW structural pipe.¹⁴ Finally, it found that subject imports from China and India of stainless steel LDW pipe were not negligible for both the antidumping and countervailing duty investigations for purposes of present material injury.¹⁵

B. Arguments of the Parties

Petitioners. Petitioners urge the Commission to find that subject imports from Korea are non-negligible for purposes of present material injury in the countervailing duty investigations of LDWP from Korea.¹⁶ While acknowledging that Commerce calculated *de minimis* subsidy rates for two Korean producers (Husteel and Hyundai Steel), Petitioners claim that Korean subject imports are non-negligible since they accounted for more than 3 percent of total U.S. imports of LDWP during the relevant 12-month period (*i.e.*, January through December 2017), and have the potential to imminently exceed 3 percent of total U.S. imports

¹⁰ 19 U.S.C. § 1677(24)(A)(iv).

¹¹ 19 U.S.C. § 1677(24)(A)(iv).

¹² *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 21-23.

¹³ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 22-23. The Commission found that subject imports of LDW line pipe from India were above the negligibility thresholds for present material injury in both the antidumping and countervailing duty investigations. *Id.* at 22 n.139.

¹⁴ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 21, 23-24. The Commission found that subject imports of LDW structural pipe from China were above the negligibility thresholds for present material injury in both the antidumping and countervailing duty investigations. *Id.* at 23-24 n. 149.

¹⁵ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 24-25.

¹⁶ Petitioners' Comments at 2-3.

of LDWP.¹⁷ Petitioners also argue that the Commission should find that subject imports from Turkey are non-negligible for purposes of present material injury in the countervailing duty investigation of LDWP from Turkey.¹⁸ While recognizing that Commerce calculated a *de minimis* subsidy rate for Turkish producer Borusan, Petitioners maintain that subject imports of LDWP from Turkey are above the 3 percent negligibility threshold for present injury, and have the potential to imminently exceed 3 percent of total U.S. imports.¹⁹

Respondents. In their comments, neither Evraz nor Borusan address the issue of negligibility. Rather, Evraz maintains that the fact that Commerce calculated a relatively low final dumping margin for it in the final phase of the antidumping duty investigations indicates that subject imports from Canada are noninjurious to the domestic LDWP industry.²⁰ Borusan argues that Commerce’s finding a *de minimis* countervailing duty margin and low antidumping duty margin for Borusan in the final antidumping and countervailing duty investigations weighs against reaching an affirmative injury determination, especially given that section 232 duties already are in place as a restraint on LDWP subject imports from Turkey in the U.S. market.²¹

C. Analysis and Conclusions

The statute indicates that the Commission is to make its final negligibility determination in conjunction with its final injury determination.²² Consequently, the only negligibility determinations before the Commission are those concerning subject LTFV imports from Canada and Greece, and subject LTFV and subsidized imports from Korea and Turkey. We examine whether subject imports from Canada, Greece, Korea, and Turkey are negligible for imports corresponding to each of the three domestic like products that the Commission found – (1)

¹⁷ Petitioners’ Comments at 3 n.10.

¹⁸ Petitioners’ Comments at 3-4.

¹⁹ Petitioners’ Comments at 3-4.

²⁰ Evraz Comments at 1-4.

²¹ Borusan Comments at 4-5. Borusan also argues that (1) the Commission cannot properly assess present material injury without collecting additional data beyond June 2018 and therefore should delay the vote in these proceedings until updated information is collected; and (2) the Commission should not cross-cumulate imports from countries that were found to be dumped, but not subsidized (*i.e.*, Canada and Greece) with imports from countries that were found to be subsidized. *See e.g.*, Borusan Comments at 1-4. We note, however, that section 771(7)(G)(iii) of the Tariff Act of 1930, as amended, expressly provides that the “the Commission shall make its determinations based on the record compiled in the first investigation in which it makes a final determination,” with the only exceptions being Commerce’s final determinations and the parties’ final comments concerning the significance of Commerce’s final determinations in the later investigations. 19 U.S.C. § 1677(7)(G)(ii). *See also Large Diameter Welded Pipe From Canada, Greece, Korea, and Turkey: Scheduling of the Final Phase of Antidumping and Countervailing Duty Investigations*: 84 Fed. Reg. 8892-8893 (Mar. 12, 2019). Since a substantial portion of Borusan’s comments fall outside of the permissible scope of the supplemental comments that the Commission specified in its March 12 notice, the Commission has chosen to disregard this material.

²² 19 U.S.C. § 1671d(b)(1), 19 U.S.C. § 1673d(b)(1).

LDW line pipe, (2) LDW structural pipe, and (3) stainless steel LDW pipe – for the 12-month period preceding the filing of the petition (January 2017-December 2017).

As explained below, we find that subject imports of LDW line pipe from Greece are negligible in the antidumping duty investigation for purposes of present material injury but not negligible for purposes of threat of material injury in the antidumping duty investigation. We also find that subject imports of LDW line pipe from Turkey are negligible in the countervailing duty investigation and terminate the countervailing duty investigation on LDW line pipe from Turkey. We find that subject imports of LDW structural pipe from Greece are negligible in the antidumping duty investigation and terminate the antidumping duty investigation on LDW structural pipe from Greece. We further find that subject imports of stainless steel LDW pipe from Greece are negligible in the antidumping duty investigation and terminate the antidumping duty investigation on stainless steel LDW pipe from Greece. Finally, we find that subject imports of stainless steel LDW pipe from Turkey are negligible in the antidumping and countervailing duty investigations and terminate both of those investigations on stainless steel LDW pipe from Turkey.

LDW Line Pipe. The record indicates that subject imports from Greece of LDW line pipe were below the 3 percent negligibility threshold during the applicable 12-month period with respect to the antidumping duty investigation.²³ Subject imports of LDW line pipe from Greece accounted for 1.6 percent of all imports of LDW line pipe in the antidumping duty investigations.²⁴ Further, the aggregate percentage of total imports of LDW line pipe from the two countries (China and Greece) for which imports were below the 3 percent individual subject country statutory negligibility threshold applicable to antidumping duty investigations is 3.3 percent, well below the collective 7 percent negligibility threshold.²⁵ Therefore, we find

²³ There is no countervailing duty investigation on LDW line pipe with respect to Greece.

²⁴ CR/PR at Table D-1 (INV-RR-012) (Mar. 21, 2019). Subject imports of LDW line pipe from Canada, Korea, and Turkey were above the negligibility threshold with respect to the antidumping duty investigations. In the antidumping duty investigations, subject imports of LDW line pipe from Canada accounted for 18.7 percent of all imports of LDW line pipe, subject imports from Korea accounted for 9.6 percent, and subject imports from Turkey accounted for 5.3 percent. *Id.*

²⁵ See CR/PR at Table D-1 (INV-RR-012) (Mar. 21, 2019) (1.7 percent for China and 1.6 percent for Greece). We do not aggregate imports from Greece and China subject to the antidumping duty investigations with those from Turkey subject to the countervailing duty investigation. The Commission has addressed the issue of aggregation of negligible antidumping and countervailing duty investigations in *Certain Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey*, Inv. Nos. 701-TA-559-561 and 731-TA-1317-1328 (Preliminary), USITC Pub. 4615 at 22-23 (May 2016). The Commission noted that it was following its practice from the 1999 *Cold-Rolled Steel* investigations and referred to a statement in the SAA (the substance of which is also clear on the face of the underlying statutory provision), that the special alternative 4 and 9 percent thresholds apply only to subject imports from developing countries in countervailing duty investigations, and it read this limitation as precluding it from cross-aggregating dumped imports with subsidized imports for purposes of assessing developing country negligibility. *Id.* (citing *Certain Cold-Rolled Steel Products from Argentina, Brazil, China, Indonesia, Japan, Russia, Slovakia, South Africa, Taiwan, Thailand, Turkey, and Venezuela*, Inv. Nos. 701-TA-393-396 and 731-TA-829-840 (Preliminary), USITC Pub. 3214 (July 1999) at 16 & n.105). See also *Certain Hot-Rolled Steel Flat* (Continued...)

that subject imports of LDW line pipe from Greece are below the negligibility threshold for present material injury in the antidumping duty investigation. Such imports are ineligible for cumulation for present material injury for purposes of our determination on imports of LDW line pipe from Canada, Korea, and Turkey.

The Commission can consider subject imports of LDW line pipe from Greece for purposes of threat of material injury in the antidumping duty investigation if they have the potential to imminently exceed 3 percent of total imports of LDW line pipe. As explained below, we believe that there is the potential for subject imports of LDW line pipe from Greece to imminently exceed 3 percent.

In its preliminary determinations, the Commission observed that ***, had placed orders for substantial quantities of LDWP from Greece to be delivered during 2018. The Commission found that the orders placed for subject imports from Greece suggested that subject imports from Greece would increase to the levels comparable to those observed during 2015 and 2016 when subject imports from Greece accounted for 15.0 percent and 12.2 percent, respectively, of total imports of LDWP. Accordingly, the Commission concluded that subject imports from Greece had the potential to exceed 3 percent and therefore found that subject imports from Greece were eligible to be cumulated for its analysis of threat of material injury.²⁶

The import data collected for interim 2018 reflect these orders are for LDW line pipe from Greece. Subject imports of LDW line pipe from Greece were much higher in interim 2018 at 101,607 short tons, than in interim 2017 at 2,054 short tons.²⁷ As a result, despite the 12-month negligibility level, subject imports of LDW line pipe from Greece accounted for 25.7 percent of total imports of LDW line pipe during the first six months of 2018.²⁸

The 12-month moving average of subject LTFV imports of LDW line pipe from Greece also exceeded 3 percent during interim 2018 for every month except January when it was 3.0 percent.²⁹ The average increased to 7.2 percent in March 2018 and continued to increase, rising to 14.5 percent of total LDW line pipe imports in the antidumping duty investigations by June 2018.³⁰ Further, *** short tons of LDW line pipe for the second half of 2018.³¹

(...Continued)

Products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey and the United Kingdom, Inv. Nos. 701-TA-545-547 and 731-TA-1291-1297 (Final) USITC Pub. 4638 at 12-14 (Sept. 2016), *aff'd*, *Nucor Corp. v. United States*, Ct. No. 18-13 (Ct. Int'l Trade 2018) (affirming consideration of AD and CVD investigations separately for negligibility).

²⁶ *Large Diameter Welded Pipe from Canada, China, Greece, India, Korea, and Turkey*, Inv. Nos. 701-TA-593-596 & 731-TA-1401-1406 (Preliminary), USITC Pub. 4768 at 16 (“*Preliminary Determinations on LDWP from Canada, China, Greece, India, Korea, and Turkey*”).

²⁷ CR/PR at Table ALT C-2 (INV-RR-012) (Mar. 21, 2019).

²⁸ *Derived from* CR/PR at Table ALT C-2 (INV-RR-012) (Mar. 21, 2019).

²⁹ CR/PR at Table D-2 (INV-QQ-142) (Nov. 29, 2018).

³⁰ CR/PR at Table D-2 (INV-QQ-142) (Nov. 29, 2018).

³¹ CR/PR at Table VII-29 (INV-QQ-137) (Nov. 26, 2018).

Accordingly, we find that subject LTFV imports of LDW line pipe from Greece have the potential to imminently exceed 3 percent of total imports of LDW line pipe.³² We therefore consider subject imports of LDW line pipe from Greece for purposes of our analysis of threat of material injury in the antidumping duty investigation on LDW line pipe imports from Greece.

The record also indicates that subject imports from Turkey of LDW line pipe in the countervailing duty investigation were well below the 3 percent negligibility threshold during the applicable 12-month period. Subject imports of LDW line pipe from Turkey accounted for *** percent of all imports of LDW line pipe in the countervailing duty investigations.³³ Since subject imports of LDW line pipe from Turkey were below the 3 percent threshold during the applicable 12-month period prior to filing of the petition, we find that these imports are negligible for purposes of present material injury in the countervailing duty investigation.^{34 35}

The Commission can consider subject imports of LDW line pipe from Turkey for purposes of threat in the countervailing duty investigation if they have the potential to imminently exceed 3 percent of total imports of LDW line pipe.³⁶ However, subject imports of LDW line pipe from Turkey were dramatically lower in interim 2018, at *** short tons, than in interim 2017 at *** short tons.³⁷ As a result, subject imports of LDW line pipe from Turkey accounted for *** percent of total imports of LDW line pipe during the first six months 2018.³⁸ The 12-month moving average of subject subsidized imports of LDW line pipe from Turkey never exceeded *** percent during interim 2018.³⁹ Furthermore, while *** short tons of LDWP were reported as imported or arranged for importation from Turkey after June 30, 2018, the vast majority of orders, or *** short tons, were reported by ***.⁴⁰ Commerce, however, found

³² We did not aggregate the subject LTFV imports from Greece with the subject LTFV imports from China for purposes of our imminently exceeds analysis in making the finding regarding Greece because subject LTFV imports from Greece imminently exceed the individual 3 percent threshold on their own.

³³ CR/PR at Table D-1 (INV-RR-012) (Mar. 21, 2019). There are no countervailing duty investigations concerning subject imports of LDW line pipe from Greece or Canada. *Id.* Subject imports of LDW line pipe from Korea, at *** percent of all imports of LDW line pipe, were above the negligibility threshold for the countervailing duty investigation. *Id.*

³⁴ CR/PR at Table D-1 (INV-RR-012) (Mar. 21, 2019). Since the countervailing duty investigation with respect to LDW line pipe from China was terminated in the prior determinations, those imports from China cannot be aggregated with subject imports of LDW line pipe from Turkey for negligibility purposes. See 19 U.S.C. §§ 1677(24)(A)(ii), 1677(7)(G)(ii).

³⁵ Although subject imports of LDW line pipe from Turkey in the countervailing duty investigation are ineligible for cumulation for the Commission's present material injury analysis, subject imports of LDW line pipe from Turkey in the antidumping duty investigation are eligible for cumulation for present material injury for purposes of our determination on imports of LDW line pipe from Canada, Korea, and Turkey.

³⁶ 19 U.S.C. § 1677(24)(A)(iv).

³⁷ CR/PR at Table ALT C-2 (INV-RR-012) (Mar. 21, 2019).

³⁸ CR/PR at Table ALT C-2 (INV-RR-012) (Mar. 21, 2019).

³⁹ CR/PR at Table D-2 (INV-RR-022) (Apr. 1, 2019).

⁴⁰ CR/PR at Table VII-29 (INV-QQ-137) (Nov. 26, 2018); Borusan's Importers' Questionnaire Response at II-3a.

a *de minimis* final countervailable duty margin for *** and therefore its imports are no longer subject to the countervailing duty investigation on LDW line pipe from Turkey.⁴¹ Accordingly, there does not appear to be the potential that subject subsidized imports from Turkey will imminently exceed 3 percent. Therefore, we find that subject subsidized imports of LDW line pipe from Turkey are negligible for threat purposes, and terminate the LDW line pipe countervailing duty investigation with respect to Turkey.

LDW Structural Pipe. The record indicates that subject imports from Greece of LDW structural pipe were below the 3 percent negligibility threshold during the pertinent 12-month period.⁴² Subject imports of LDW structural pipe from Greece accounted for 0.0 percent of total imports of LDW structural pipe in the antidumping duty investigations.⁴³ As subject imports of LDW structural pipe from Greece were well below the 3 percent threshold during the applicable 12-month period prior to filing of the petition, we find that these imports are negligible for present material injury in the antidumping duty investigation on imports from Greece.⁴⁴ Such imports are ineligible for cumulation for our analysis of present material injury for purposes of our determination on imports of LDW structural pipe from Canada, Korea, and Turkey.

The Commission can consider subject imports of LDW structural pipe from Greece in the antidumping duty investigation for purposes of threat if they have the potential to imminently exceed 3 percent of total imports of LDW structural pipe. As noted above, subject imports of LDW structural pipe from Greece were very limited.⁴⁵ Corinth, the sole Greek producer of LDWP, ***.⁴⁶ There were no reported subject imports of LDW structural pipe from Greece in interim 2018.⁴⁷ As a result, subject imports of LDW structural pipe from Greece accounted for 0.0 percent of total imports of LDW structural pipe during the first six months 2018.⁴⁸ The 12-month moving average for subject imports of LDW structural pipe from Greece remained at 0.0

⁴¹ *Large Diameter Welded Pipe from the Republic of Turkey: Final Affirmative Countervailing Duty Determination*, 84 Fed. Reg. 6367 (Feb. 27, 2019).

⁴² There is no countervailing duty investigation on LDW structural pipe with respect to Greece.

⁴³ CR/PR at Table D-7 (INV-RR-013) (Mar. 25, 2019). Subject imports of LDW structural pipe from Canada, Korea, and Turkey subject to the antidumping duty investigations were well above the negligibility threshold during the pertinent 12-month period. In the antidumping duty investigations, subject imports of LDW structural pipe from Canada accounted for 13.3 percent of all imports of LDW structural pipe, subject imports of LDW structural pipe from Korea accounted for 21.5 percent, and subject imports of LDW structural pipe from Turkey accounted for 17.1 percent. *Id.*

⁴⁴ CR/PR at Table D-7 (INV-RR-013) (Mar. 25, 2019). Since the antidumping duty investigation with respect to LDW structural pipe from India was terminated in the prior determinations, those imports from India cannot be aggregated with subject imports of LDW structural pipe from Greece for negligibility purposes. See 19 U.S.C. §§ 1677(24)(A)(ii), 1677(7)(G)(ii).

⁴⁵ CR/PR at Table ALT C-5 (INV-RR-012) (Mar. 21, 2019); CR/PR at Fig. D-4 (INV-RR-013) (Mar. 25, 2019).

⁴⁶ CR at VII-20 (INV-QQ-137) (Nov. 26, 2018), PR at VII-12.

⁴⁷ CR/PR at Table ALT C-5 (INV-RR-012) (Mar. 21, 2019).

⁴⁸ CR/PR at Table ALT C-5 (INV-RR-012) (Mar. 21, 2019).

percent throughout interim 2018.⁴⁹ Thus, there does not appear to be the potential that subject imports of LDW structural pipe from Greece will imminently exceed 3 percent. Accordingly, we terminate the antidumping duty investigation with respect to LDW structural pipe from Greece.

Stainless Steel LDW Pipe. The record shows that there were no subject imports of LDW stainless steel pipe from Greece during the applicable 12-month period for the antidumping duty investigation with respect to LDW stainless steel pipe from Greece.⁵⁰ Accordingly, we find that these imports are negligible for the Commission's present material injury analysis in the antidumping duty investigation on imports from Greece.⁵¹ Such imports are ineligible for cumulation for present material injury for purposes of our determination on imports of stainless steel LDW pipe from Canada and Korea.

The Commission can consider subject imports of LDW stainless steel pipe from Greece for purposes of threat in the antidumping duty investigation if they have the potential to imminently exceed 3 percent of total imports of stainless steel LDW pipe. Corinth, the sole Greek producer of LDW pipe, ***.⁵² There were *** of stainless steel LDW pipe from Greece in interim 2018.⁵³ As a result, subject imports of stainless steel LDW pipe from Greece accounted for 0.0 percent of total imports of LDW stainless steel pipe during the first six months 2018.⁵⁴ Moreover, the 12-month moving average for dumped subject imports of stainless steel LDW pipe from Greece was 0.0 percent throughout the POI.⁵⁵ Thus, there does not appear to be the potential that subject imports of LDW stainless steel pipe from Greece will imminently exceed 3 percent.

The record indicates that there were no subject imports of stainless steel LDW pipe from Turkey during the applicable 12-month period for either the antidumping or countervailing duty investigations on stainless steel LDW pipe from Turkey.⁵⁶ Accordingly, we find that these imports are negligible for purposes of the Commission's present material injury analysis in both the antidumping and countervailing duty investigations on Turkey. Such imports are ineligible for cumulation for present material injury for purposes of our determination on imports of stainless steel LDW pipe from Canada and Korea.

⁴⁹ CR/PR at Table D-8 (INV-RR-013) (Mar. 25, 2019).

⁵⁰ CR/PR at Table D-5 (INV-RR-012) (Mar. 21, 2019). In the antidumping duty investigations, subject imports of stainless steel LDW pipe from Canada accounted for 8.6 percent of all imports of stainless steel LDW pipe, and subject imports of stainless steel LDW pipe from Korea accounted for 4.4 percent. *Id.*

⁵¹ There are no countervailing duty investigations on stainless steel LDW pipe with respect to Canada and Greece. Subject imports of stainless steel LDW pipe from Korea, at 4.4 percent of all imports of stainless steel LDW pipe, were above the negligibility threshold for the countervailing duty investigation. *Id.*

⁵² CR at VII-20 (INV-QQ-137) (Nov. 26, 2018), PR at VII-12.

⁵³ CR/PR at Table ALT C-4 (INV-RR-012) (Mar. 21, 2019).

⁵⁴ CR/PR at Table ALT C-4 (INV-RR-012) (Mar. 21, 2019).

⁵⁵ CR/PR at Table D-6 (INV-QQ-142) (Nov. 29, 2018).

⁵⁶ CR/PR at Table D-5 (INV-RR-012) (Mar. 21, 2019).

The Commission can consider subject imports of stainless steel LDW pipe from Turkey for purposes of threat in the each of the antidumping and countervailing duty investigations if they have the potential to imminently exceed 3 percent of total imports of stainless steel LDW pipe. However, the five responding Turkish producers *** during the POI.⁵⁷ There were *** of stainless steel LDW pipe from Turkey in interim 2018.⁵⁸ As a result, subject imports of stainless steel LDW pipe from Turkey in both investigations accounted for 0.0 percent of total imports of stainless steel LDW pipe during the first six months 2018.⁵⁹ The 12-month moving average for subject imports of stainless steel LDW pipe from Turkey did not exceed 0.3 percent since June 2016 in either investigation.⁶⁰ Thus, there does not appear to be the potential that subject imports of stainless steel LDW pipe from Turkey will imminently exceed 3 percent in either the antidumping duty or countervailing duty investigations.

The Commission can also consider subject imports of stainless steel LDW pipe from Greece and Turkey for purposes of present material injury and threat in its antidumping duty investigations if subject imports from both countries collectively exceed 7 percent or have the potential to imminently exceed 7 percent of total imports of stainless steel LDW pipe during the applicable 12-month period.⁶¹ As discussed above, the record indicates that subject imports of stainless steel LDW pipe from neither Greece nor Turkey individually exceeded 3 percent or has the potential to imminently exceed 3 percent in the antidumping duty investigations. Accordingly, there does not appear to be the potential that subject imports of stainless steel LDW pipe from both of these subject countries collectively exceed 7 percent or have the potential to imminently exceed 7 percent in the antidumping duty investigations. We therefore terminate the antidumping duty investigation with respect to stainless steel LDW pipe from Greece, and also terminate the antidumping and countervailing duty investigations with respect to stainless steel LDW pipe from Turkey.

III. Cumulation⁶²

A. Arguments of the Parties

Petitioners' Arguments. Petitioners contend that the Commission already determined that imports of LDW line pipe from Canada, Greece, India, Korea, and Turkey, and imports of

⁵⁷ CR at VII-28 (INV-QQ-137) (Nov. 26, 2018), PR at VII-27.

⁵⁸ CR/PR at Table ALT C-4 (INV-RR-012) (Mar. 21, 2019).

⁵⁹ CR/PR at Table ALT C-4 (INV-RR-012) (Mar. 21, 2019).

⁶⁰ CR/PR at Table D-6 (INV-QQ-142) (Nov. 29, 2018).

⁶¹ 19 U.S.C. § 1677(24)(A)(iv). We do not aggregate imports from Greece and Turkey subject to the antidumping duty investigations with those from Turkey subject to the countervailing duty investigation.

⁶² The Commission incorporates by reference its cumulation analysis set forth in *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 25-32, as supplemented and further explained below to take into account Commerce's final determinations regarding subject imports from Canada, Greece, Korea, and Turkey, and our findings above regarding negligibility.

LDW structural pipe from Canada, China, Korea, and Turkey should be analyzed cumulatively for material injury.⁶³

Respondents' Arguments. Evraz contends that subject imports from Canada should not be cumulated with imports of LDWP from the other subject countries.⁶⁴ According to Evraz, its relatively low dumping margin, the declining volumes of subject imports from Canada from 2015 to 2017, and predominant overselling by subject imports from Canada indicate that subject imports of LDWP from Canada were noninjurious to the domestic industry.⁶⁵

B. Analysis and Conclusions⁶⁶

Since the Commission has defined three separate domestic like products, we consider cumulation separately for LDW line pipe, LDW structural pipe, and stainless steel LDW pipe. Based on our negligibility findings in our final determinations regarding subject imports from China and India, we did not consider subject imports of LDW line pipe from China or subject imports of LDW structural pipe from India to be eligible for cumulation for present material injury.⁶⁷ In accordance with our negligibility findings in the current investigations, we also do not consider subject imports of LDW line pipe from Greece, subject imports of LDW structural pipe from Greece, and subject imports of stainless steel LDW pipe from Greece and Turkey to be eligible for cumulation for the relevant present material injury analyses.

LDW Line Pipe. Given that subject imports of LDW line pipe from Greece (antidumping), China (antidumping and countervailing duty), and Turkey (countervailing duty) are negligible for present injury, only subject imports of LDW line pipe from Canada, India, Korea, and Turkey (antidumping only)⁶⁸ are eligible for cumulation for our present material injury analysis in the current investigations. Therefore, our current cumulation analysis for imports of LDW line pipe differs from the corresponding analysis in the first LDWP investigations since such imports from Greece and Turkey (countervailing duty) are no longer eligible for cumulation. We adopt and incorporate by reference our findings and analysis with respect to cumulation for LDW line pipe in the first LDWP investigations as modified by the exclusion of evidence regarding LDW line pipe from Greece and Turkey (countervailing duty) from that analysis.

We find that there is a reasonable overlap of competition because subject imports from Canada, India, Korea, and Turkey (antidumping) are fungible with the domestic like product and each other, and imports of LDW line pipe from each of the four subject countries and the domestic like product are sold in similar channels of distribution, similar geographic markets,

⁶³ Petitioners' Comments at 2.

⁶⁴ Evraz's Comments at 1, 5.

⁶⁵ Evraz's Comments at 3-4.

⁶⁶ Petitioners filed the antidumping and countervailing duty petitions with respect to all subject countries on the same day, January 17, 2018. CR/PR at I-1.

⁶⁷ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 26.

⁶⁸ The antidumping duty investigation on imports of LDW line pipe from Turkey includes all subject imports from Turkey, including those imports Commerce found to be *de minimis* for Turkish producer Borusan in the countervailing duty investigation on LDW line pipe from Turkey.

and have been simultaneously present in the U.S. market.⁶⁹ We accordingly analyze subject imports of LDW line pipe from Canada, India, Korea, and Turkey (antidumping) on a cumulated basis for our analysis of present material injury by reason of subject imports of LDW line pipe.

LDW Structural Pipe. Given that subject imports of LDW structural pipe from Greece (antidumping) and India (antidumping and countervailing duty) are negligible for present injury, only subject imports of LDW structural pipe from Canada, China, Korea, and Turkey are eligible for cumulation for our present material injury analysis in the current investigations. Our current cumulation analysis for imports of LDW structural pipe differs from the corresponding analysis in the first LDWP investigations since imports from Greece are no longer eligible for cumulation. We adopt and incorporate by reference our findings and analysis with respect to cumulation for LDW structural pipe in the first LDWP investigations as modified by the exclusion of evidence regarding LDW structural pipe from Greece from that analysis.⁷⁰ We note that our cumulation analysis regarding LDW structural pipe in the first LDWP investigations found that there was not a reasonable overlap of competition for such imports from Greece because there were virtually no imports of LDW structural pipe from Greece during the POI. Accordingly, we again find that there is a reasonable overlap in competition between and among the domestic like product and subject imports from Canada, China, Korea, and Turkey. Therefore, we analyze subject imports of LDW structural pipe from these four countries on a cumulated basis for our analysis of present material injury by reason of subject imports of LDW structural pipe.

Stainless Steel LDW Pipe. With subject imports of stainless steel LDW pipe from Greece (antidumping) and Turkey (antidumping and countervailing duty) negligible for present injury, only subject imports of stainless steel LDW pipe from Canada, China, India, and Korea are eligible for cumulation for our present material injury analysis in the current investigations. Therefore, our current cumulation analysis for imports of stainless steel LDW pipe differs from the corresponding analysis in the first LDWP investigations since such imports from Greece and Turkey are no longer eligible for cumulation. We adopt and incorporate by reference our findings and analysis with respect to cumulation for stainless steel LDW pipe in the first LDWP investigations as modified by the exclusion of evidence regarding stainless steel LDW pipe from Greece and Turkey from that analysis.

We find that there is a reasonable overlap of competition since subject imports from Canada, China, India, and Korea are fungible with the domestic like product and each other, and imports of stainless steel LDW pipe from each of the four subject countries and the domestic like product are sold in similar channels of distribution, similar geographic markets, and have been simultaneously present in the U.S. market.⁷¹ We accordingly analyze subject imports of stainless steel LDW pipe from Canada, China, India, and Korea on a cumulated basis for our analysis of present material injury by reason of subject imports of stainless steel LDW pipe.

⁶⁹ See *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 27-29.

⁷⁰ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 29-31.

⁷¹ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 31-32.

IV. Material Injury and Threat of Material Injury by Reason of Cumulated Subject Imports⁷²

A. The LDW Line Pipe Industry is Materially Injured by Reason of Cumulated Subject Imports

Based on the record in the final phase of these investigations, we determine that an industry in the United States is materially injured by reason of imports of LDW line pipe from Canada, Korea, and Turkey found by Commerce to be sold in the United States at less than fair value and subsidized by the government of Korea.

1. Conditions of Competition and the Business Cycle

We adopt and incorporate by reference our findings and analysis with respect to conditions of competition and the business cycle for LDW line pipe in the first LDWP investigations as modified by the exclusion of LDW line pipe from Greece as subject imports.⁷³ In particular, while the market share trends for cumulated subject imports are the same, the actual data changes slightly with the exclusion of imports from Greece from the cumulated subject imports.⁷⁴

2. Volume of Cumulated Subject Imports of LDW Line Pipe

We adopt and incorporate by reference our findings and analysis with respect to the cumulated volume of subject imports of LDW line pipe in the first LDWP investigations as modified by the exclusion of LDW line pipe from Greece as subject imports.⁷⁵ The actual data changes with the exclusion of imports from Greece from the cumulated subject imports, with increases overall in both volume and market share (rather than only market share). Cumulated subject imports of LDW line pipe from Canada, India, Korea, and Turkey declined from *** short

⁷² The Commission incorporates by reference the legal standards set forth in *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 32-36.

⁷³ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 37-40.

⁷⁴ Cumulated subject imports, with LDW line pipe imports from China and Greece excluded, increased their share of apparent U.S. consumption overall. CR/PR at Table ALT C-2 (INV-RR-012) (Mar. 21, 2019). Cumulated subject imports of LDW line pipe (with imports from China and Greece excluded) were *** percent of apparent U.S. consumption in 2015, *** percent in 2016, *** percent in 2017, *** percent in interim 2017, and *** percent in interim 2018. *Id.* Nonsubject imports' share of apparent U.S. consumption (with imports from China and Greece included) were *** percent in 2015, *** percent in 2016, *** percent in 2017, *** percent in interim 2017, and *** percent in interim 2018. *Id.*

⁷⁵ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 41-43. We also incorporate by reference our responses to party arguments, including those regarding two large projects (Mountain Valley and Valley Crossing). *Id.*

tons in 2015 to *** short tons in 2016, and then increased to *** short tons in 2017.⁷⁶ Cumulated subject imports increased in absolute terms over the POI, and had an increasing presence in the U.S. market during the POI as the U.S. market was contracting. From 2015 to 2017, when apparent U.S. consumption fell by 29.4 percent by quantity, the volume of cumulated subject imports increased by *** percent.⁷⁷ As a result, cumulated subject imports increased their share of the U.S. market. Their share initially declined from *** percent of apparent U.S. consumption in 2015 to *** percent in 2016, but then increased to *** percent in 2017.⁷⁸

In view of the foregoing, we find that the volume of cumulated subject imports of LDW line pipe from Canada, India, Korea, and Turkey, and the increase in volume are significant in both absolute terms and relative to apparent U.S. consumption.

3. Price Effects of the Cumulated Subject Imports of LDW Line Pipe

We adopt and incorporate by reference our findings and analysis with respect to the price effects of cumulated subject imports of LDW line pipe in the first LDWP investigations as modified by the exclusion of LDW line pipe from Greece as subject imports.⁷⁹ In particular, while the trends for cumulated subject imports and our response to parties' arguments are the same, the actual pricing data changes slightly with the exclusion of imports from Greece from the cumulated subject imports (Canada, India, Korea, and Turkey), and therefore is discussed below.

Because of the concentration of transactions being awarded through a bid process, the Commission requested U.S. purchasers to provide the bid data for their five largest purchases of LDW line pipe since January 1, 2015 that involved at least one bid from a U.S. producer and least one bid from a supplier of LDW line pipe from subject sources.⁸⁰ In the current investigations, cumulated subject import quotes were lower than domestic producers' bids in 40 of 72 instances.⁸¹ Subject imports won bidding for projects in 14 instances when there was

⁷⁶ CR/PR at Table ALT C-2 (INV-RR-012) (Mar. 21, 2019) (subject imports minus imports from China and Greece). Cumulated subject imports were *** short tons in interim 2017 and *** short tons in interim 2018. *Id.* We do not accord reduced weight to interim 2018 data and adopt and incorporate by reference our findings and analysis with respect to post-petition effects. *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 41 n.287.

⁷⁷ CR/PR at Table ALT C-2 (INV-RR-012) (Mar. 21, 2019).

⁷⁸ CR/PR at Table ALT C-2 (INV-RR-012) (Mar. 21, 2019). Cumulated subject imports of LDW line pipe were *** percent of apparent U.S. consumption in interim 2017 and *** percent in interim 2018. *Id.*

⁷⁹ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 43-46. We also incorporate by reference our responses to party arguments regarding price effects. *Id.*

⁸⁰ CR/PR (INV-QQ-137) (Nov. 26, 2019) at V-7 to V-8; PR at V-5. Eighteen purchasers provided information for 77 LDW line pipe bidding events. CR at V-8, F-2; PR at V-5, F-2.

⁸¹ CR/PR (INV-QQ-142) (Nov. 29, 2019) at Table V-4 (not including China and Greece). Cumulated subject imports underbid domestic producers by an average margin of 17.2 percent and overbid by an average margin of 11.7 percent. *Id.*

more than one source reported.⁸² In 10 of the 14 instances when subject imports won the sale, the subject imports' bid was lower than the domestic producer's bid for a LDW line pipe project.⁸³ In six of the 10 instances in which the subject imports' bid was lower than the domestic producer's bid, the winning bid from the subject imports was also the lowest bid submitted.⁸⁴ In the eight instances in which the subject imports winning bid was not the lowest-priced bid for a LDW line pipe project, the bid was still lower than the domestic producer's bid in four instances.⁸⁵

We have also considered the lost sales data for LDW line pipe. Thirty-two purchasers reported they had purchased LDW line pipe from subject sources instead of the domestic product. Twenty-nine purchasers indicated that the LDW line pipe from subject sources was lower-priced. Further, 20 of the 29 purchasers indicated that the lower price of the subject imports was a primary reason for their decision to purchase subject imports. These 20 purchasers reported purchasing *** short tons of subject imports (not including subject imports from China and Greece) during the POI.⁸⁶ We calculate that a total volume of *** short tons of sales were lost to cumulated subject imports—an amount equivalent to *** percent of total apparent U.S. consumption during the POI.⁸⁷ In sum, a substantial portion of apparent U.S. consumption has been confirmed by purchasers as having been awarded to the cumulated subject imports during the POI for price-related reasons.

In addition to our analysis and findings in the first LDWP investigations, we have considered in the current investigations the significant underselling reflected in the bid data and the lost sales involving a substantial volume of LDW line pipe and find that the underselling

⁸² CR/PR (INV-QQ-142) (Nov. 29, 2019) at Tables D-19 and V-5 (not including China and Greece). Subject sources also won the bidding in 5 instances when the purchaser only identified the winning bidder. *Id.*

⁸³ CR/PR (INV-QQ-142) (Nov. 29, 2019) at D-19 and Table V-5 (not including China and Greece).

⁸⁴ CR/PR (INV-QQ-142) (Nov. 29, 2019) at D-19 and Table V-5 (not including China and Greece).

⁸⁵ CR/PR (INV-QQ-142) (Nov. 29, 2019) at D-19 and Table V-5 (not including China and Greece). Domestic producers won the bidding in 34 instances in which bids were reported for both domestic and subject sources. *Id.* In 19 of the 34 instances when a domestic producer won the bidding against a subject source, the domestic producer's bid was not the lowest priced bid. *Id.* In another four instances the bids from subject sources were not reported by the purchaser. *Id.*

⁸⁶ CR/PR (INV-QQ-137) (Nov. 26, 2019) at Table V-9. In our analysis of cumulated subject imports in the first LDWP investigations, we found that the *** short ton Valley Crossing project was lost to lower-priced subject imports. Confidential Final Determinations on LDWP from China and India, EDIS Doc. 665941 (January 2019) at 41-43. We previously noted that estimates vary for the total volume of subject imports for this project. *Id.* at 69 n.311.

⁸⁷ See CR/PR (INV-QQ-137) (Nov. 26, 2019) at Tables V-9 and CR/PR (INV-RR-012) (Mar. 21, 2019) at Table ALT C-2 (not including China and Greece). Cumulated subject imports totaled *** short tons during the POI. The *** short tons of lost sales (not including imports from China and Greece) represent *** percent of cumulated subject imports. If the *** short tons of subject imports for the Valley Crossing project are added to the lost sales analysis, lost sales represent *** percent of cumulated subject imports of LDW line pipe during the POI. Similarly, the *** short tons of lost sales are equivalent to *** percent of the 7,785,416 short tons of total apparent U.S. consumption of LDW line pipe during the POI. See CR/PR (INV-RR-012) (Mar. 21, 2019) at Table ALT C-2.

led to substantial volumes of cumulated subject imports (Canada, India, Korea, and Turkey) of LDW line pipe purchased instead of the domestic product. For the foregoing reasons, we find that cumulated subject imports of LDW line pipe from Canada, India, Korea, and Turkey have had significant price effects on the domestic industry.

4. Impact of the Cumulated Subject Imports of LDW Line Pipe⁸⁸

We adopt and incorporate by reference our findings and analysis with respect to the impact of cumulated subject imports of LDW line pipe on the domestic industry in the first LDWP investigations as modified by the exclusion of LDW line pipe from Greece as subject imports.⁸⁹ Accordingly, we find that cumulated subject imports from Canada, India, Korea, and Turkey had a significant adverse impact on the domestic industry. In particular, our analysis of the impact on the domestic industry by cumulated subject imports and our responses to party arguments are the same, with the exclusion of imports from Greece from the cumulated subject imports.⁹⁰

For the foregoing reasons, we find that the domestic industry producing LDW line pipe is suffering material injury by reason of cumulated subject imports from Canada, India, Korea, and Turkey. Accordingly, we make an affirmative determination of present material injury in the antidumping duty investigations of LDW line pipe from Canada, Korea, and Turkey and the countervailing duty investigation of LDW line pipe from Korea.

⁸⁸ The statute instructs the Commission to consider the “magnitude of the dumping margin” in an antidumping proceeding as part of its consideration of the impact of imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final determinations, Commerce found antidumping duty margins of 12.32 percent for imports from Canada, 7.03 percent to 20.39 percent for imports from Korea, and 4.55 percent to 5.05 percent for imports from Turkey. *Large Diameter Welded Pipe From Canada: Final Determination of Sales at Less than Fair Value*, 84 Fed. Reg. 6362 (Feb. 27, 2019); *Large Diameter Welded Pipe From Korea: Final Determination of Sales at Less than Fair Value*, 84 Fed. Reg. 6374 (Feb. 27, 2019); *Large Diameter Welded Pipe From Turkey: Final Determination of Sales at Less than Fair Value*, 84 Fed. Reg. 6 (Feb. 27, 2019). We take into account in our analysis the fact that Commerce has made final findings that all subject producers in Canada, Korea, and Turkey are selling subject imports in the United States at less than fair value. In addition to this consideration, our impact analysis has considered other factors affecting domestic prices. Our analysis of the significant underselling and price effects of subject imports, described in both the price effects discussion and below, is particularly probative to an assessment of the impact of the subject imports.

⁸⁹ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 47-50. We also incorporate by reference our responses to party arguments regarding the impact of cumulated subject imports on the domestic industry.

⁹⁰ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 49-50. With respect to other factors, the volume of nonsubject imports (including China and Greece) changed slightly but still declined each full year of the POI in absolute terms and as a percentage of apparent U.S. consumption. CR/PR (INV-RR-012) (March 21, 2019) at Table ALT C-2.

B. Threat of Material Injury by Reason of Cumulated Subject Imports of LDW Line Pipe⁹¹

As explained above, subject imports of LDW line pipe from China (countervailing duty) and Turkey (countervailing duty) are negligible for threat, but subject imports of LDW line pipe from Canada, China (antidumping), Greece, India, Korea, and Turkey (antidumping) are eligible for our analysis of threat of material injury in these staggered investigations. We found in the first LDWP investigations regarding subject imports from China and India that there is a reasonable overlap of competition between subject imports of LDW line pipe from all six subject countries and between subject imports from each subject source and the domestic like product, and there is no information on the record to suggest that this reasonable overlap in competition will not continue into the imminent future.⁹² Since the subject imports from the same six subject countries are eligible for cumulation here, we adopt and incorporate by reference our findings and analysis with respect to cumulation for threat, as modified by the exclusion of imports of LDW line pipe from Turkey (countervailing duty),⁹³ for our analysis of whether there is a threat of material injury to the domestic industry by reason of subject imports from Greece.

Moreover, because we are cumulating the same subject imports of LDW line pipe for our threat analysis, we adopt and incorporate by reference here our findings and analyses with respect to threat of material injury by reason of subject imports of LDW line pipe in the first LDWP investigations.⁹⁴ Accordingly, we make an affirmative determination of a threat of material injury in the antidumping duty investigation of LDW line pipe from Greece.

C. The LDW Carbon and Alloy Steel Structural Pipe Industry is Materially Injured by Reason of Subject Imports⁹⁵

As explained above, subject imports of LDW structural pipe from Greece (antidumping) and India (antidumping and countervailing duty) are negligible for purposes of our analyses of present material injury and threat of material injury. Therefore, only subject imports of LDW structural pipe from Canada, China, Korea, and Turkey are eligible for cumulation for present material injury in these staggered investigations. We note that our cumulation analysis regarding LDW structural pipe for present material injury in the first LDWP investigations found that there was not a reasonable overlap of competition for subject imports from Greece

⁹¹ The Commission incorporates by reference the legal standards for threat of material injury set forth in *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 50-51.

⁹² *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 51-54.

⁹³ The antidumping duty investigation with respect to LDW line pipe for Turkey includes all subject imports from Turkey, including those Commerce found to be *de minimis* for Turkish producer Borusan in the countervailing duty investigation for LDW line pipe from Turkey. Consequently, for purposes of our analysis, the volume of subject imports from Turkey remains the same.

⁹⁴ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 51-58.

⁹⁵ The Commission incorporates by reference the legal standards set forth in *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 32-36.

because there were virtually no imports of LDW structural pipe from Greece during the POI.⁹⁶ Consequently, the data for cumulated subject imports and our responses to party arguments are the same here since the data for imports from Greece (in addition to India) were already excluded from the analysis of cumulated subject imports of LDW structural pipe in the first LDWP investigations.⁹⁷

We adopt and incorporate by reference our findings and analysis with respect to cumulation, conditions of competition and material injury by reason of cumulated subject imports of LDW structural pipe on the domestic industry in the first LDWP investigations as modified by the exclusion of LDW structural pipe from Greece as subject imports.⁹⁸ Accordingly, we make an affirmative determination of present material injury in the antidumping duty investigations of LDW structural pipe from Canada, Korea, and Turkey and the countervailing duty investigations of LDW structural pipe from Korea and Turkey.

D. The Stainless Steel LDW Pipe Industry is Not Materially Injured by Reason of Subject Imports⁹⁹

Based on the record in the final phase of these investigations, we determine that an industry in the United States is not materially injured or threatened with material injury by reason of imports of stainless steel LDW pipe from Canada and Korea found by Commerce to be sold in the United States at less than fair value and subsidized by the government of Korea. Given that subject imports of stainless steel LDW pipe from Greece (antidumping) and Turkey (antidumping and countervailing duty) are negligible for purposes of present material injury and threat of material injury, only subject imports of stainless steel LDW pipe from Canada, China, India, and Korea are eligible for cumulation for our analysis of present and threat of material injury in these staggered investigations. We note that our cumulation analysis regarding stainless steel LDW pipe for present and threat of material injury in the first LDWP investigations found that there was not a reasonable overlap of competition for such imports from Greece because there were virtually no imports of stainless steel LDW pipe from Greece during the POI.¹⁰⁰ However, while imports of stainless steel LDW pipe from Greece were already excluded from the Commission's analysis of cumulated subject imports of stainless steel LDW pipe in the first LDWP investigations, such imports from Turkey were not.

⁹⁶ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 29-31. In the prior investigations, the Commission did not cumulate Greece for present injury with respect to LDW structural pipe. *Id.*

⁹⁷ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 29-31.

⁹⁸ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 58-69.

⁹⁹ The Commission incorporates by reference the legal standards set forth in *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 32-36.

¹⁰⁰ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 31-32. In the prior determinations, the Commission did not cumulate Greece for either present injury or threat with respect to stainless steel LDW pipe. USITC Pub. 4859 at 31-32, 77.

1. Conditions of Competition and the Business Cycle

We adopt and incorporate by reference our findings and analysis with respect to conditions of competition and the business cycle for stainless steel LDW pipe in the first LDWP investigations as modified by the exclusion of stainless steel LDW pipe from Greece and Turkey as subject imports.¹⁰¹ In particular, while the market share trends for cumulated subject imports are the same, the actual data changes slightly with the exclusion of imports from Greece and Turkey from the cumulated subject imports.¹⁰²

2. Volume of Cumulated Subject Imports of Stainless Steel LDW Pipe

We adopt and incorporate by reference our findings and analysis with respect to the cumulated volume of subject imports of stainless steel LDW pipe in the first LDWP investigations as modified by the exclusion of stainless steel LDW pipe from Turkey as subject imports.¹⁰³ While the analysis for cumulated subject imports are similar, the actual data changes slightly with the exclusion of imports from Turkey from the cumulated subject imports. Cumulated subject imports of stainless steel LDW pipe from Canada, China, India, and Korea fluctuated in the U.S. market from 2015 to 2017 but decreased overall; they were 540 short tons in 2015, 3,175 short tons in 2016, and 528 short tons in 2017, an overall decrease of 2.2 percent.¹⁰⁴ Cumulated subject imports' market share similarly fluctuated from 2015 to 2017 and increased slightly overall; subject imports' market share was *** percent of apparent U.S. consumption in 2015, *** percent in 2016, and *** percent in 2017.¹⁰⁵ The record indicates that the increase in cumulated subject import volume and market share in 2016 was almost entirely driven by subject imports from Korea that were imported for a specific project.¹⁰⁶

¹⁰¹ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 69-72.

¹⁰² Cumulated subject imports, with stainless steel LDW pipe imports from Greece and Turkey excluded, increased their share of apparent U.S. consumption overall. CR/PR at Table ALT C-4 (INV-RR-012) (Mar. 21, 2019). Cumulated subject imports of stainless steel LDW pipe (with imports from Greece and Turkey excluded) were *** percent of apparent U.S. consumption in 2015, *** percent in 2016, *** percent in 2017, *** percent in interim 2017, and *** percent in interim 2018. *Id.* Nonsubject imports' share of apparent U.S. consumption (with imports from Greece and Turkey included) were *** percent in 2015, *** percent in 2016, *** percent in 2017, *** percent in interim 2017, and *** percent in interim 2018. *Id.*

¹⁰³ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 72.

¹⁰⁴ CR/PR (INV-RR-012) (Mar. 21, 2019) at Table ALT C-4. Cumulated subject imports were 379 short tons in interim 2017 and 468 short tons in interim 2018. *Id.*

¹⁰⁵ CR/PR (INV-RR-012) (Mar. 21, 2019) at Table ALT C-4. Cumulated subject imports' market share was *** percent in interim 2017 and *** percent in interim 2018. *Id.*

¹⁰⁶ Subject imports from Korea were 2,978 short tons in 2016, or 93.8 percent of cumulated subject imports (less Greece and Turkey) in 2016. CR/PR (INV-RR-012) (Mar. 21, 2019) at Table ALT C-4. The record indicates that subject imports from Korea in 2016 were imported for *** Email from *** (EDIS Doc No. 66428) (Oct. 26, 2018).

In light of the foregoing, we find that the volume of cumulated subject imports of stainless steel LDW pipe from Canada, China, India, and Korea is significant in both absolute terms and relative to consumption.¹⁰⁷

3. Price Effects of the Cumulated Subject Imports of Stainless Steel LDW Pipe

We adopt and incorporate by reference our findings and analysis with respect to the price effects of cumulated subject imports of stainless steel LDW pipe in the first LDWP investigations as modified by the exclusion of stainless steel LDW pipe from Turkey as subject imports.¹⁰⁸ In particular, while the trends for cumulated subject imports are the same, the actual pricing data changes slightly with the exclusion of imports from Turkey from the cumulated subject imports (Canada, China, India, and Korea), and therefore is discussed below.

No purchaser reported bid information for a project that involved stainless steel LDW pipe.¹⁰⁹ AUV data (with the exclusion of imports from Greece and Turkey) show that domestic values for stainless steel LDW pipe were lower than cumulated subject import values each year from 2015 to 2017, as also was evident in the first LDWP investigations.¹¹⁰ We also note that the subject imports from Korea that were imported in 2016 had an AUV of \$5,938, which was substantially higher than the domestic producers' U.S. shipment unit value of *** for that year. We recognize that AUV data may be affected by a mix of stainless steel LDW pipe products, however, the cumulated subject import AUVs were consistently valued higher than the domestic like product AUVs. We therefore cannot conclude that cumulated subject imports of stainless steel LDW pipe from Canada, China, India, and Korea significantly undersold the domestic like product during the POI.

Based on our analysis and findings in the first LDWP investigations, as modified by the exclusion of imports from Turkey, we find that the significant volume of cumulated subject imports did not significantly undersell the domestic like product, nor do we find that cumulated

¹⁰⁷ As discussed below, however, we do not find that subject imports had either significant price effects or impact on the domestic industry.

¹⁰⁸ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 72-74.

¹⁰⁹ CR/PR (INV-QQ-137) (Nov. 26, 2018) at V-8 n.10; PR at V-5 n.10. As noted in the first LDWP investigations, in the final phase, petitioners submitted no comments regarding the collection of bid or other pricing data for stainless steel LDW pipe in their comments on the draft purchasers' questionnaires. See *Petitioners' Comments on Draft Questionnaires* (May 24, 2018).

¹¹⁰ CR/PR (INV-RR-012) (Mar. 21, 2019) at Table ALT C-4. As noted in the first LDWP investigations, U.S. producers' U.S. shipments AUVs were *** in 2015, *** in 2016, *** in 2017, *** in interim 2017, and *** in interim 2018. *Id.* Similarly, U.S. producers' net sales AUVs were *** in 2015, *** in 2016, *** in 2017, *** in interim 2017, and *** in interim 2018. *Id.* In the current investigations, cumulated subject import AUVs (with the exclusion of Greece and Turkey) were \$9,012 in 2015, \$5,903 in 2016, \$5,694 in 2017, *** in interim 2017, and *** in interim 2018. *Id.* We recognize that cumulated subject imports' AUVs were 10.5 percent lower in interim 2018 than in interim 2017, however, cumulated subject imports' market share remained stable between the interim periods, at *** percent in interim 2017 and *** percent in interim 2018. *Id.*

subject imports had significant price-depressing effects on the prices of the domestic like product or prevented price increases, which otherwise would have occurred, to a significant degree. We consequently find that the cumulated subject imports of stainless steel LDW pipe from Canada, China, India, and Korea did not have a significant effect on prices for the domestic like product.

4. Impact of Cumulated Subject Imports of Stainless Steel LDW Pipe¹¹¹

We adopt and incorporate by reference our findings and analysis with respect to the impact of cumulated subject imports of stainless steel LDW pipe on the domestic industry in the first LDWP investigations as modified by the exclusion of stainless steel LDW pipe from Turkey as subject imports.¹¹² Accordingly, we find that cumulated subject imports from Canada, China, India, and Korea did not have a significant adverse impact on the domestic industry. In particular, our analysis of the impact on the domestic industry by cumulated subject imports is the same, with the exclusion of imports from Turkey from the cumulated subject imports.¹¹³

For the foregoing reasons, we find that the domestic stainless steel LDW pipe industry is not suffering material injury by reason of cumulated subject imports from Canada, China, India, and Korea.

E. No Threat of Material Injury by Reason of Cumulated Subject Imports of Stainless Steel LDW Pipe

As explained above, subject imports of stainless steel LDW pipe from Greece (antidumping) and Turkey (antidumping and countervailing duty) are negligible for threat, but subject imports of stainless steel LDW line pipe from Canada, China, India, and Korea, are

¹¹¹ The statute instructs the Commission to consider the “magnitude of the dumping margin” in an antidumping proceeding as part of its consideration of the impact of imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final determinations, Commerce found antidumping duty margins of 12.32 percent for imports from Canada and 7.03 percent to 20.39 percent for imports from Korea. *Large Diameter Welded Pipe From Canada: Final Determination of Sales at Less than Fair Value*, 84 Fed. Reg. 6362 (Feb. 27, 2019); *Large Diameter Welded Pipe From Korea: Final Determination of Sales at Less than Fair Value*, 84 Fed. Reg. 6374 (Feb. 27, 2019). We take into account in our analysis the fact that Commerce has made final findings that all subject producers in Canada and Korea are selling subject imports in the United States at less than fair value. In addition to this consideration, our impact analysis has considered other factors affecting domestic prices. Our analysis of the significant underselling and price effects of subject imports, described in both the price effects discussion and below, is particularly probative to an assessment of the impact of the subject imports.

¹¹² *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 74-77. We note that Petitioners did not discuss stainless steel LDW pipe or the industry producing such products in any of their submissions to the Commission.

¹¹³ We recognize that cumulated subject imports’ market share (with the exclusion of Greece and Turkey) increased from *** percent to *** percent from 2015 to 2017, but also point out that the domestic industry’s market share similarly increased for the same period. CR/PR (INV-RR-012) (March 21, 2019) at Table ALT C-4.

eligible for our analysis of threat of material injury in these staggered investigations. We found in the first LDWP investigations that there is a reasonable overlap of competition between subject imports of stainless steel LDW pipe from all subject countries (except Greece) and between subject imports from each subject source and the domestic like product, and there is no information on the record to suggest that this reasonable overlap in competition will not continue into the imminent future.¹¹⁴ We adopt and incorporate by reference our findings and analysis with respect to cumulation for threat, as modified by the exclusion of imports of stainless steel LDW pipe from Turkey, for our analysis of whether there is a threat of material injury to the domestic industry by reason of subject imports from Canada and Korea. We conclude that the exclusion of imports from Turkey does not change our finding that it is appropriate to exercise our discretion to cumulate subject imports from all sources (except Greece and Turkey) for our analysis of whether there is a threat of material injury to the domestic stainless steel LDW pipe industry.

Moreover, we adopt and incorporate by reference here our findings and analysis with respect to threat of material injury by reason of subject imports of stainless steel LDW pipe in the first LDWP investigations, as modified by the exclusion of imports of stainless steel LDW pipe from Turkey.¹¹⁵ As we indicated in the first LDWP investigations, the record is limited, particularly concerning the foreign industries producing stainless steel LDW pipe and pricing data. Based on our analysis and findings in the first LDWP investigations, as modified by the exclusion of imports from Turkey, we find neither a likelihood of substantially increased volumes of subject imports nor that subject imports are entering at prices that are likely to have a significant price-depressing or price-suppressing effect. Given our conclusion that subject imports likely will not substantially increase and likely will not have significant adverse price effects in the imminent future, we find that cumulated subject imports from Canada, China, India, and Korea will not likely have a significant adverse impact on the performance of the domestic industry.

For all of these reasons, we find that the domestic industry producing stainless steel LDW pipe is not threatened with material injury by reason of subject imports of stainless steel LDW pipe from Canada and Korea.

¹¹⁴ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 77.

¹¹⁵ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 78-80.

V. Conclusion

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of imports of LDW line pipe from Canada, Korea, and Turkey found by Commerce to be sold in the United States at less than fair value and subsidized by the government of Korea. We determine that that an industry in the United States is threatened with material injury by reason of imports of LDW line pipe from Greece that are sold in the United States at less than fair value. We find that imports of LDW line pipe from Turkey that are subsidized by the government of Turkey are negligible and terminate that investigation with respect to LDW line pipe.¹¹⁶

We further determine that an industry in the United States is materially injured by reason of imports of LDW structural pipe from Canada, Korea, and Turkey found by Commerce to be sold in the United States at less than fair value and subsidized by the governments of Korea and Turkey. We find that imports of LDW structural pipe from Greece that are sold in the United States at less than fair value are negligible and terminate that investigation with respect to LDW structural pipe.

We also determine that an industry in the United States is not materially injured or threatened with material injury by reason of imports of stainless steel LDW pipe from Canada and Korea sold in the United States at less than fair value and subsidized by the government of Korea. We find that imports of stainless steel LDW pipe from Greece and Turkey that are sold in the United States at less than fair value and subsidized by the government of Turkey are negligible and terminate those investigations with respect to stainless steel LDW pipe.

¹¹⁶ Commissioner Kearns finds that LDW line pipe and LDW structural pipe are a single domestic like product (LDW carbon and alloy steel pipe) and determines that an industry in the United States is materially injured by reason of imports of LDW carbon and alloy steel pipe from Canada, Korea and Turkey sold in the United States at less than fair value and subsidized by the government of Korea. Commissioner Kearns finds that that an industry in the United States is threatened with material injury by reason of subject imports from Greece that are sold in the United States at less than fair value. Commissioner Kearns finds that imports of LDW carbon and alloy steel pipe from Turkey that are subsidized by the government of Turkey are negligible and terminates that investigation with respect to LDW carbon and alloy steel pipe. *See Separate Views of Commissioner Jason E. Kearns.*

Separate Views of Commissioner Jason E. Kearns

Based on the record in the final phase of these investigations, I find that an industry in the United States is materially injured by reason of imports of carbon and alloy (other than stainless) steel large diameter welded pipe (“nonstainless LDWP”) from Canada, Korea, and Turkey.¹ I also find that this industry is threatened with material injury by imports from Greece.

I find that imports of nonstainless LDWP from Greece are negligible, but not for purposes of threat of material injury. I further find that imports of nonstainless LDWP from Turkey subject to the countervailing duty investigation are negligible and are negligible for purposes of threat of material injury. Thus, I terminate the countervailing duty investigation of nonstainless LDWP from Turkey.

I concur with my colleagues in finding that an industry in the United States is neither materially injured nor threatened with material injury by reason of imports of stainless steel pipe from Canada and Korea. I concur with my colleagues in the termination of the antidumping and countervailing duty investigations of stainless steel pipe from Turkey and the antidumping duty investigation of stainless steel pipe from Greece.

In reaching these determinations, I draw heavily on my analysis of domestic like product, domestic industry, and cumulation that I already performed in *Large Diameter Welded Pipe from China and India* (Inv. Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final)). In those investigations, I joined sections I, II A, B, and C, and the like product views regarding stainless LDWP, in the Views of the Commission. I do so again here. As in the China and India investigations, I write separately for nonstainless LDWP with respect to the definition of the domestic like product, domestic industry, negligibility, cumulation, and material injury.

In essence, I differ with the majority of the Commission in just two respects. First, whereas the majority defines LDW structural pipe and LDW line pipe as separate like products, I find that all nonstainless LDWP is one domestic like product. (I agree with the majority that LDW stainless steel structural pipe is a separate like product.) Second, I find that appropriate circumstances do not exist to exclude Evraz Oregon from the domestic industry.

I. Domestic Like Product

I refer to my prior opinion in *Large Diameter Welded Pipe from China and India* (Inv. Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final)).

II. Domestic Industry

I refer to my prior opinion in *Large Diameter Welded Pipe from China and India* (Inv. Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final)).

¹ As noted, subject imports from Korea were found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value and subsidized by the government of Korea, although imports from two Korean producers (Husteel and Hyundai) were assessed *de minimis* margins in the countervailing duty investigation. Subject imports from Canada and Greece were found by Commerce to be sold in the United States at less than fair value. Subject imports from Turkey were found by Commerce to be sold in the United States at less than fair value and subsidized by the government of Turkey, although imports from one Turkish producer (Borusan) were assessed a *de minimis* margin in the countervailing duty investigation.

III. Negligibility

I find that imports of nonstainless LDWP from Greece are negligible, but not for purposes of threat of material injury. I further find that imports of nonstainless LDWP from Turkey subject to the countervailing duty investigations are negligible and are negligible for purposes of threat of material injury.

The record indicates that subject imports from Greece of nonstainless LDWP were below the 3 percent negligible threshold during the applicable 12-month period with respect to the antidumping duty investigation. Subject imports from Greece accounted for 1.3 percent of all imports of nonstainless LDWP in the antidumping duty investigation.²

The record also indicates that subject imports from Turkey of nonstainless LDWP were below the 3 percent negligible threshold during the applicable 12-month period with respect to the countervailing duty investigation. Subject imports from Turkey accounted for *** percent of all imports of nonstainless LDWP in the countervailing duty investigation.³

As noted in the Views of the Commission in *Large Diameter Welded Pipe from China and India* (Inv. Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Preliminary)), large orders of LDWP had been placed for delivery in 2018. Subject imports of nonstainless LDWP from Greece were 101,607 short tons in interim 2018, 23.4 percent of total imports in interim 2018.⁴ By June 2018, subject imports from Greece were 11.2 percent of total imports imported in the 12 month period.⁵

However, subject imports from Turkey remained under the threshold in interim 2018. Subject imports from Turkey fell to 4,985 short tons in interim 2018, 1.1 percent of total imports in that period.⁶ Over January to June 2018, subject imports from Turkey were between *** and *** of total imports over the 12 month periods with respect to the countervailing duty investigation.⁷

IV. Cumulation

Since I defined two separate domestic like products, I consider cumulation separately for nonstainless LDWP and stainless steel LDW pipe. In accordance with my negligibility findings in the current investigations, I do not consider subject imports of nonstainless LDWP from Greece and Turkey (countervailing duty) eligible for cumulation for the relevant present material injury analyses. Only subject imports of nonstainless LDWP from Canada, China, India, Korea, and Turkey (antidumping only)⁸ are eligible for cumulation for my present material

² CR/PR (INV-RR-022) (Apr. 1, 2019) at Table D-10.

³ CR/PR (INV-RR-022) (Apr. 1, 2019) at Table D-10. I do not aggregate imports from Greece subject to the antidumping duty investigation with those from Turkey subject to the countervailing duty investigation.

⁴ CR/PR (INV-RR-022) (Apr. 1, 2019) at Table C-6.

⁵ CR/PR (INV-RR-022) (Apr. 1, 2019) at Table D-10.

⁶ CR/PR (INV-RR-022) (Apr. 1, 2019) at Table C-6.

⁷ CR/PR (INV-RR-022) (Apr. 1, 2019) at Table D-10.

⁸ The antidumping duty investigation on imports of nonstainless LDWP from Turkey includes all subject imports from Turkey, including those imports Commerce found to be *de minimis* for Turkish producer Borusan in the countervailing duty investigation on nonstainless LDWP from Turkey.

injury analysis in the current investigations. Therefore, my current cumulation analysis for imports of nonstainless LDWP differs from my corresponding analysis in the first investigations since such imports from Greece and Turkey (countervailing duty) are no longer eligible for cumulation.

I adopt my prior finding on cumulation (from *Large Diameter Welded Pipe from China and India* (Inv Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final)) to cumulate subject imports of nonstainless LDWP from Canada, China, India, Korea, and Turkey (antidumping), as modified by the exclusion of evidence regarding nonstainless LDWP from Greece and Turkey (countervailing duty) from that analysis.

I adopt the views of the Commission majority in cumulating stainless LDWP from Canada, China, India, and Korea.

V. Material Injury by Reason of Subject Imports

A. Volume of Cumulated Subject Imports of Nonstainless LDWP

Subject import volume was 717,631 short tons in 2015, and fell to 370,219 short tons in 2016 before rebounding to 825,310 short tons in 2017. Thus, subject import volume increased 15.0 percent over 2015-2017. In interim 2018, subject imports were 215,439 short tons, down from 400,556 in interim 2017. Over 2015-2017, subject imports fell from *** percent of the U.S. market in 2015 to *** percent in 2016, before rising to *** percent in 2017. In interim 2018, subject imports were *** percent of the market, down from *** percent in interim 2017.⁹

I concur with my colleagues' analysis of respondents' arguments that two large projects (Mountain Valley and Valley Crossing) accounted for much of the volume of subject imports in 2017 and interim 2018. Accordingly, I have not subtracted the volume of subject imports for these projects from the total volume of cumulated subject nonstainless LDWP imports as respondents have urged.

Thus, for nonstainless LDWP, I find that the volume of subject imports, which varied between roughly *** and *** of U.S. consumption, is significant, both in absolute terms and relative to U.S. consumption.

B. Price Effects of the Subject Nonstainless LDWP Imports

I join my colleagues' opinion for a discussion of the statutory requirements for evaluating price effects, and for a description of the process used to collect bid data in these investigations.

Commission bid data show evidence of underselling by subject imports. Cumulated subject import quotes were lower than domestic producers' bids in 47 of 82 instances.¹⁰ Subject imports won the bidding in 22 instances where there was more than one source

⁹ CR/PR (INV-RR-022) (Apr. 1, 2019) at Table C-6 (Subject sources less Greece).

¹⁰ CR/PR (INV-QQ-137) (Nov. 26, 2018) at Table V-4 (not including Greece).

reported.¹¹ In 16 of the 22 instances when subject imports won the bidding, the bid of the subject imports was lower than the domestic producer's bid for a LDWP project.¹² In 10 of the 16 instances where the bid of the subject imports was lower than a domestic producer's bid, the winning bid from the subject imports was also the lowest bid submitted.¹³ Subject imports only won in four instances in which they were higher priced than a domestic producer's bid.¹⁴

I have also considered the lost sales data for nonstainless LDWP. Thirty-six purchasers reported they had purchased nonstainless LDWP from subject sources instead of the domestic product. Thirty-two purchasers indicated that the nonstainless LDWP from subject sources was lower-priced. Further, 22 of the 32 purchasers indicated that the lower price of the subject imports was a primary reason for their decision to purchase subject imports.¹⁵ These 22 purchasers reported purchasing a total of *** short tons of subject imports (not including subject imports from Greece) during January 2015-June 2018.¹⁶ I note that these results are consistent with data in part II of the staff report showing that U.S. and subject product were judged comparable by most purchasers, except on price, in which U.S. product was judged higher-priced by most purchasers for most subject countries. Additionally, I concur with my colleagues in finding that the *** short ton Valley Crossing project was lost to lower-priced subject imports.

My colleagues analyze LDW line pipe and LDW structural pipe separately, and in both cases, do not find price depression or price suppression. For nonstainless LDWP, overall consumption has fallen (as for LDW line pipe), and unit COGS fell at roughly the same rate as U.S. producers' average unit values over 2015-2017, before rising slightly less than U.S. average unit values did from interim 2017 to interim 2018.¹⁷

I have considered the significant underselling reflected in the bid data and the lost sales involving a substantial volume of nonstainless LDWP and find that the underselling led to substantial volumes of subject imports of nonstainless LDWP purchased instead of the domestic product. As a result of this underselling, subject imports gained market share at the expense of the domestic industry.

Borusan argues that, upon closer examination, some of the lost sales confirmations were qualified by responding purchasers.¹⁸ My conclusion does not depend on an exact level of lost sales confirmations. Instead, the lost sales, along with the bid and purchaser comparison data, indicate that subject imports are competing strongly with U.S. product, that price is a primary factor in such competition, and that subject imports are often lower-priced than U.S. product. In sum, a substantial portion of apparent U.S. consumption was captured by the cumulated subject imports for price-related reasons.

¹¹ CR/PR (INV-QQ-142) (Nov. 29, 2018) at Tables V-5 and D-19 (not including Greece).

¹² CR/PR (INV-QQ-142) (Nov. 29, 2018) at Table V-5 and D-19 (not including Greece).

¹³ CR/PR (INV-QQ-142) (Nov. 29, 2018) at Table V-5 and D-19 (not including Greece).

¹⁴ CR/PR (INV-QQ-142) (Nov. 29, 2018) at Table V-5 and D-19 (not including Greece).

¹⁵ CR/PR (INV-QQ-137) (Nov. 26, 2018) at Table V-9, ***.

¹⁶ CR/PR (INV-QQ-137) (Nov. 26, 2018) at Table V-9.

¹⁷ CR/PR (INV-RR-022) (Apr. 1, 2019) at Table C-6. While I note that there was underselling and price declines, I cannot conclude that there was significant price depression.

¹⁸ Borusan's posthearing brief, pp. 7-8.

For the foregoing reasons, I find that cumulated subject imports of nonstainless LDWP have had significant adverse price effects on the domestic industry.

C. Impact of the Subject Imports

I refer to my colleagues' opinion for a discussion of the statutory requirements for examining the impact of subject imports on the domestic industry.

I adopt and incorporate by reference my findings and analysis with respect to the impact of cumulated subject imports of nonstainless LDWP on the domestic industry in the first investigations as modified by the exclusion of nonstainless LDWP from Greece as subject imports.¹⁹ Accordingly, I find that cumulated subject imports from Canada, China, India, Korea, and Turkey had a significant adverse impact on the domestic industry. In particular, the trends for cumulated subject imports and our responses to party arguments are the same, with the exclusion of imports from Greece from the cumulated subject imports.²⁰

For the foregoing reasons, I find that the domestic industry producing nonstainless LDWP is suffering material injury by reason of cumulated subject imports from Canada, China, India, Korea, and Turkey. Accordingly, I make an affirmative determination of present material injury in the antidumping duty investigations of nonstainless LDWP from Canada, Korea, and Turkey and the countervailing duty investigation of nonstainless LDWP from Korea.

VI. Threat

With subject imports of nonstainless LDWP from Turkey (countervailing duty) negligible for threat, subject imports of nonstainless LDWP from Canada, China, Greece, India, Korea, and Turkey (antidumping) are eligible for our analysis of threat in these staggered investigations. I found in the first investigations regarding subject imports from China and India that there is a reasonable overlap of competition between subject imports of nonstainless LDWP from all six subject countries and between subject imports from each subject source and the domestic like product.²¹ There is no information on the record to suggest that the reasonable overlap of competition between and among subject imports and the domestic like product will not continue into the imminent future. Since the subject imports from the same six subject countries are eligible for cumulation here for my threat analysis, I adopt and incorporate by reference my findings and analysis with respect to cumulation for present material injury for nonstainless LDWP, as modified by the exclusion of imports of nonstainless LDWP from Turkey

¹⁹ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 112-113. We also incorporate by reference our responses to party arguments regarding the impact of cumulated subject imports on the domestic industry.

²⁰ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 112-113. With respect to other factors, nonsubject imports (including Greece) data changed slightly but still declined each full year of the POI in absolute terms and as a percentage of apparent U.S. consumption. CR/PR (INV-RR-022) (Apr. 1, 2019) at Table C-6.

²¹ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 106-107.

(countervailing duty),²² for my analysis of whether there is a threat of material injury to the domestic industry from subject imports from Greece.

A. Likely Volume of Cumulated Subject Imports of Nonstainless LDWP

I found in section V.A. above that the volume of cumulated subject imports from Canada, China, India, Korea, and Turkey over the POI was significant in absolute terms and relative to consumption. The addition of subject imports from Greece to the cumulated volume of subject imports for purposes of my threat analysis lends further support to my findings regarding the likely volume of subject imports.²³

First, the data indicate that there is substantial existing unused capacity in the cumulated subject industries. The combined capacity for the responding industries in Canada, Greece, India, Korea, and Turkey amounted to 6.2 million short tons in 2017.²⁴ This figure is more than *** times total subject imports in 2017 and equivalent to more than twice the volume of total apparent U.S. consumption in 2017.²⁵ Excess capacity for the five countries was more than 4 million short tons in 2017.²⁶ This amount far exceeds apparent U.S. consumption, which totaled *** short tons in 2017.²⁷

The producers in the subject countries export in significant quantities, indicating the likelihood of substantially increased subject imports into the United States. Total export shipments of the industries in Canada, Greece, India, Korea, and Turkey increased from 1.2 million short tons in 2015 to 1.4 million short tons in 2017.²⁸ These data on subject producers' aggregate excess capacity and exports do not include data for the industry in China because no subject producers in China responded to the Commission's questionnaire.²⁹

Public data indicate, however, that China has been one of the world's largest LDWP exporters. China's global exports of LDWP (which includes nonstainless LDWP) were 1.5 million short tons in 2015, and 1.3 million short tons in 2016, or 13.6 percent of total global exports in 2014, 18.4 percent in 2015, and 20 percent in 2016.³⁰

²² The antidumping duty investigation with respect to nonstainless LDWP for Turkey includes all subject imports from Turkey, including those Commerce found to be *de minimis* for Turkish producer Borusan in the countervailing duty investigation for nonstainless LDWP from Turkey.

²³ I previously found that the volume cumulated subject imports from all six subject countries, including Greece, were significant in absolute terms and relative to consumption for present material injury purposes. *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 110.

²⁴ Derived from CR/PR (INV-QQ-137) (Nov. 26, 2018) at Tables VII-3, VII-10, VII-14, VII-18, VII-23. No capacity information is available for China.

²⁵ Derived from CR/PR (INV-RR-022) (Apr. 1, 2019) at Table C-6.

²⁶ Derived from CR/PR (INV-QQ-137) (Nov. 26, 2018) at VII-3, VII-10, VII-14, VII-18, VII-23. No capacity information is available for China.

²⁷ Derived from CR/PR (INV-RR-022) (Apr. 1, 2019) at Table C-6.

²⁸ Derived from CR/PR (INV-QQ-137) (Nov. 26, 2018) at Tables VII-3, VII-10, VII-14, VII-18, VII-23.

²⁹ Exports from China of welded pipe over 16 inches in diameter totaled 876,801 short tons in 2017 according to public sources. CR/PR (INV-QQ-137) (Nov. 26, 2018) at Table VII-7.

³⁰ CR/PR (INV-QQ-137) (Nov. 26, 2018) at Table VII-31.

The data also indicate that there was a significant rate of increase in cumulated subject import market penetration during the POI. Despite an overall decline in cumulated subject import volume from 2015 to 2017, subject import volume increased by 82.0 percent from 2016 to 2017.³¹ Cumulated subject import market share also declined from 2015 to 2016, but was higher in 2017, at *** percent, than in 2016, at *** percent, a rise of almost *** percentage points.³² In comparison, apparent U.S. consumption increased by only *** percent from 2016 to 2017.³³

Importantly, U.S. importers reported that they have already arranged for over *** short tons of subject nonstainless LDWP to be imported in the second half of 2018.³⁴ Importers also reported additional arranged subject imports for 2019.³⁵ These arranged imports alone indicate that increased volumes of subject imports were likely in the second half of 2018 and that the Section 232 measures have not halted the increase in subject imports. Additionally, nonstainless LDWP from the subject countries is subject to antidumping or countervailing duty measures in third countries.³⁶

In light of the significant cumulated subject import volume and market penetration observed during the POI, the significant cumulated excess capacity of the subject industries and their demonstrated ability to supply export markets, the potential for product shifting, and the already arranged subject imports, I find that the significant volumes of cumulated subject imports into the U.S. market that occurred during the POI will likely continue in the imminent future.

B. Likely Price Effects of Cumulated Subject Nonstainless LDWP

As explained in section V.B, I found that low-priced cumulated subject imports of nonstainless LDWP from Canada, China, India, Korea, and Turkey underbid domestic producers during the POI, and as a result, purchasers purchased large volumes of subject imports instead of domestically produced nonstainless LDWP. I found that subject imports had significant price effects. When I add subject imports of nonstainless LDWP from Greece to the cumulated volume of subject imports for purposes of my threat analysis, my likely price effects findings are strengthened.³⁷

I have found that cumulated subject imports are likely to continue to enter the U.S. market in increasing and significant volumes in the imminent future. The substantially increased volumes of subject imports will likely continue to be sold at lower prices and displace

³¹ CR/PR (INV-RR-022) (Apr. 1, 2019) at Table C-6. Subject imports were 21.3 percent lower in interim 2018 than in interim 2017. *Id.*

³² See CR/PR (INV-RR-022) (Apr. 1, 2019) at Table C-6.

³³ See CR/PR (INV-RR-022) (Apr. 1, 2019) at Table C-6.

³⁴ CR/PR (INV-QQ-137) (Nov. 26, 2018) at Table VII-29.

³⁵ Subject imports of LDW line pipe (which are included in nonstainless LDWP) totaling over *** short tons have been arranged for the first half of 2019. CR/PR (INV-QQ-142) (Nov. 29, 2018) at Tables D-15-16.

³⁶ The record indicates that Mexico and Canada have imposed antidumping or countervailing duty orders on similar line pipe products to those covered under these investigations from India, China, and Korea, among other countries. See CR/PR (INV-QQ-137) (Nov. 26, 2018) at Table VII-30.

³⁷ I previously found that cumulated subject imports of nonstainless LDWP from all six subject countries, including Greece, have had significant adverse price effects on the domestic industry. *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 111-112.

sales of the domestic like product, as they did during the POI. The likely low prices of the subject imports, in turn, are likely to increase demand for the subject imports and cause a reduction in the domestic industry's production, sales, and shipments in the imminent future. Accordingly, I find that cumulated subject imports are likely to enter the U.S. market in the imminent future at prices that are likely to increase demand for further imports.

C. Likely Impact of Cumulated Subject Imports of Nonstainless LDWP

I found in section V.C above that cumulated subject imports from Canada, China, India, Korea, and Turkey had a significant adverse impact on the domestic industry. I found that, as a result, the nonstainless LDWP domestic industry was suffering material injury.

I find that this is likely to continue in the imminent future because cumulated subject imports, including subject imports from Greece, are likely to continue to enter the U.S. market in increasing and significant volumes and likely to have price effects on the domestic product in the imminent future. I conclude that the significant volumes of low-priced subject imports of nonstainless LDWP will likely cause the domestic industry to lose additional sales and market share, which will lead to adverse effects on the domestic industry's revenues and financial performance as they did during the POI. Although duties under Section 232 cover subject imports from all sources, the duties do not appear likely to slow the influx of subject imports. Moreover, the Section 232 duties have increased raw material costs for the domestic producers, rendering them more susceptible to further injury from the subject imports.³⁸

I have already considered other factors, including demand and nonsubject imports, and concluded that any injury that may be attributable to these factors is distinct from the injury attributable to the subject imports.³⁹ This analysis is equally pertinent to likely conditions in the imminent future.⁴⁰ I therefore find that further subject imports of nonstainless LDWP are imminent and that material injury by reason of subject imports would occur unless orders are issued on subject imports. Accordingly, I make an affirmative determination of a threat of material injury in the antidumping duty investigation of nonstainless LDWP from Greece.

VII. Conclusion

For the foregoing reasons, I find that the domestic industry producing nonstainless LDWP is suffering material injury by reason of subject imports from Canada, Korea, and Turkey found by Commerce to be sold in the United States at less than fair value and subsidized by the government of Korea. I find that the domestic industry is threatened with material injury by

³⁸ CR (INV-QQ-137) (Nov. 26, 2018) at II-3; PR at II-3. The domestic industry has described numerous anticipated effects of increased volumes of subject imports of nonstainless LDWP. See CR/PR (INV-QQ-137) (Nov. 26, 2018) at Table VI-7.

³⁹ *Final Determinations on LDWP from China and India*, USITC Pub. 4859 at 113.

⁴⁰ Oil and gas prices have fluctuated, but the rig count remains lower than it was at the beginning of the POI. See CR/PR (INV-QQ-137) (Nov. 26, 2018) at Figs II-1 and II-2. Total line pipe projects are forecast to decline slightly in 2019, but miles of pipeline are projected to increase substantially. See CR/PR (INV-QQ-137) (Nov. 26, 2018) at Table II-4. Thus, demand may be stronger in the imminent future.

reason of nonstainless LDWP subject imports from Greece that are sold in the United States at less than fair value. I find that subject imports of nonstainless LDWP from Turkey that are subsidized by the government of Turkey are negligible and terminate that investigation.

PART I: INTRODUCTION

BACKGROUND

These investigations result from petitions filed on January 17, 2018 with the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (“USITC” or “Commission”) by American Cast Iron Pipe Company (ACIPCO), Birmingham, Alabama; Berg Steel Pipe Corp. (Berg), Panama City, Florida; Berg Spiral Pipe Corp. (Berg), Mobile, Alabama; Dura-Bond Industries, Inc. (Dura-Bond), Export, Pennsylvania; Skyline Steel (Skyline), Newington, Virginia; and Stupp Corporation (Stupp), Baton Rouge, Louisiana, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized and less-than-fair-value (“LTFV”) imports of large diameter welded pipe (“LDWP”) from Canada (LTFV only), China, Greece (LTFV only), India, Korea, and Turkey. The following tabulation provides information relating to the background of these investigations.^{1 2}

Effective/applicable date	Action
January 17, 2018	Petitions filed with Commerce and the Commission; institution of Commission investigations (83 FR 3187, January 23, 2018)
February 9, 2018	Commerce’s notice of AD initiation (83 FR 7154, February 20, 2018); Commerce’s notice of CVD initiation (83 FR 7148, February 20, 2018)
March 5, 2018	Commission’s preliminary determinations
June 29, 2018	Commerce’s preliminary countervailing duty determinations on imports from China (83 FR 30695, June 29, 2018), India (83 FR 30690, June 29, 2018), Korea (83 FR 30690, June 29, 2018), and Turkey (83 FR 30697, June 29, 2018)
August 27, 2018	Commerce’s preliminary antidumping duty determinations on imports from Canada (83 FR 43649, August 27, 2018), China (83 FR 43644, August 27, 2018), Greece (83 FR 43640, August 27, 2018) India (83 FR 43653, August 27, 2018), Korea (83 FR 43651, August 27, 2018), and Turkey (83 FR 43646, August 27, 2018)
August 27, 2018	Scheduling of final phase of Commission investigations (83 FR 45279, September 6, 2018)
November 6, 2018	Commission’s hearing
November 14, 2018	Commerce’s final determinations China: CVD and AD (83 FR 56804 and 83 FR 56816); and India: CVD and AD (83 FR 56819 and 83 FR 56811)
December 6, 2018	Commission’s vote (China: AD & CVD; India AD & CVD)
January 30, 2019	Commission’s determinations and views, China: AD and CVD; India AD and CVD (84 FR 1785, February 5, 2019)

¹ Pertinent *Federal Register* notices are referenced in appendix A, and may be found at the Commission’s website (www.usitc.gov).

² A list of witnesses appearing at the hearing is presented in appendix B of this report.

Effective/applicable date	Action
February 27, 2019	Commerce’s final determinations, Canada: AD (84 FR 6378); Greece: AD (84 FR 6364); Korea: CVD and AD (84 FR 6369 and 84 FR 6374); and Turkey: AD and CVD (84 FR 6362 and 84 FR 6367)
April 2, 2019	Commission’s vote (Canada: AD; Greece: AD; Korea: AD and CVD; Turkey: AD and CVD)
April 15, 2019	Commission’s views (Canada: AD; Greece: AD; Korea: AD and CVD; Turkey: AD and CVD)

Note.—Due to the lapse in appropriations and ensuing cessation of Commission operations, all import injury investigations conducted under authority of Title VII of the Tariff Act of 1930 accordingly have been tolled pursuant to 19 U.S.C. §§ 1671d(b)(2), 1673d(b)(2).

The information contained in this report is intended to be used in conjunction with data presented in the Commission’s report of *Large Diameter Welded Pipe from China and India: Investigation Nos. 701-TA-593-594 and 731-TA-1402 and 1404 (Final)*, USITC Publication 4859, January 2019 and its corresponding confidential version contained in memorandum No. INV-QQ-0137, *Large Diameter Welded Pipe from Canada, China, Greece, India, Korea, and Turkey: Investigation Nos. 701-TA-593-596 and 731-TA-1401-1406 (Final)*, and revised by memoranda INV-QQ-142 (November 29, 2018) and INV-QQ-147 (December 5, 2018).³ No new information except for Commerce’s final determinations concerning large diameter welded pipe from Canada, Greece, Korea, and Turkey and party comments thereon is included in the record for these proceedings.⁴

NATURE AND EXTENT OF SUBSIDIES AND SALES AT LTFV

Subsidies

On June 29, 2018, Commerce published notice in the Federal Register of its preliminary determinations of countervailable subsidies for producers and exporters of product from Korea, and Turkey.⁵ On November 14, 2018, Commerce published notice in the Federal Register of its

³ Appendix C of this report reproduces summary data referenced in the Commission’s views. Appendix D presents quantity-based data addressing negligibility drawn from the existing record and reflecting final Commerce CVD determinations.

⁴ The Commission received comments from the collective petitioners (American Cast Iron Pipe Company, Berg Steel Pipe Corp., Berg Spiral Pipe Corp., Dura-Bond Industries, and Stupp Corporation, individually and as members of the American Line Pipe Producers Association; Greens Bayou Pipe Mill, LP; JSW Steel (USA) Inc.; Skyline Steel; Trinity Products LLC; and Welspun Tubular LLC), Evraz Inc. NA (“Evraz”) a producer and exporter of the subject merchandise in Canada, and Turkish producer and exporter Borusan Mannesmann Boru Sanayi ve Ticaret A.S. and Borusan Istikbal Ticaret T.A.S. (collectively “Borusan”).

⁵ *Large Diameter Welded Pipe from Korea: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination with Final Antidumping Duty Determination*, 83 FR 30693, June 29, (continued...)

final determinations of countervailable subsidies for producers and exporters of product from China and India.⁶ On February 27, 2019, Commerce published notice in the Federal Register of its final determinations of countervailable subsidies for producers and exporters of product from Korea and Turkey.⁷

Commerce determined the following programs in the Republic of Korea to be countervailable:⁸

1. Demand Response Resources Program
2. Korean Export-Import Bank Subsidy Programs
3. Modal Shift Program
4. Tax Programs under the Restriction of Special Taxation Act (RSTA)
 - a. RSTA Article 25 (2) and RSTA Article 25 (4)
 - b. RSTA Article 26
 - c. RSTA Article 78

Commerce determined the following programs in the Republic of Turkey to be countervailable:⁹

1. Provision of Hot-Rolled Steel (HRS) for Less than Adequate Remuneration (LTAR)
2. Deductions from Taxable Income for Export Revenue
3. Export Financing: Rediscount Program
4. Investment Encouragement Program (IEP): Customs Duty and VAT Exemptions
5. Property Tax Law 1319: Exemption from Property Tax
6. Inward Processing Certificate Exemption Program
7. Free Zones Law 3218: Corporate Income Tax Exemptions
8. Free Zones Law 3218: Exemption from Income Tax on Wages Paid to Workers

(...continued)

2018. *Large Diameter Welded Pipe from Turkey: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination with Final Antidumping Duty Determination*, 83 FR 30697, June 29, 2018.

⁶ *Large Diameter Welded Pipe from China: Final Affirmative Determination*, 83 FR 56804, November 14, 2018. *Large Diameter Welded Pipe from India: Final Affirmative Determination*, 83 FR 56819, November 14, 2018.

⁷ *Large Diameter Welded Pipe from the Republic of Turkey: Final Affirmative Determination*, 84 FR 6367, February 27, 2019. *Large Diameter Welded Pipe from the Republic of Korea: Final Affirmative Determination*, 84 FR 6372, February 27, 2019.

⁸ *Large Diameter Welded Pipe from the Republic of Korea: Final Affirmative Determination*, 84 FR 6372, February 27, 2019 (referencing *Issues and Decision Memorandum from the Final Affirmative Determination in the Countervailing Duty Investigation of Large Diameter Welded Pipe from the Republic of Korea*, February 19, 2019).

⁹ *Large Diameter Welded Pipe from the Republic of Turkey: Final Affirmative Determination*, 84 FR 6367, February 27, 2019 (referencing *Issues and Decision Memorandum for the Final Affirmative Determination in the Countervailing Duty Investigation of Large Diameter Welded Pipe from Turkey*, February 19, 2019).

Table I-1 presents Commerce's findings of subsidization of LDWP in China, India, Korea, and Turkey.

Table I-1
LDWP: Commerce's subsidy determinations with respect to imports from China, India, Korea, and Turkey

Entity	Preliminary countervailable subsidy margin (percent)	Final countervailable subsidy margin (percent)
China		
Hefei Zijin Steel Tube Manufacturing Co	198.49	198.49
Hefei Ziking Steel Pipe	198.49	198.49
Panyu Chu Kong Steel Pipe Co. Ltd.	198.49	198.49
All others	198.49	198.49
India		
Bhushan Steel	541.15	541.15
Welspun Trading Limited	541.15	541.15
All others	541.15	541.15
Korea		
Husteel Co., Ltd	(de minimis) 0.01	(de minimis) 0.01
Hyundai Steel Company	(de minimis) 0.44	(de minimis) 0.44
SeAH Steel Corporation	3.31	27.42
All others	3.31	9.29
Turkey		
HDM Celik Boru Sanayi ve Ticaret A.S.	3.76	3.72
Borusan Mannesmann BoruSanayi ve Ticaret A.S.	1.08	(de minimis) 0.92
All others	1.89	3.72

Source: 83 FR 30695, 83 FR 30690, 83 FR 30693, 83 FR 30697 June 29, 2018; 83 FR 56805 and 83 FR 56820, November 14, 2018, and 84 FR 6367 and 84 FR 6369, February 27, 2019.

Sales at LTFV

On June 29, 2018, Commerce published notice in the Federal Register of its preliminary determinations of sales at LTFV with respect to imports from Canada, China, Greece, India, Korea, and Turkey.¹⁰ On November 14, 2018, Commerce published notice in the Federal Register of its final determinations of sales at LTFV with respect to imports from China and India.¹¹ On February 27, 2019, Commerce published notice in the Federal Register of its

¹⁰ *Large Diameter Welded Pipe from Canada, Korea, and Turkey: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Determination*, 83 FR 43649, 83 FR 43641, 83 FR 43652, and 83 FR 43646, June 29, 2018. *Large Diameter Welded Pipe from Greece: Amended Preliminary Determination of Sales at Less than Fair Value*; 83 FR 48795, September 27, 2018.

¹¹ *Large Diameter Welded Pipe from China and India: Final Determination of Sales at Less than Fair Value*; 2017, 83 FR 56819 and 83 FR 56811, November 14, 2018.

determinations of sales at LTFV with respect to imports from Canada, Greece, Korea, and Turkey.¹² Table I-2 presents Commerce’s dumping margins with respect to imports of product from Canada, China, Greece, India, Korea, and Turkey.

Table I-2

LDWP: Commerce’s weighted-average LTFV margins with respect to imports from Canada, China, Greece, India, Korea, and Turkey

Entity	Preliminary dumping margin (percent)	Final dumping margin (percent)
Canada		
Evraz Inc. NA	24.38	12.32
All-Others	24.38	12.32
China		
China-wide Entity	132.63	132.63
Greece		
Corinth Pipeworks Pipe Industry S.A	7.45	9.96
All-Others	7.45	9.96
India		
Bhushan Steel	50.55	16.85
Welspun Trading Limited	50.55	16.85
All-Others	50.55	16.85
Korea		
Hyundai RB Co., Ltd	14.97	14.97
SeAH Steel Corporation	22.21	7.03
Samkang M&T Co., Ltd	21.21	20.39
All-Others	20.13	9.30
Turkey		
Borusan Mannesmann Boru Sanayi ve Ticaret A.S	5.29	4.55
HDM Celik Boru Sanayi ve Ticaret A.S	3.45	5.05
All-Others	4.83	4.68

Source: 83 FR 43649, 83 FR 43644, 83 FR 43641, 83 FR 43655, 83 FR 43652, 83 FR 43646, June 29, 2018; 83 FR 56819 and 83 FR 56811, November 14, 2018, and 84 FR 6362, 84 FR 6366, 84 FR 6374, and 84 FR 6378, February 27, 2019.

¹² *Large Diameter Welded Pipe from Canada, Greece, Korea, and Turkey: Final Determination of Sales at Less than Fair Value; 2017*, 84 FR 6362, 84 FR 6366, 84 FR 6374, and 84 FR 6378, February 27, 2019.

APPENDIX A

FEDERAL REGISTER NOTICES

The Commission makes available notices relevant to its investigations and reviews on its website, www.usitc.gov. In addition, the following tabulation presents, in chronological order, *Federal Register* notices issued by the Commission and Commerce during the current proceeding.

Citation	Title	Link
83 FR 3187 January 23, 2018	<i>Large Diameter Welded Pipe From India, the People's Republic of China, the Republic of Korea, and the Republic of Turkey: Institution of Antidumping and Countervailing Investigations and Scheduling of Preliminary Phase Investigations</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-01-23/pdf/2018-01157.pdf
83 FR 7154 February 20, 2018	<i>Large Diameter Welded Pipe From India, the People's Republic of China, the Republic of Korea, and the Republic of Turkey: Initiation of Countervailing Duty Investigations</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-02-20/pdf/2018-03304.pdf
83 FR 10748 March 12, 2018	<i>Large Diameter Welded Pipe From Canada, China, Greece, India, Korea, and Turkey Determinations</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-03-12/pdf/2018-04848.pdf
83 FR 13946 April 2, 2018	<i>Large Diameter Welded Pipe From India, the People's Republic of China, the Republic of Korea, and the Republic of Turkey: Postponement of Preliminary Determinations in the Countervailing Duty Investigations</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-04-02/pdf/2018-06596.pdf
83 FR 7148 February 20, 2018	<i>Large Diameter Welded Pipe From India, the People's Republic of China, the Republic of Korea, and the Republic of Turkey: Initiation of Countervailing Duty Investigations</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-01-23/pdf/2018-01157.pdf
83 FR 27953 June 15, 2018	<i>Large Diameter Welded Pipe From Canada, Greece, India, the People's Republic of China, the Republic of Korea, and the Republic of Turkey: Postponement of Preliminary Determinations in the Less-Than-Fair-Value Investigations</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-06-15/pdf/2018-12899.pdf
83 FR 30693 June 29, 2018	<i>Large Diameter Welded Pipe From the Republic of Korea: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-06-29/pdf/2018-13566.pdf

Citation	Title	Link
83 FR 30690 June 29, 2018	<i>Large Diameter Welded Pipe From India: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-06-29/pdf/2018-13564.pdf
83 FR 30695 June 29, 2018	<i>Large Diameter Welded Pipe From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Determination</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-06-29/pdf/2018-13567.pdf
83 FR 30697 June 29, 2018	<i>Large Diameter Welded Pipe From the Republic of Turkey: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-06-29/pdf/2018-13565.pdf
83 FR 43651 August 27, 2018	<i>Large Diameter Welded Pipe From the Republic of Korea: Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-08-27/pdf/2018-18486.pdf
83 FR 43649 August 27, 2018	<i>Large Diameter Welded Pipe From Canada: Preliminary Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-08-27/pdf/2018-18488.pdf
83 FR 43646 August 27, 2018	<i>Large Diameter Welded Pipe From the Republic of Turkey: Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-08-27/pdf/2018-18490.pdf
83 FR 43640 August 27, 2018	<i>Large Diameter Welded Pipe From Greece: Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-08-27/pdf/2018-18487.pdf
83 FR 43653 August 27, 2018	<i>Large Diameter Welded Pipe From India: Preliminary Determination of Sales at Less Than Fair Value</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-08-27/pdf/2018-18485.pdf
83 FR 43644 August 27, 2018	<i>Large Diameter Welded Pipe From the People's Republic of China: Preliminary Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2018-08-27/pdf/2018-18489.pdf

Citation	Title	Link
83 FR 45279 September 6, 2018	<i>Large Diameter Welded Pipe From Canada, China, Greece, India, Korea, and Turkey; Scheduling of the Final Phase of Countervailing Duty and Antidumping Duty Investigations</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-09-06/pdf/2018-19280.pdf
83 FR 48795 September 27, 2018	<i>Large Diameter Welded Pipe From Greece: Amended Preliminary Determination of Sales at Less Than Fair Value</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-09-27/pdf/2018-20935.pdf
83 FR 56819 November 14, 2018	<i>Large Diameter Welded Pipe From India: Final Affirmative Countervailing Duty Determination</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-11-14/pdf/2018-24804.pdf
83 FR 56811 November 14, 2018	<i>Large Diameter Welded Pipe From India: Final Determination of Sales at Less Than Fair Value; 2017</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-11-14/pdf/2018-24806.pdf
83 FR 56816 November 14, 2018	<i>Large Diameter Welded Pipe From the People's Republic of China: Final Determination of Sales at Less Than Fair Value</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-11-14/pdf/2018-24807.pdf
83 FR 56804 November 14, 2018	<i>Countervailing Duty Investigation of Large Diameter Welded Pipe From the People's Republic of China: Final Affirmative Determination</i>	https://www.gpo.gov/fdsys/pkg/FR-2018-11-14/pdf/2018-24805.pdf

Citation	Title	Link
84 FR 6367 February 27, 2019	<i>Large Diameter Welded Pipe From the Republic of Turkey: Final Affirmative Countervailing Duty Determination</i>	https://www.govinfo.gov/content/pkg/FR-2019-02-27/pdf/2019-03344.pdf
84 FR 6367 February 27, 2019	<i>Issues and Decision Memorandum for the Final Determination in the Countervailing Duty Investigation of Large Diameter Welded Pipe from the Republic of Turkey</i>	https://enforcement.trade.gov/frn/2019/1902frn/index.html#TURKEY
84 FR 6369 February 27, 2019	<i>Large Diameter Welded Pipe From the Republic of Korea: Final Affirmative Countervailing Duty Determination</i>	https://www.govinfo.gov/content/pkg/FR-2019-02-27/pdf/2019-03318.pdf
84 FR 6367 February 27, 2019	<i>Large Diameter Welded Pipe from Korea: Issues and Decision Memorandum for the Final Affirmative Determination of the Countervailing Duty Investigation</i>	https://enforcement.trade.gov/frn/2019/1902frn/index.html#korea
84 FR 6378 February 27, 2019	<i>Large Diameter Welded Pipe From Canada: Final Affirmative Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2019-02-27/pdf/2019-03316.pdf
84 FR 6364 February 27, 2019	<i>Large Diameter Welded Pipe From Greece: Final Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2019-02-27/pdf/2019-03315.pdf
84 FR 6362 February 27, 2019	<i>Large Diameter Welded Pipe From the Republic of Turkey: Final Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2019-02-27/pdf/2019-03317.pdf
84 FR 6374 February 27, 2019	<i>Large Diameter Welded Pipe From the Republic of Korea: Final Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2019-02-27/pdf/2019-03319.pdf

APPENDIX B

LIST OF HEARING WITNESSES

CALENDAR OF PUBLIC HEARING

Those listed below appeared as witnesses at the United States International Trade Commission's hearing:

Subject: Large Diameter Welded Pipe from Canada, China, Greece, India, Korea, and Turkey

Inv. Nos.: 701-TA-593-596 and 731-TA-1401-1406 (Final)

Date and Time: November 6, 2018 - 9:30 a.m.

Sessions were held in connection with these investigations in the Main Hearing Room (Room 101), 500 E Street, SW., Washington, DC.

EMBASSY APPEARANCE:

**The Embassy of Greece
Washington, DC**

**Theodosios Vallas, Minister Plenipotentiary, Head of the Office for
Economic & Commercial Affairs**

OPENING REMARKS:

Petitioners (**Laura El-Sabaawi**, Wiley Rein LLP)
Respondents (**Deanna Tanner Okun**, Adduci, Mastriani & Schaumberg LLP)

In Support of the Imposition of Antidumping and Countervailing Duty Orders:

Wiley Rein LLP
Washington, DC
on behalf of

Petitioners

Jason Norris, President Dura-Bond Industries

John P. Stupp Jr., President and Chief Executive Officer,
Stupp Bros.; and Chief Executive Officer, Stupp Corporation

John Clark, Chief Commercial Officer, Stupp Corporation

Robert Griggs, President and Chief Executive Officer,
Trinity Product

**In Support to the Imposition of
Antidumping and Countervailing Duty Orders (continued):**

Michael Chefren, Chief Operations Officer, Skyline Steel

Ingo Riemer, President *and* Chief Executive Officer,
Berg Steel Pipe Corp.

Jonathan Kirkland, Vice President, Sales and Logistics,
Berg Steel Pipe Corp.

Jon Noland, Division Sales Manager, American
Cast Iron Pipe Company

Mike O'Brien, Vice President of Sales *and* Secretary,
American Cast Iron Pipe Company

Wesley Hendricks, Vice President of Commercial Pipe Sales,
JSW Steel (USA) Inc.

Burton Bluestone, President, Greens Bayou Pipe Mill, LP

Russell Fisher, Senior Vice President of Sales and Marketing,
Welspun Global Trade LLC

Robert Y. Kopf, General Manager, Business Support
United States Steel Corporation

Kris Coates, General Manager, Marketing and Business Information,
SSAB Americas

Dr. Seth Kaplan, Senior Economic Advisor, Capital Trade, Inc.

Andrew Szamosszegi, Principal, Capital Trade, Inc.

Timothy C. Brightbill)
Laura El-Sabaawi) – OF COUNSEL
Tessa V. Capeloto)

**In Opposition to the Imposition of
Antidumping and Countervailing Duty Orders:**

Vorys, Sater, Seymour, and Pease LLP
Washington, DC
on behalf of

Corinth Pipeworks Pipe Industry S.A.
CPW America Co. (collectively “CPW”)

Apostolos Papavasileiou, Chief Executive Officer, Corinth
Pipeworks Pipe Industry S.A.

Alexandra Tzanetopoulou, Legal Advisor, Corinth Pipeworks
Pipe Industry S.A.

Dianne Burger, President, CPW America Co.

Mark Soloninka, Vice President, CPW America Co.

Rebecca L. Woodings, Economic Consultant

Frederick P. Waite)
) – OF COUNSEL
Kimberly R. Young)

Cassidy Levy Kent (USA) LLP
Adduci, Mastriani & Schaumberg LLP
Hogan Lovells US LLP
Washington, DC
on behalf of

Evraz, Inc. NA (“Evraz”)
ICF Incorporated, L.L.C.

Conrad Winkler, President and Chief Executive Officer,
Evraz

Dave Coffin, Vice President Sales-Tubular, Evraz

Harry Vidas, Vice President, ICF Incorporated L.L.C.

James R. Cannon, Jr.)
Deanna Tanner Okun) – OF COUNSEL
Craig A. Lewis)

**In Opposition to the Imposition of
Antidumping and Countervailing Duty Orders (continued):**

Morris, Manning & Martin, LLP
Washington, DC
on behalf of

Borusan Mannesmann Boru Saayi ve Ticaret A.S.
Borusan Istikbal Ticaret T.A.S. (collectively “Borusan”)

Zafer Atabey, Chief Executive Officer, Borusan Mannesmann

Ugur Onbasi, Executive Vice President, Pipeline Projects,
Borusan Mannesmann

Todd Phillips, Vice President, Borusan Mannesmann Pipe

Emma K. Peterson, Trade Analyst, Morris, Manning & Martin, LLP

Julie C. Mendoza)
Donald B. Cameron) – OF COUNSEL
R. Will Planert)

Arent Fox LLP
Washington, DC
on behalf of

Turkish Producers and Exporters

Matthew M. Nolan) – OF COUNSEL

REBUTTAL/CLOSING REMARKS:

Petitioners (**Timothy C. Brightbill**, Wiley Rein LLP; and
Dr. Seth Kaplan, Capital Trade)

Respondents (**Frederick P. Waite**, Vorys, Sater, Seymour, and Pease LLP;
Julie C. Mendoza, Morris, Manning & Martin, LLP; and
James R. Cannon, Jr., Cassidy Levy Kent (USA) LLP)

-END-

APPENDIX C
SUMMARY DATA

Table C-2 ALT: Related party exclusion: split like product: LDW line pipe C-3
Table C-4 ALT: Related party exclusion: split like product: LDW stainless structural pipe C-5
Table C-5 ALT: "...": split like product: LDW carbon and other alloy steel structural pipe..... C-7
Table C-6: Split like product: LDW carbon and other alloy steel pipe C-9

Related party exclusion: Split like product: LDW line pipe

Table ALT C-2
LDW line pipe: Summary data concerning the U.S. market excluding one U.S. producer ***, 2015-17, January to June 2017, and January to June 2018
(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		January to June		Comparison years			Jan-Jun	
	2015	2016	2017	2017	2018	2015-17	2015-16	2016-17	2017-18
U.S. consumption quantity:									
Amount.....	2,870,827	1,999,775	2,025,788	913,317	889,026	(29.4)	(30.3)	1.3	(2.7)
Producers' share (fn1):									
Included producers.....	***	***	***	***	***	***	***	***	***
Excluded producers.....	***	***	***	***	***	***	***	***	***
All producers.....	55.1	66.3	52.4	51.2	55.5	(2.7)	11.2	(13.8)	4.2
Importers' share (fn1):									
Canada.....	11.3	2.9	8.0	7.9	10.9	(3.3)	(8.4)	5.1	3.0
China.....	1.2	0.6	0.7	1.1	0.4	(0.5)	(0.6)	0.1	(0.6)
Greece.....	7.0	4.5	0.7	0.2	11.4	(6.3)	(2.5)	(3.9)	11.2
India.....	1.8	1.6	19.3	21.9	0.2	17.6	(0.1)	17.7	(21.8)
Korea subject.....	***	***	***	***	***	***	***	***	***
Turkey subject.....	4.4	5.8	2.3	3.4	0.1	(2.1)	1.4	(3.6)	(3.3)
Subject sources.....	***	***	***	***	***	***	***	***	***
Subject sources less China and Greece.....	***	***	***	***	***	***	***	***	***
Korea nonsubject.....	***	***	***	***	***	***	***	***	***
Turkey nonsubject.....	0.0	0.0	---	---	---	(0.0)	(0.0)	(0.0)	---
All other sources.....	10.8	9.8	7.6	6.2	9.3	(3.2)	(1.0)	(2.2)	3.1
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
Nonsubject sources plus China and Greece.....	***	***	***	***	***	***	***	***	***
All import sources.....	44.9	33.7	47.6	48.8	44.5	2.7	(11.2)	13.8	(4.2)
U.S. consumption value:									
Amount.....	3,198,936	2,004,876	1,955,243	845,210	989,128	(38.9)	(37.3)	(2.5)	17.0
Producers' share (fn1):									
Included producers.....	***	***	***	***	***	***	***	***	***
Excluded producers.....	***	***	***	***	***	***	***	***	***
All producers.....	55.9	67.8	56.9	56.7	57.6	1.0	11.9	(10.9)	1.0
Importers' share (fn1):									
Canada.....	12.6	2.9	8.8	7.8	13.0	(3.9)	(9.7)	5.8	5.2
China.....	0.8	0.4	0.6	0.8	0.3	(0.2)	(0.4)	0.2	(0.4)
Greece.....	6.5	3.7	0.6	0.1	9.0	(5.9)	(2.8)	(3.1)	8.9
India.....	1.6	1.3	15.1	18.5	0.1	13.5	(0.3)	13.8	(18.4)
Korea subject.....	***	***	***	***	***	***	***	***	***
Turkey subject.....	4.8	6.4	2.3	3.7	0.2	(2.5)	1.5	(4.0)	(3.5)
Subject sources.....	***	***	***	***	***	***	***	***	***
Subject sources less China and Greece.....	***	***	***	***	***	***	***	***	***
Korea nonsubject.....	***	***	***	***	***	***	***	***	***
Turkey nonsubject.....	0.0	0.0	---	---	---	(0.0)	0.0	(0.0)	---
All other sources.....	11.2	9.3	7.5	5.8	9.2	(3.7)	(1.9)	(1.8)	3.3
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
Nonsubject sources plus China and Greece.....	***	***	***	***	***	***	***	***	***
All import sources.....	44.1	32.2	43.1	43.3	42.4	(1.0)	(11.9)	10.9	(1.0)
U.S. imports from:									
Canada:									
Quantity.....	324,081	57,112	161,169	71,846	96,783	(50.3)	(82.4)	182.2	34.7
Value.....	403,449	58,762	171,292	65,627	128,425	(57.5)	(85.4)	191.5	95.7
Unit value.....	\$1,245	\$1,029	\$1,063	\$913	\$1,327	(14.6)	(17.4)	3.3	45.3
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
China:									
Quantity.....	34,013	12,263	14,442	9,704	3,829	(57.5)	(63.9)	17.8	(60.5)
Value.....	25,977	7,595	11,940	6,658	3,424	(54.0)	(70.8)	57.2	(48.6)
Unit value.....	\$764	\$619	\$827	\$686	\$894	8.3	(18.9)	33.5	30.3
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Greece:									
Quantity.....	201,344	90,802	13,811	2,054	101,607	(93.1)	(54.9)	(84.8)	4,847.0
Value.....	208,570	74,072	11,377	559	88,769	(94.5)	(64.5)	(84.6)	15,780.4
Unit value.....	\$1,036	\$816	\$824	\$272	\$874	(20.5)	(21.3)	1.0	221.0
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
India:									
Quantity.....	51,072	32,693	391,976	200,292	1,492	667.5	(36.0)	1,099.0	(99.3)
Value.....	52,040	26,663	295,220	156,497	1,294	467.3	(48.8)	1,007.2	(99.2)
Unit value.....	\$1,019	\$816	\$753	\$781	\$868	(26.1)	(20.0)	(7.7)	11.0
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Korea subject:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Turkey subject:									
Quantity.....	125,951	116,311	45,720	31,201	874	(63.7)	(7.7)	(60.7)	(97.2)
Value.....	154,816	127,760	45,787	30,983	1,850	(70.4)	(17.5)	(64.2)	(94.0)
Unit value.....	\$1,229	\$1,098	\$1,001	\$993	\$2,117	(18.5)	(10.6)	(8.8)	113.2
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Subject sources:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Subject sources less China and Greece:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***

Table continued on next page.

Table ALT C-2--Continued

LDW line pipe: Summary data concerning the U.S. market excluding one U.S. producer ***, 2015-17, January to June 2017, and January to June 2018

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	2015	Calendar year 2016	2017	January to June 2017	January to June 2018	2015-17	Comparison years 2015-16	2016-17	Jan-Jun 2017-18
Korea nonsubject:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Turkey nonsubject:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
All other sources:									
Quantity.....	310,478	196,583	153,883	56,607	82,360	(50.4)	(36.7)	(21.7)	45.5
Value.....	358,566	186,232	146,169	49,217	90,557	(59.2)	(48.1)	(21.5)	84.0
Unit value.....	\$1,155	\$947	\$950	\$869	\$1,100	(17.8)	(18.0)	0.3	26.5
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Nonsubject sources:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Nonsubject sources plus China and Greece:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
All import sources:									
Quantity.....	1,289,161	674,705	963,758	445,334	395,753	(25.2)	(47.7)	42.8	(11.1)
Value.....	1,410,835	645,289	843,181	366,233	419,028	(40.2)	(54.3)	30.7	14.4
Unit value.....	\$1,094	\$956	\$875	\$822	\$1,059	(20.1)	(12.6)	(8.5)	28.8
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Included U.S. producers:									
Average capacity quantity.....	***	***	***	***	***	***	***	***	***
Production quantity.....	***	***	***	***	***	***	***	***	***
Capacity utilization (fn1).....	***	***	***	***	***	***	***	***	***
U.S. shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Channels of distribution (fn1):									
to Distributors.....	***	***	***	***	***	***	***	***	***
to Oil and gas end users.....	***	***	***	***	***	***	***	***	***
to Other end users.....	***	***	***	***	***	***	***	***	***
Export shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Inventories/total shipments (fn1).....	***	***	***	***	***	***	***	***	***
Production workers.....	***	***	***	***	***	***	***	***	***
Hours worked (1,000s).....	***	***	***	***	***	***	***	***	***
Wages paid (\$1,000).....	***	***	***	***	***	***	***	***	***
Hourly wages (dollars per hour).....	***	***	***	***	***	***	***	***	***
Productivity (short tons per 1,000 hours).....	***	***	***	***	***	***	***	***	***
Unit labor costs.....	***	***	***	***	***	***	***	***	***
Net sales:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Cost of goods sold (COGS).....	***	***	***	***	***	***	***	***	***
Gross profit or (loss).....	***	***	***	***	***	***	***	***	***
SG&A expenses.....	***	***	***	***	***	***	***	***	***
Operating income or (loss).....	***	***	***	***	***	***	***	***	***
Net income or (loss).....	***	***	***	***	***	***	***	***	***
Capital expenditures.....	***	***	***	***	***	***	***	***	***
Unit COGS.....	***	***	***	***	***	***	***	***	***
Unit SG&A expenses.....	***	***	***	***	***	***	***	***	***
Unit operating income or (loss).....	***	***	***	***	***	***	***	***	***
Unit net income or (loss).....	***	***	***	***	***	***	***	***	***
COGS/sales (fn1).....	***	***	***	***	***	***	***	***	***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***	***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***	***

Notes:

fn1.--Reported data are in percent and period changes are in percentage points. fn2.--Undefined.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics and *** records (to identify Korea subject vs nonsubject) using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed September 19, 2018

Related Party Exclusion: Split like product: LDW stainless steel structural

Table ALT C-4

LDW stainless steel structural pipe: Summary data concerning the U.S. market excluding one U.S. producer ***, 2015-17, January to June 2017, and January to June 2018
(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	2015	Calendar year 2016	2017	January to June 2017	2018	2015-17	Comparison years 2015-16	2016-17	Jan-Jun 2017-18
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	***	***	***	***
Producers' share (fn1):									
Included producers.....	***	***	***	***	***	***	***	***	***
Excluded producers.....	***	***	***	***	***	***	***	***	***
All producers.....	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
Canada.....	***	***	***	***	***	***	***	***	***
China.....	***	***	***	***	***	***	***	***	***
Greece.....	***	***	***	***	***	***	***	***	***
India.....	***	***	***	***	***	***	***	***	***
Korea.....	***	***	***	***	***	***	***	***	***
Turkey.....	***	***	***	***	***	***	***	***	***
Subject sources.....	***	***	***	***	***	***	***	***	***
Subject sources less Greece and Turkey.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
Nonsubject sources plus Greece and Turkey.....	***	***	***	***	***	***	***	***	***
All import sources.....	***	***	***	***	***	***	***	***	***
U.S. consumption value:									
Amount.....	***	***	***	***	***	***	***	***	***
Producers' share (fn1):									
Included producers.....	***	***	***	***	***	***	***	***	***
Excluded producers.....	***	***	***	***	***	***	***	***	***
All producers.....	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
Canada.....	***	***	***	***	***	***	***	***	***
China.....	***	***	***	***	***	***	***	***	***
Greece.....	***	***	***	***	***	***	***	***	***
India.....	***	***	***	***	***	***	***	***	***
Korea.....	***	***	***	***	***	***	***	***	***
Turkey.....	***	***	***	***	***	***	***	***	***
Subject sources.....	***	***	***	***	***	***	***	***	***
Subject sources less Greece and Turkey.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
Nonsubject sources plus Greece and Turkey.....	***	***	***	***	***	***	***	***	***
All import sources.....	***	***	***	***	***	***	***	***	***
U.S. imports from:									
Canada:									
Quantity.....	98	128	58	10	44	(41.0)	30.1	(54.7)	338.7
Value.....	756	810	458	86	387	(39.4)	7.1	(43.4)	349.4
Unit value.....	\$7,695	\$6,330	\$7,904	\$8,662	\$8,874	2.7	(17.7)	24.9	2.4
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
China:									
Quantity.....	---	70	401	369	177	fn2	fn2	477.1	(51.9)
Value.....	---	253	2,335	2,013	1,137	fn2	fn2	823.6	(43.5)
Unit value.....	---	\$3,636	\$5,820	\$5,461	\$6,415	fn2	fn2	60.0	17.5
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Greece:									
Quantity.....	---	---	---	---	---	fn2	fn2	fn2	fn2
Value.....	---	---	---	---	---	fn2	fn2	fn2	fn2
Unit value.....	---	---	---	---	---	fn2	fn2	fn2	fn2
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
India:									
Quantity.....	7	---	39	---	246	442.0	(100.0)	fn2	fn2
Value.....	36	---	107	---	793	200.6	(100.0)	fn2	fn2
Unit value.....	\$4,930	---	\$2,734	---	\$3,225	(44.5)	(100.0)	fn2	fn2
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Korea:									
Quantity.....	435	2,978	30	---	1	(93.1)	585.2	(99.0)	fn2
Value.....	4,075	17,680	107	---	7	(97.4)	333.8	(99.4)	fn2
Unit value.....	\$9,378	\$5,938	\$3,591	---	\$4,603	(61.7)	(36.7)	(39.5)	fn2
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Turkey:									
Quantity.....	67	2	---	---	---	(100.0)	(97.6)	(100.0)	fn2
Value.....	944	10	---	---	---	(100.0)	(98.9)	(100.0)	fn2
Unit value.....	\$14,152	\$6,459	---	---	---	(100.0)	(54.4)	(100.0)	fn2
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Subject sources:									
Quantity.....	607	3,177	528	379	468	(13.0)	423.5	(83.4)	23.6
Value.....	5,812	18,753	3,007	2,099	2,324	(48.3)	222.7	(84.0)	10.7
Unit value.....	\$9,578	\$5,903	\$5,694	\$5,545	\$4,964	(40.6)	(38.4)	(3.6)	(10.5)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Subject sources less Greece and Turkey:									
Quantity.....	540	3,175	528	379	468	(2.2)	487.9	(83.4)	23.6
Value.....	4,867	18,743	3,007	2,099	2,324	(38.2)	285.1	(84.0)	10.7
Unit value.....	\$9,012	\$5,903	\$5,694	\$5,545	\$4,964	(36.8)	(34.5)	(3.5)	(10.5)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Nonsubject sources:									
Quantity.....	120	1,111	148	37	952	24.0	829.5	(86.7)	2,483.3
Value.....	1,131	3,973	912	327	5,220	(19.3)	251.3	(77.0)	1,498.7
Unit value.....	\$9,458	\$3,574	\$6,151	\$8,857	\$5,481	(35.0)	(62.2)	72.1	(38.1)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***

Table continued on next page.

Table ALT C-4--Continued

LDW stainless steel structural pipe: Summary data concerning the U.S. market excluding one U.S. producer ***, 2015-17, January to June 2017, and January to June 2018
(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	2015	Calendar year 2016	2017	January to June 2017	January to June 2018	2015-17	Comparison years 2015-16	2016-17	Jan-Jun 2017-18
Nonsubject sources plus Greece and Turkey:									
Quantity.....	186	1,113	148	37	952	(20.4)	497.5	(86.7)	2,483.3
Value.....	2,075	3,983	912	327	5,220	(56.0)	91.9	(77.1)	1,498.7
Unit value.....	\$11,139	\$3,578	\$6,151	\$8,857	\$5,481	(44.8)	(67.9)	71.9	(38.1)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
All import sources:									
Quantity.....	726	4,288	677	415	1,420	(6.9)	490.4	(84.2)	241.9
Value.....	6,943	22,726	3,920	2,426	7,544	(43.5)	227.3	(82.8)	211.0
Unit value.....	\$9,558	\$5,300	\$5,794	\$5,839	\$5,311	(39.4)	(44.6)	9.3	(9.0)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Included U.S. producers:									
Average capacity quantity.....	***	***	***	***	***	***	***	***	***
Production quantity.....	***	***	***	***	***	***	***	***	***
Capacity utilization (fn1).....	***	***	***	***	***	***	***	***	***
U.S. shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Channels of distribution (fn1):									
to Distributors.....	***	***	***	***	***	***	***	***	***
to Oil and gas end users.....	***	***	***	***	***	***	***	***	***
to Other end users.....	***	***	***	***	***	***	***	***	***
Export shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Inventories/total shipments (fn1).....	***	***	***	***	***	***	***	***	***
Production workers.....	***	***	***	***	***	***	***	***	***
Hours worked (1,000s).....	***	***	***	***	***	***	***	***	***
Wages paid (\$1,000).....	***	***	***	***	***	***	***	***	***
Hourly wages (dollars per hour).....	***	***	***	***	***	***	***	***	***
Productivity (short tons per 1,000 hours).....	***	***	***	***	***	***	***	***	***
Unit labor costs.....	***	***	***	***	***	***	***	***	***
Net sales:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Cost of goods sold (COGS).....	***	***	***	***	***	***	***	***	***
Gross profit or (loss).....	***	***	***	***	***	***	***	***	***
SG&A expenses.....	***	***	***	***	***	***	***	***	***
Operating income or (loss).....	***	***	***	***	***	***	***	***	***
Net income or (loss).....	***	***	***	***	***	***	***	***	***
Capital expenditures.....	***	***	***	***	***	***	***	***	***
Unit COGS.....	***	***	***	***	***	***	***	***	***
Unit SG&A expenses.....	***	***	***	***	***	***	***	***	***
Unit operating income or (loss).....	***	***	***	***	***	***	***	***	***
Unit net income or (loss).....	***	***	***	***	***	***	***	***	***
COGS/sales (fn1).....	***	***	***	***	***	***	***	***	***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***	***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***	***

Notes:

fn1.--Reported data are in percent and period changes are in percentage points. fn2.--Undefined.
fn3.--Not gathered.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using HTS statistical reporting number 7305.31.6010, accessed September 19, 2018.

Related Party Exclusion: Split like product: LDW carbon and other alloy steel structural pipe

Table ALT C-5

LDW carbon and other alloy steel structural pipe: Summary data concerning the U.S. market excluding one U.S. producer ***, 2015-17, January to June 2017, and January to June 2018
(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		January to June			Comparison years			Jan-Jun
	2015	2016	2017	2017	2018	2015-17	2015-16	2016-17	2017-18
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	***	***	***	***
Producers' share (fn1):									
Included producers.....	***	***	***	***	***	***	***	***	***
Excluded producers.....	***	***	***	***	***	***	***	***	***
All producers.....	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
Canada.....	***	***	***	***	***	***	***	***	***
China.....	***	***	***	***	***	***	***	***	***
Greece.....	***	***	***	***	***	***	***	***	***
India.....	***	***	***	***	***	***	***	***	***
Korea.....	***	***	***	***	***	***	***	***	***
Turkey.....	***	***	***	***	***	***	***	***	***
Subject sources.....	***	***	***	***	***	***	***	***	***
Subject sources less Greece and India.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
Nonsubject sources plus Greece and India.....	***	***	***	***	***	***	***	***	***
All import sources.....	***	***	***	***	***	***	***	***	***
U.S. consumption value:									
Amount.....	***	***	***	***	***	***	***	***	***
Producers' share (fn1):									
Included producers.....	***	***	***	***	***	***	***	***	***
Excluded producers.....	***	***	***	***	***	***	***	***	***
All producers.....	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
Canada.....	***	***	***	***	***	***	***	***	***
China.....	***	***	***	***	***	***	***	***	***
Greece.....	***	***	***	***	***	***	***	***	***
India.....	***	***	***	***	***	***	***	***	***
Korea.....	***	***	***	***	***	***	***	***	***
Turkey.....	***	***	***	***	***	***	***	***	***
Subject sources.....	***	***	***	***	***	***	***	***	***
Subject sources less Greece and India.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
Nonsubject sources plus Greece and India.....	***	***	***	***	***	***	***	***	***
All import sources.....	***	***	***	***	***	***	***	***	***
U.S. imports from:									
Canada:									
Quantity.....	13,987	10,426	12,980	6,807	3,428	(7.2)	(25.5)	24.5	(49.6)
Value.....	9,651	6,495	9,234	4,396	2,405	(4.3)	(32.7)	42.2	(45.3)
Unit value.....	\$690	\$623	\$711	\$646	\$702	3.1	(9.7)	14.2	8.6
Ending inventory quantity.....	---	---	---	---	---	fn2	fn2	fn2	fn2
China:									
Quantity.....	18,288	8,659	20,496	10,261	5,960	12.1	(52.7)	136.7	(41.9)
Value.....	14,517	6,272	17,507	8,405	8,311	20.6	(56.8)	179.1	(1.1)
Unit value.....	\$794	\$724	\$854	\$819	\$1,394	7.6	(8.8)	17.9	70.2
Ending inventory quantity.....	8,484	3,428	1,120	1,120	320	(86.8)	(59.6)	(67.3)	(71.4)
Greece:									
Quantity.....	---	---	44	44	---	fn2	fn2	fn2	(100.0)
Value.....	---	---	42	42	---	fn2	fn2	fn2	(100.0)
Unit value.....	---	---	\$974	\$974	---	fn2	fn2	fn2	(100.0)
Ending inventory quantity.....	---	---	---	---	---	fn2	fn2	fn2	fn2
India:									
Quantity.....	12	26	120	---	149	923.4	122.3	360.3	fn2
Value.....	19	26	95	---	120	414.0	39.2	269.3	fn2
Unit value.....	\$1,578	\$988	\$793	---	\$802	(49.8)	(37.4)	(19.8)	fn2
Ending inventory quantity.....	---	---	---	---	---	fn2	fn2	fn2	fn2
Korea:									
Quantity.....	8,803	20,463	20,993	9,198	13,518	138.5	132.5	2.6	47.0
Value.....	6,883	16,244	15,846	6,397	12,538	130.2	136.0	(2.4)	96.0
Unit value.....	\$782	\$794	\$755	\$695	\$927	(3.5)	1.5	(4.9)	33.4
Ending inventory quantity.....	---	---	---	---	---	fn2	fn2	fn2	fn2
Turkey:									
Quantity.....	1,216	3,257	16,770	5,752	4,111	1,279.7	168.0	414.8	(28.5)
Value.....	1,425	3,031	15,447	5,565	3,674	984.1	112.7	409.6	(34.0)
Unit value.....	\$1,172	\$931	\$921	\$968	\$894	(21.4)	(20.6)	(1.0)	(7.6)
Ending inventory quantity.....	---	---	---	---	---	fn2	fn2	fn2	fn2
Subject sources:									
Quantity.....	42,305	42,832	71,403	32,061	27,166	68.8	1.2	66.7	(15.3)
Value.....	32,495	32,068	58,172	24,805	27,047	79.0	(1.3)	81.4	9.0
Unit value.....	\$768	\$749	\$815	\$774	\$996	6.1	(2.5)	8.8	28.7
Ending inventory quantity.....	8,484	3,428	1,120	1,120	320	(86.8)	(59.6)	(67.3)	(71.4)
Subject sources less Greece and India:									
Quantity.....	42,293	42,806	71,239	32,018	27,017	68.4	1.2	66.4	(15.6)
Value.....	32,476	32,042	58,035	24,763	26,928	78.7	(1.3)	81.1	8.7
Unit value.....	\$768	\$749	\$815	\$773	\$997	6.1	(2.5)	8.8	28.9
Ending inventory quantity.....	8,484	3,428	1,120	1,120	320	(86.8)	(59.6)	(67.3)	(71.4)
Nonsubject sources:									
Quantity.....	18,130	27,054	26,433	9,471	12,134	45.8	49.2	(2.3)	28.1
Value.....	20,190	24,348	23,041	7,353	15,650	14.1	20.6	(5.4)	112.8
Unit value.....	\$1,114	\$900	\$872	\$776	\$1,290	(21.7)	(19.2)	(3.1)	66.1
Ending inventory quantity.....	18	7	7	7	7	(61.1)	(61.1)	---	---

Table continued on next page.

Table ALT C-5--Continued

LDW carbon and other alloy steel structural pipe: Summary data concerning the U.S. market excluding one U.S. producer ***, 2015-17, January to June 2017, and January to June 2018
(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	2015	Calendar year 2016	2017	January to June 2017	January to June 2018	2015-17	Comparison years 2015-16	2016-17	Jan-Jun 2017-18
Nonsubject sources plus Greece and India:									
Quantity.....	18,142	27,080	26,597	9,514	12,283	46.6	49.3	(1.8)	29.1
Value.....	20,209	24,374	23,179	7,395	15,770	14.7	20.6	(4.9)	113.2
Unit value.....	\$1,114	\$900	\$871	\$777	\$1,284	(21.8)	(19.2)	(3.2)	65.2
Ending inventory quantity.....	18	7	7	7	7	(61.1)	(61.1)	---	---
All import sources:									
Quantity.....	60,435	69,886	97,836	41,532	39,299	61.9	15.6	40.0	(5.4)
Value.....	52,685	56,416	81,213	32,158	42,697	54.1	7.1	44.0	32.8
Unit value.....	\$872	\$807	\$830	\$774	\$1,086	(4.8)	(7.4)	2.8	40.3
Ending inventory quantity.....	8,502	3,435	1,127	1,127	327	(86.7)	(59.6)	(67.2)	(71.0)
Included U.S. producers:									
Average capacity quantity.....	***	***	***	***	***	***	***	***	***
Production quantity.....	***	***	***	***	***	***	***	***	***
Capacity utilization (fn1).....	***	***	***	***	***	***	***	***	***
U.S. shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Channels of distribution (fn1):									
to Distributors.....	***	***	***	***	***	***	***	***	***
to Oil and gas end users.....	***	***	***	***	***	***	***	***	***
to Other end users.....	***	***	***	***	***	***	***	***	***
Export shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Inventories/total shipments (fn1).....	***	***	***	***	***	***	***	***	***
Production workers.....	***	***	***	***	***	***	***	***	***
Hours worked (1,000s).....	***	***	***	***	***	***	***	***	***
Wages paid (\$1,000).....	***	***	***	***	***	***	***	***	***
Hourly wages (dollars per hour).....	***	***	***	***	***	***	***	***	***
Productivity (short tons per 1,000 hours).....	***	***	***	***	***	***	***	***	***
Unit labor costs.....	***	***	***	***	***	***	***	***	***
Net sales:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Cost of goods sold (COGS).....	***	***	***	***	***	***	***	***	***
Gross profit or (loss).....	***	***	***	***	***	***	***	***	***
SG&A expenses.....	***	***	***	***	***	***	***	***	***
Operating income or (loss).....	***	***	***	***	***	***	***	***	***
Net income or (loss).....	***	***	***	***	***	***	***	***	***
Capital expenditures.....	***	***	***	***	***	***	***	***	***
Unit COGS.....	***	***	***	***	***	***	***	***	***
Unit SG&A expenses.....	***	***	***	***	***	***	***	***	***
Unit operating income or (loss).....	***	***	***	***	***	***	***	***	***
Unit net income or (loss).....	***	***	***	***	***	***	***	***	***
COGS/sales (fn1).....	***	***	***	***	***	***	***	***	***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***	***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***	***

Notes:

fn1.--Reported data are in percent and period changes are in percentage points.
fn2.--Undefined.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using HTS statistical reporting numbers 7305.31.4000, 7305.31.6090, 7305.39.1000, and 7305.39.5000, accessed September 19, 2018.

Split like product: LDW carbon and other alloy steel pipe

Table C-6

LDW carbon and other alloy steel pipe: Summary data concerning the U.S. market, 2015-17, January to June 2017, and January to June 2018

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		January to June			Comparison years			Jan-Jun
	2015	2016	2017	2017	2018	2015-17	2015-16	2016-17	2017-18
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	***	***	***	***
Producers' share (fn1).....	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
Canada.....	***	***	***	***	***	***	***	***	***
China.....	***	***	***	***	***	***	***	***	***
Greece.....	***	***	***	***	***	***	***	***	***
India.....	***	***	***	***	***	***	***	***	***
Korea.....	***	***	***	***	***	***	***	***	***
Turkey.....	***	***	***	***	***	***	***	***	***
Subject sources.....	***	***	***	***	***	***	***	***	***
Subject sources less Greece.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
Nonsubject sources plus Greece.....	***	***	***	***	***	***	***	***	***
All import sources.....	***	***	***	***	***	***	***	***	***
U.S. consumption value:									
Amount.....	***	***	***	***	***	***	***	***	***
Producers' share (fn1).....	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
Canada.....	***	***	***	***	***	***	***	***	***
China.....	***	***	***	***	***	***	***	***	***
Greece.....	***	***	***	***	***	***	***	***	***
India.....	***	***	***	***	***	***	***	***	***
Korea.....	***	***	***	***	***	***	***	***	***
Turkey.....	***	***	***	***	***	***	***	***	***
Subject sources.....	***	***	***	***	***	***	***	***	***
Subject sources less Greece.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
Nonsubject sources plus Greece.....	***	***	***	***	***	***	***	***	***
All import sources.....	***	***	***	***	***	***	***	***	***
U.S. imports from:									
Canada:									
Quantity.....	338,068	67,538	174,149	78,654	100,211	(48.5)	(80.0)	157.9	27.4
Value.....	413,100	65,257	180,526	70,023	130,830	(56.3)	(84.2)	176.6	86.8
Unit value.....	\$1,222	\$966	\$1,037	\$890	\$1,306	(15.2)	(20.9)	7.3	46.6
Ending inventory quantity.....	---	---	34,604	18,876	---	fn2	fn2	fn2	(100.0)
China:									
Quantity.....	52,301	20,922	34,938	19,965	9,789	(33.2)	(60.0)	67.0	(51.0)
Value.....	40,494	13,866	29,447	15,064	11,735	(27.3)	(65.8)	112.4	(22.1)
Unit value.....	\$774	\$663	\$843	\$755	\$1,199	8.9	(14.4)	27.2	58.9
Ending inventory quantity.....	11,439	4,912	1,576	1,939	620	(86.2)	(57.1)	(67.9)	(68.0)
Greece:									
Quantity.....	201,344	90,802	13,854	2,097	101,607	(93.1)	(54.9)	(84.7)	4,744.3
Value.....	208,570	74,072	11,420	601	88,769	(94.5)	(64.5)	(84.6)	14,661.0
Unit value.....	\$1,036	\$816	\$824	\$287	\$874	(20.4)	(21.3)	1.0	204.7
Ending inventory quantity.....	1,320	1,320	246	550	---	(81.4)	---	(81.4)	(100.0)
India:									
Quantity.....	51,083	32,719	392,096	200,292	1,641	667.6	(35.9)	1,098.4	(99.2)
Value.....	52,059	26,689	295,315	156,497	1,414	467.3	(48.7)	1,006.5	(99.1)
Unit value.....	\$1,019	\$816	\$753	\$781	\$862	(26.1)	(20.0)	(7.7)	10.3
Ending inventory quantity.....	364	364	655	232	438	79.9	---	79.9	88.8
Korea:									
Quantity.....	149,012	129,472	161,636	64,692	98,813	8.5	(13.1)	24.8	52.7
Value.....	130,900	114,508	134,237	46,557	87,249	2.5	(12.5)	17.2	27.2
Unit value.....	\$878	\$884	\$830	\$720	\$883	(5.5)	0.7	(6.1)	22.7
Ending inventory quantity.....	2,724	5,502	2,567	3,638	4,106	(5.8)	102.0	(53.3)	12.9
Turkey subject:									
Quantity.....	127,166	119,568	62,490	36,953	4,985	(50.9)	(6.0)	(47.7)	(86.5)
Value.....	155,681	130,439	61,235	36,547	5,523	(60.7)	(16.2)	(53.1)	(84.9)
Unit value.....	\$1,224	\$1,091	\$980	\$989	\$1,108	(20.0)	(10.9)	(10.2)	12.0
Ending inventory quantity.....	---	---	---	---	---	fn2	fn2	fn2	fn2
Subject sources:									
Quantity.....	918,975	461,022	839,164	402,653	317,045	(8.7)	(49.8)	82.0	(21.3)
Value.....	1,000,803	424,832	712,180	325,289	325,521	(28.8)	(57.6)	67.6	0.1
Unit value.....	\$1,089	\$922	\$849	\$808	\$1,027	(22.1)	(15.4)	(7.9)	27.1
Ending inventory quantity.....	15,847	12,098	39,648	25,235	5,164	150.2	(23.7)	227.7	(79.5)
Subject sources less Greece:									
Quantity.....	717,631	370,219	825,310	400,556	215,439	15.0	(48.4)	122.9	(46.2)
Value.....	792,233	350,760	700,760	324,687	236,752	(11.5)	(55.7)	99.8	(27.1)
Unit value.....	\$1,104	\$947	\$849	\$811	\$1,099	(23.1)	(14.2)	(10.4)	35.6
Ending inventory quantity.....	14,527	10,778	39,402	24,685	5,164	171.2	(25.8)	265.6	(79.1)
Nonsubject sources:									
Quantity.....	430,621	283,569	222,429	84,213	118,007	(48.3)	(34.1)	(21.6)	40.1
Value.....	451,198	242,596	196,261	66,705	123,660	(56.5)	(46.2)	(19.1)	85.4
Unit value.....	\$1,048	\$856	\$882	\$792	\$1,048	(15.8)	(18.4)	3.1	32.3
Ending inventory quantity.....	75,734	38,546	30,247	23,536	10,235	(60.1)	(49.1)	(21.5)	(56.5)
Nonsubject sources plus Greece:									
Quantity.....	631,965	374,371	236,284	86,311	219,614	(62.6)	(40.8)	(36.9)	154.4
Value.....	659,768	316,668	207,681	67,307	212,429	(68.5)	(52.0)	(34.4)	215.6
Unit value.....	\$1,044	\$846	\$879	\$780	\$967	(15.8)	(19.0)	3.9	24.0
Ending inventory quantity.....	77,054	39,866	30,493	24,086	10,235	(60.4)	(48.3)	(23.5)	(57.5)
All import sources:									
Quantity.....	1,349,596	744,591	1,061,594	486,866	435,052	(21.3)	(44.8)	42.6	(10.6)
Value.....	1,452,001	667,428	908,441	391,994	449,181	(37.4)	(54.0)	36.1	14.6
Unit value.....	\$1,076	\$896	\$856	\$805	\$1,032	(20.5)	(16.7)	(4.5)	28.2
Ending inventory quantity.....	91,581	50,644	69,895	48,771	15,399	(23.7)	(44.7)	38.0	(68.4)

Table continued on next page.

Table C-6--Continued

LDW carbon and other alloy steel pipe: Summary data concerning the U.S. market, 2015-17, January to June 2017, and January to June 2018

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year			January to June		Comparison years			Jan-Jun
	2015	2016	2017	2017	2018	2015-17	2015-16	2016-17	2017-18
U.S. producers:									
Average capacity quantity.....	***	***	***	***	***	***	***	***	***
Production quantity.....	***	***	***	***	***	***	***	***	***
Capacity utilization (fn1).....	***	***	***	***	***	***	***	***	***
U.S. shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Channels of distribution (fn1):									
to Distributors.....	***	***	***	***	***	***	***	***	***
to Oil and gas end users.....	***	***	***	***	***	***	***	***	***
to Other end users.....	***	***	***	***	***	***	***	***	***
Export shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Inventories/total shipments (fn1).....	***	***	***	***	***	***	***	***	***
Production workers.....	***	***	***	***	***	***	***	***	***
Hours worked (1,000s).....	***	***	***	***	***	***	***	***	***
Wages paid (\$1,000).....	***	***	***	***	***	***	***	***	***
Hourly wages (dollars per hour).....	***	***	***	***	***	***	***	***	***
Productivity (short tons per 1,000 hours).....	***	***	***	***	***	***	***	***	***
Unit labor costs.....	***	***	***	***	***	***	***	***	***
Net sales:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Cost of goods sold (COGS).....	***	***	***	***	***	***	***	***	***
Gross profit or (loss).....	***	***	***	***	***	***	***	***	***
SG&A expenses.....	***	***	***	***	***	***	***	***	***
Operating income or (loss).....	***	***	***	***	***	***	***	***	***
Net income or (loss).....	***	***	***	***	***	***	***	***	***
Capital expenditures.....	***	***	***	***	***	***	***	***	***
Unit COGS.....	***	***	***	***	***	***	***	***	***
Unit SG&A expenses.....	***	***	***	***	***	***	***	***	***
Unit operating income or (loss).....	***	***	***	***	***	***	***	***	***
Unit net income or (loss).....	***	***	***	***	***	***	***	***	***
COGS/sales (fn1).....	***	***	***	***	***	***	***	***	***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***	***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***	***

Notes:

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--Undefined.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics and *** records (to identify Korea subject vs nonsubject) using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, 7305.19.5000, 7305.31.4000, 7305.31.6090, 7305.39.1000, and 7305.39.5000, accessed September 19, 2018.

APPENDIX D

Negligibility

In appendix D, supplemental tables D-1, D-2, D-5, D-7, D-9, and D-10 present data on negligibility reflecting Commerce's final CVD determination with respect to Turkey. Each of these tables present data on the basis of quantity.¹

¹ Staff notes that in *Large Diameter Welded Pipe from Canada, China, Greece, India, Korea, and Turkey: Investigation Nos. 701-TA-593-596 and 731-TA-1401-1406 (Final)*, memorandum INV-QQ-0137, data presented in tables D-7 and D-9 inadvertently reflected value-based calculations.

**Table D-1--Supplemental
LDW line pipe: U.S. imports in the twelve month period preceding the filing of the petition,
January through December 2017**

Item	January 2017 through December 2017			
	AD investigations		CVD investigations	
	Quantity (short tons)	Share of quantity (percent)	Quantity (short tons)	Share of quantity (percent)
U.S. imports from.-- Canada	161,169	18.7	NA	NA
China	14,442	1.7	14,442	1.5
Greece	13,811	1.6	NA	NA
India	391,976	45.4	391,976	40.7
Korea subject	83,134	9.6	***	***
Turkey subject	45,720	5.3	***	***
Subject sources	710,251	82.2	***	***
Korea nonsubject	---	---	***	***
Turkey nonsubject	---	---	***	***
All other sources	153,883	17.8	328,863	34.1
Nonsubject sources	153,883	17.8	***	***
All import sources	864,135	100.0	963,758	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Official U.S. import statistics and *** using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000, accessed September 19, 2018.

Table D-2

LDW line pipe: Twelve months of U.S. imports from China, Greece, Turkey CVD, and from all sources, by ending month, 2016-18

12 month period ending in	U.S. imports from China (short tons)	U.S. imports from Greece (short tons)	U.S. imports from Turkey subject to CVD (short tons)	U.S. imports from all import sources AD denominator (short tons)	U.S. imports from all import sources CVD denominator (short tons)	China AD share (percent)	China CVD share (percent)	Greece share (percent)	Turkey CVD share (percent)
2016.--									
January	32,785	187,210	***	1,050,522	***	3.1	***	17.8	***
February	36,047	191,744	***	1,039,263	***	3.5	***	18.5	***
March	26,999	174,264	***	940,511	***	2.9	***	18.5	***
April	25,225	171,354	***	936,103	***	2.7	***	18.3	***
May	22,419	143,584	***	844,363	***	2.7	***	17.0	***
June	22,308	112,615	***	770,676	***	2.9	***	14.6	***
July	20,384	68,226	***	676,311	***	3.0	***	10.1	***
August	13,185	51,173	***	625,772	***	2.1	***	8.2	***
September	13,061	38,563	***	579,140	***	2.3	***	6.7	***
October	12,902	51,236	***	552,932	***	2.3	***	9.3	***
November	12,238	64,185	***	571,325	***	2.1	***	11.2	***
December	12,263	90,802	***	580,032	***	2.1	***	15.7	***
2017.--									
January	14,954	84,734	***	541,039	***	2.8	***	15.7	***
February	13,438	80,200	***	568,905	***	2.4	***	14.1	***
March	13,107	79,836	***	636,751	***	2.1	***	12.5	***
April	13,145	64,519	***	597,306	***	2.2	***	10.8	***
May	14,448	64,519	***	655,241	***	2.2	***	9.8	***
June	14,234	57,745	***	663,648	***	2.1	***	8.7	***
July	12,791	54,293	***	690,356	***	1.9	***	7.9	***
August	12,694	54,293	***	728,280	***	1.7	***	7.5	***
September	13,780	54,293	***	821,761	***	1.7	***	6.6	***
October	13,126	41,621	***	874,282	***	1.5	***	4.8	***
November	13,451	40,426	***	881,900	***	1.5	***	4.6	***
December (negligibility period)	14,442	13,811	***	864,135	***	1.7	***	1.6	***
2018.--									
January	11,979	26,248	***	875,908	***	1.4	***	3.0	***
February	11,254	39,500	***	851,681	***	1.3	***	4.6	***
March	10,995	57,998	***	806,642	***	1.4	***	7.2	***
April	9,689	81,554	***	834,414	***	1.2	***	9.8	***
May	8,315	113,363	***	809,263	***	1.0	***	14.0	***
June	8,567	113,363	***	781,386	***	1.1	***	14.5	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Official U.S. import statistics and proprietary Customs records using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, and 7305.19.5000.

Table D-5

LDW stainless steel structural pipe: U.S. imports in the twelve month period preceding the filing of the petition, January 2017 through December 2017

Item	January 2017 through December 2017			
	AD investigations		CVD investigations	
	Quantity (short tons)	Share of quantity (percent)	Quantity (short tons)	Share of quantity (percent)
U.S. imports from.-- Canada	58	8.6	NA	NA
China	401	59.3	401	59.3
Greece	---	---	NA	NA
India	39	5.8	39	5.8
Korea subject	30	4.4	30	4.4
Turkey subject	---	---	---	---
Subject sources	528	78.1	470	69.5
Turkey nonsubject	---	---	---	---
Korea nonsubject	---	---	---	---
All other sources	148	21.9	206	30.5
Nonsubject sources	148	21.9	206	30.5
All import sources	677	100.0	677	100.0

Source: Official U.S. import statistics using HTS statistical reporting number 7305.31.6010, accessed September 19, 2018.

Table D-7--Supplemental
LDW carbon and other alloy steel structural pipe: U.S. imports in the twelve month period
preceding the filing of the petition, January to December 2017

Item	January 2017 through December 2017			
	AD investigations		CVD investigations	
	Quantity (short tons)	Share of quantity (percent)	Quantity (short tons)	Share of quantity (percent)
U.S. imports from.-- Canada	12,980	13.3	NA	NA
China	20,496	20.9	20,496	20.9
Greece	44	0.0	NA	NA
India	120	0.1	120	0.1
Korea subject	20,993	21.5	20,993	21.5
Turkey subject	16,770	17.1	16,770	17.1
Subject sources	71,403	73.0	58,379	59.7
Korea nonsubject	---	---	---	---
Turkey nonsubject	---	---	---	---
All other sources	26,433	27.0	39,457	40.3
Nonsubject sources	26,433	27.0	39,457	40.3
All import sources	97,836	100.0	97,836	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Official U.S. import statistics using HTS statistical reporting numbers 7305.31.4000, 7305.31.6090, 7305.39.1000, and 7305.39.5000, accessed September 19, 2018.

Table D-9--Supplemental

LDW carbon and other alloys steel pipe: U.S. imports in the twelve month period preceding the filing of the petition, January 2017 through December 2017

Item	January 2017 through December 2017			
	AD investigations		CVD investigations	
	Quantity (short tons)	Share of quantity (percent)	Quantity (short tons)	Share of quantity (percent)
U.S. imports from.-- Canada	174,149	18.1	NA	NA
China	34,938	3.6	34,938	3.3
Greece	13,854	1.4	NA	NA
India	392,096	40.8	392,096	36.9
Korea subject	***	***	***	***
Turkey subject	62,490	6.5	***	***
Subject sources	***	***	***	***
Korea nonsubject	***	***	***	***
Turkey nonsubject	***	***	***	***
All other sources	180,316	18.7	368,320	34.7
Nonsubject sources	***	***	***	***
All import sources	961,971	100.0	1,061,594	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Official U.S. import statistics and *** records (to identify Korea subject vs nonsubject) using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, 7305.19.5000, 7305.31.4000, 7305.31.6090, 7305.39.1000, and 7305.39.5000, accessed September 19, 2018.

Table D-10

LDW carbon and other alloy steel pipe: Twelve months of U.S. imports from Greece, Turkey CVD, and from all sources, by ending month, 2016-18

12 month period ending in	U.S. imports from Greece (short tons)	U.S. imports from Turkey CVD (short tons)	U.S. imports from all import sources (short tons)	Greece share (percent)	Turkey CVD share (percent)
2016.--					
January	187,210	***	1,260,778	14.8	***
February	191,744	***	1,249,551	15.3	***
March	174,264	***	1,157,191	15.1	***
April	171,354	***	1,154,130	14.8	***
May	143,584	***	1,061,558	13.5	***
June	112,615	***	965,571	11.7	***
July	68,226	***	861,064	7.9	***
August	51,173	***	805,878	6.3	***
September	38,563	***	754,470	5.1	***
October	51,236	***	723,196	7.1	***
November	64,185	***	734,598	8.7	***
December	90,802	***	744,591	12.2	***
2017.--					
January	84,734	***	704,822	12.0	***
February	80,243	***	732,352	11.0	***
March	79,879	***	784,616	10.2	***
April	64,562	***	735,969	8.8	***
May	64,562	***	797,228	8.1	***
June	57,788	***	811,379	7.1	***
July	54,337	***	853,159	6.4	***
August	54,337	***	893,534	6.1	***
September	54,337	***	1,008,942	5.4	***
October	41,664	***	1,059,559	3.9	***
November	40,469	***	1,068,720	3.8	***
December (negligibility period)	13,854	***	1,061,594	1.3	***
2018.--					
January	26,291	***	1,082,952	2.4	***
February	39,500	***	1,053,865	3.7	***
March	57,998	***	1,014,934	5.7	***
April	81,554	***	1,043,899	7.8	***
May	113,363	***	1,021,978	11.1	***
June	113,363	***	1,009,780	11.2	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Official U.S. import statistics and proprietary Customs records (to identify Korea subject vs nonsubject) using HTS statistical reporting numbers 7305.11.1030, 7305.11.1060, 7305.11.5000, 7305.12.1030, 7305.12.1060, 7305.12.5000, 7305.19.1030, 7305.19.1060, 7305.19.5000, 7305.31.4000, 7305.31.6090, 7305.39.1000, and 7305.39.5000

