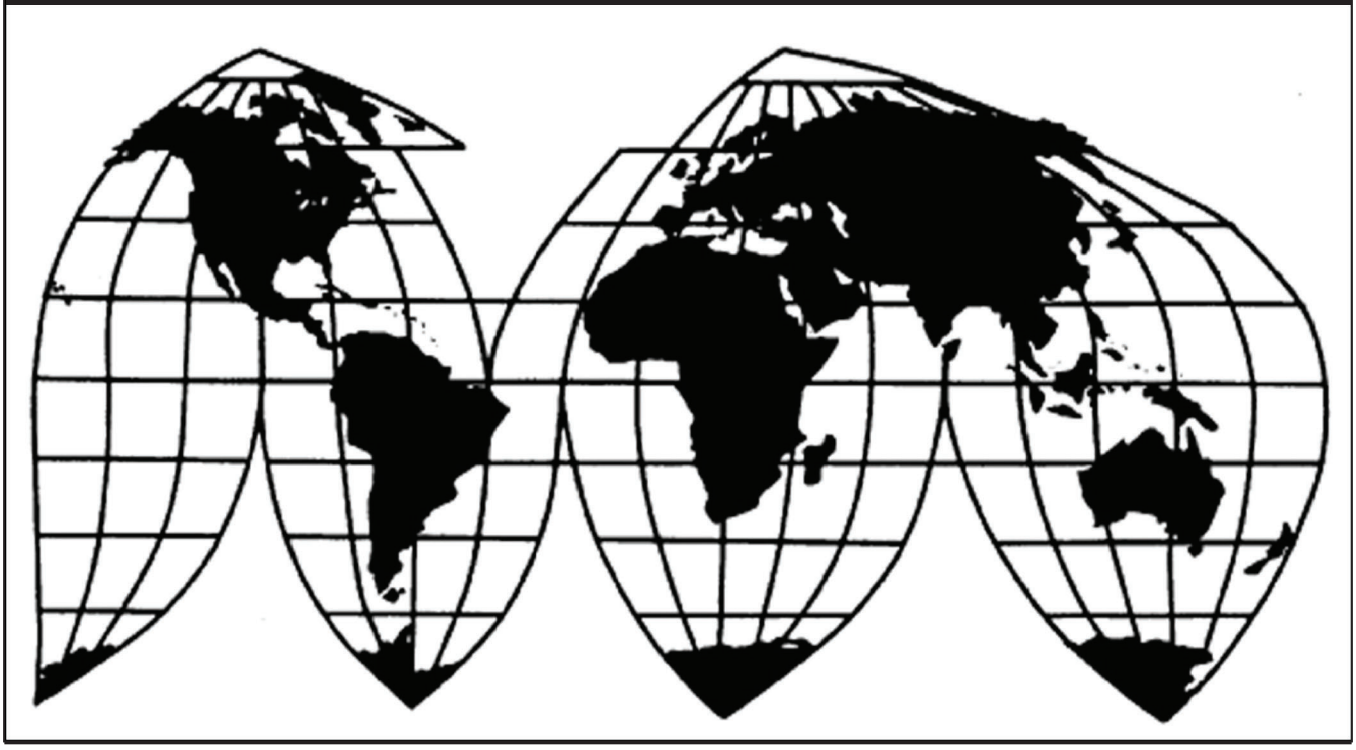
Seamless Refined Copper Pipe and Tube from Vietnam

Investigation No. 731-TA-1528 (Final)

Publication 5216 **August 2021**

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

COMMISSIONERS

Jason E. Kearns, Chair
Randolph J. Stayin, Vice Chair
David S. Johanson
Rhonda K. Schmidtlein
Amy A. Karpel

Catherine DeFilippo
Director of Operations

Staff assigned

Jordan Harriman, Investigator
Mark Brininstool, Industry Analyst
John Benedetto, Economist
Kamron Daugherty, Economist
Emily Kim, Accountant
Ann Marie Carton, Statistician
Henry Smith, Attorney
Douglas Corkran, Supervisory Investigator

Special thanks to

Patrick Gallagher, Attorney

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

Seamless Refined Copper Pipe and Tube from Vietnam

Investigation No. 731-TA-1528 (Final)

Publication 5216

August 2021

CONTENTS

Page

CONTENTS

Page

CONTENTS

Page

CONTENTS

Note.—Information that would reveal confidential operations of individual concerns may not be published.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

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation No. 731-TA-1528 (Final)

Seamless Refined Copper Pipe and Tube from Vietnam

DETERMINATION

On the basis of the record[1] developed in the subject investigation, the United States International Trade Commission ("Commission") determines, pursuant to the Tariff Act of 1930 ("the Act"), that an industry in the United States is materially injured by reason of imports of seamless refined copper pipe and tube ("SRC pipe and tube") from Vietnam, provided for in subheading 7411.10.10 of the Harmonized Tariff Schedule of the United States, 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").[2]

BACKGROUND

The Commission instituted this investigation effective June 30, 2020, following receipt of a petition filed with the Commission and Commerce by the American Copper Tube Coalition, consisting of the Mueller Group, Collierville, Tennessee, and Cerro Flow Products, LLC, Sauget, Illinois. The Commission scheduled the final phase of the investigation following notification of a preliminary determination by Commerce that imports of SRC pipe and tube from Vietnam were being sold at LTFV within the meaning of section 733(b) of the Act (19 U.S.C. 1673b(b)). Notice of the scheduling of the final phase of the Commission's investigation 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* of February 23, 2021 (86 FR 10994). Since no party to the investigation requested a hearing, the public hearing in connection with the investigation, originally scheduled for June 15, 2021, was canceled.[3]

---

[1] The record is defined in § 207.2(f) of the Commission's Rules of Practice and Procedure (19 CFR 207.2(f)).

[2] 86 FR 33228 (June 24, 2021).

[3] 86 FR 32277 (June 11, 2021).

Views of the Commission

Based on the record in the final phase of this investigation, we determine that an industry in the United States is materially injured by reason of imports of seamless refined copper pipe and tube ("SRC pipe and tube") from Vietnam found by the U.S. Department of Commerce ("Commerce") to be sold in the United States at less than fair value.

I. Background

The American Copper Tube Coalition ("Petitioner" or "Coalition"), a coalition of domestic producers of SRC pipe and tube, filed the petition in this investigation on June 30, 2020.[1] The Coalition submitted a prehearing brief, written responses to Commission questions, and final comments.[2] No respondent entities participated in this investigation.

U.S. industry data for the January 1, 2018, to December 31, 2020, period of investigation ("POI") are based on the questionnaire responses of six domestic producers that are believed to account for the vast majority of U.S. production of SRC pipe and tube in 2020.[3] U.S. import data and related information are based on official Commerce import statistics under HTS statistical reporting numbers 7411.10.1030 and 7411.10.1090 and on the questionnaire responses of 23 U.S. importers of SRC pipe and tube, which accounted for 67.8 percent of subject imports from Vietnam and 78.3 percent of imports of SRC pipe and tube from other sources in 2020 based on those HTS statistical reporting numbers.[4] Foreign industry data are based on the questionnaire responses of two firms: Toan Phat Copper Joint Stock Company ("Toan Phat"), a Vietnamese producer of SRC pipe and tube, and Summit Tech Ltd. ("Summit Tech"), an exporter of SRC pipe

[1] The members of the American Copper Tube Coalition are the Mueller Group ("Mueller") (consisting of Mueller Copper Tube Products, Inc., Mueller Copper Tube West Co., Mueller Copper Tube Company, Inc., Howell Metal Co., and Linesets, Inc.) and Cerro Flow Products, LLC ("Cerro").

[2] On June 1, 2021, counsel for Petitioner and domestic interested party GD Copper USA Inc. ("GD Copper") requested that the Commission consider cancellation of the hearing for this investigation if no other party requested to appear at the hearing before June 8, 2021, which was the deadline for requests to appear. On June 8, 2021, counsel for Petitioner requested that the hearing be cancelled and clarified on June 10, 2021 that its request to participate in the hearing was withdrawn. Counsel indicated a willingness to submit written responses to any Commission questions in lieu of a hearing. Because no party to the investigation requested to participate in a hearing, the Commission cancelled the public hearing in connection with this investigation scheduled for June 15, 2021 and, instead, issued written questions to the parties. *See Seamless Refined Copper Pipe and Tube from Vietnam; Cancellation of Hearing for a Final Phase Antidumping Duty Investigation*, 86 Fed. Reg. 32277 (June 17, 2021).

[3] Confidential Report, Memorandum INV-TT-083 (July 7, 2021), as revised by Memorandum INV-TT-085 (July 13, 2021) ("CR") and Public Report ("PR"), *Seamless Refined Copper Pipe and Tube from Vietnam,* Inv. No. 731-TA-1528 (Final), USITC Pub. 5216 (Aug. 2021) at I-4, III-1. The six firms providing usable U.S. producer questionnaire responses are the two petitioning firms, Mueller and Cerro, and four other U.S. producers: Cambridge-Lee Industries LLC ("Cambridge"), GD Copper, H&H Tube ("H&H"), and Wieland Holdings, Inc. ("Wieland"). Precision Tube Co., another subsidiary of Mueller, was included in Mueller's response. *Id.* at III-1 n.2.

[4] CR/PR at I-4, IV-1.

and tube from Vietnam.[5] Toan Phat estimates that it accounted for *** percent of production of SRC pipe and tube in Vietnam in 2020.[6]

II. Domestic Like Product

A. In General

In determining whether an industry in the United States is materially injured or threatened with material injury by reason of imports of subject merchandise, the Commission first defines the "domestic like product" and the "industry."[7] Section 771(4)(A) of the Tariff Act of 1930, as amended ("the Tariff Act"), defines the relevant domestic industry as the "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."[8] In turn, the Tariff Act defines "domestic like product" as "a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation."[9]

By statute, the Commission's "domestic like product" analysis begins with the "article subject to an investigation," *i.e.*, the subject merchandise as determined by Commerce.[10] Therefore, Commerce's determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value is "necessarily the starting point of the Commission's like product analysis."[11] The Commission then defines the domestic like product in light of the imported articles Commerce has identified.[12] The decision regarding the appropriate domestic like product(s) in an investigation is a factual determination, and the Commission has applied the statutory standard of "like" or "most similar in characteristics and

[5] CR/PR at I-4, VII-3. Summit Tech reported exportation of SRC pipe and tube ***. *Id.* at VII-3.

[6] CR/PR at I-4, VII-3.

[7] 19 U.S.C. § 1677(4)(A).

[8] 19 U.S.C. § 1677(4)(A).

[9] 19 U.S.C. § 1677(10).

[10] 19 U.S.C. § 1677(10). The Commission must accept Commerce's determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value. *See*, *e.g.*, *USEC, Inc. v. United States*, 34 Fed. App'x 725, 730 (Fed. Cir. 2002) ("The ITC may not modify the class or kind of imported merchandise examined by Commerce."); *Algoma Steel Corp. v. United States,* 688 F. Supp. 639, 644 (Ct. Int'l Trade 1988), *aff'd*, 865 F.3d 240 (Fed. Cir.), *cert. denied*, 492 U.S. 919 (1989).

[11] *Cleo Inc. v. United States*, 501 F.3d 1291, 1298 (Fed. Cir. 2007); *see also Hitachi Metals, Ltd. v. United States*, 949 F.3d 710, 717 (Fed. Cir. 2020) (the statute requires the Commission to start with Commerce's subject merchandise in reaching its own like product determination).

[12] *Cleo*, 501 F.3d at 1298 n.1 ("Commerce's {scope} finding does not control the Commission's {like product} determination."); *Hosiden Corp. v. Advanced Display Mfrs.,* 85 F.3d 1561, 1568 (Fed. Cir. 1996) (the Commission may find a single like product corresponding to several different classes or kinds defined by Commerce); *Torrington Co. v. United States*, 747 F. Supp. 744, 748–52 (Ct. Int'l Trade 1990), *aff'd*, 938 F.2d 1278 (Fed. Cir. 1991) (affirming the Commission's determination defining six like products in investigations where Commerce found five classes or kinds).

uses" on a case-by-case basis.[13] No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.[14] The Commission looks for clear dividing lines among possible like products and disregards minor variations.[15]

B. Product Description

Commerce defined the scope of the imported merchandise under investigation as follows:

> … all seamless circular refined copper pipes and tubes, including redraw hollows, greater than or equal to 6 inches (152.4 mm) in actual length and measuring less than 12.130 inches (308.102 mm) in actual outside diameter (OD), regardless of wall thickness, bore (*e.g.,* smooth, enhanced with inner grooves or ridges), manufacturing process (*e.g.,* hot finished, cold-drawn, annealed), outer surface (*e.g.,* plain or enhanced with grooves, ridges, fins, or gills), end finish (*e.g.,* plain end, swaged end, flared end, expanded end, crimped end, threaded), coating (*e.g.,* plastic, paint), insulation, attachments (*e.g.,* plain, capped, plugged, with compression or other fitting), or physical configuration (*e.g.,* straight, coiled, bent, wound on spools).
>
> The scope of this investigation covers, but is not limited to, seamless refined copper pipe and tube produced or comparable to the American Society for Testing and Materials (ASTM) ASTM–B42, ASTM–B68, ASTM–B75, ASTM–B88, ASTM–B88M, ASTM–B188, ASTM–B251, ASTM–B251M, ASTM–B280, ASTM–B302, ASTM–B306, ASTM–B359, ASTM–B743, ASTM–B819, and ASTM–B903 specifications and meeting the physical parameters described therein.
>
> Also included within the scope of this investigation are all sets of covered products, including ''line sets'' of seamless refined copper tubes (with or without

---

[13] *See*, *e.g.*, *Cleo*, 501 F.3d at 1299; *NEC Corp. v. Dep't of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int'l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Torrington*, 747 F. Supp. at 749 n.3 ("every like product determination 'must be made on the particular record at issue' and the 'unique facts of each case'"). The Commission generally considers a number of factors, including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. *See Nippon*, 19 CIT at 455 n.4; *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int'l Trade 1996).

[14] *See*, *e.g.*, S. Rep. No. 96-249 at 90-91 (1979).

[15] *Nippon*, 19 CIT at 455; *Torrington*, 747 F. Supp. at 748-49; *see also* S. Rep. No. 96-249 at 90-91 (Congress has indicated that the like product standard should not be interpreted in "such a narrow fashion as to permit minor differences in physical characteristics or uses to lead to the conclusion that the product and article are not 'like' each other, nor should the definition of 'like product' be interpreted in such a fashion as to prevent consideration of an industry adversely affected by the imports under consideration.").

fittings or insulation) suitable for connecting an outdoor air conditioner or heat pump to an indoor evaporator unit. The phrase ''all sets of covered products'' denotes any combination of items put up for sale that is comprised of merchandise subject to the scope.

''Refined copper'' is defined as: (1) Metal containing at least 99.85 percent by actual weight of copper; or (2) metal containing at least 97.5 percent by actual weight of copper, provided that the content by actual weight of any other element does not exceed the following limits:

Element	**Limiting content percent by weight**
Ag—Silver	0.25
As—Arsenic	0.5
Cd—Cadmium	1.3
Cr—Chromium	1.4
Mg—Magnesium	0.8
Pb—Lead	1.5
S—Sulfur	0.7
Sn—Tin	0.8
Te—Tellurium	0.8
Zn—Zinc	1.0
Zr—Zirconium	0.3
Other elements (each)	0.3

Excluded from the scope of this investigation are all seamless circular hollows of refined copper less than 12 inches in actual length whose actual OD exceeds its actual length.

The products subject to this investigation are currently classifiable under subheadings 7411.10.1030 and 7411.10.1090 of the Harmonized Tariff Schedule of the United States (HTSUS). Products subject to the investigation may also enter under HTSUS subheadings 7407.10.1500, 7419.99.5050, 8415.90.8065, and 8415.90.8085. Although the HTSUS subheadings are provided for convenience and Customs purposes, the written description of the scope of the investigation is dispositive.[16]

[16] *Seamless Refined Copper Pipe and Tube from the Socialist Republic of Vietnam: Final Affirmative Determination of Sales-at-Less-Than-Fair-Value and Final Negative Determination of Critical Circumstances*, 86 Fed. Reg. 33228, 33230-31 (June 24, 2021) ("Commerce Final Determination"). The scope has not changed since the Commission's preliminary determination. *Id.* at 33229.

SRC pipe and tube are fabricated products of refined copper with a circular cross section of varying nominal outside diameter sizes and wall thicknesses. The tubing surfaces are either smooth, internally enhanced with grooves or ridges, or externally enhanced with fins or gills. SRC pipe and tube are available in straight lengths, bent to shape, coiled flat without spools, or coiled onto spools. The variety of physical dimensions and characteristics available for SRC pipe and tube reflects the range of end-use applications that take advantage of copper's strength, malleability, ductility, thermal conductivity, corrosion resistance, and chemical purity.

"Plumbing" SRC pipe and tube is commonly produced to various ASTM International (formerly, the American Society for Testing and Materials) ("ASTM") standards that specify the chemical composition, outside diameter, wall thickness, strength, hardness, cleanliness, roundness, marking, and other requirements for SRC pipe and tube based on end-use applications. Plumbing SRC pipe and tube is commonly used in distribution systems for water and other liquids and gases.[17] "Commercial" (also referred to as "industrial") SRC pipe and tube is produced to either industry standard specifications or customer nonstandard specifications, including any surface enhancements designed to improve thermal transfer capabilities. Common applications for commercial SRC pipe and tube include refrigeration and heating units; split-system central, room and window, central, and vehicle air conditioners; and chillers and freezers.[18]

C. Domestic Like Product Analysis

We define a single domestic like product consisting of all SRC pipe and tube, coextensive with Commerce's scope.

In our preliminary determination, we considered whether to define a single domestic like product encompassing plumbing and commercial SRC pipe and tube.[19] We found that all SRC pipe and tube share the same basic physical characteristics and uses and are generally interchangeable. Moreover, we found that there is some overlap in channels of distribution between plumbing and commercial SRC pipe and tube, and that they share the same production facilities, production processes, and production employees. We found that, generally, the record of the preliminary phase investigation indicated that customers perceive SRC pipe and tube as a single product category with a broad mix of variations across a continuum of products, and that there are not large price differences between plumbing and commercial SRC pipe and tube with similar characteristics despite differing pricing structures. Accordingly, we defined a single domestic like product consisting of all SRC pipe and tube, coextensive with the scope of the investigation.[20]

In the final phase of the investigation, Petitioner requests that the Commission continue to define a single domestic like product, coextensive with the scope of this investigation, as it

[17] *See* CR/PR at I-8, II-1.

[18] *See* CR/PR at I-9, II-1.

[19] *Seamless Refined Copper Pipe and Tube from Vietnam*, Inv. No. 731-TA-1528 (Preliminary), USITC Pub. 5108 (Aug. 2020) at 7-9 ("Preliminary Determination").

[20] Preliminary Determination, USITC Pub. 5108 at 9.

did in the preliminary phase of this investigation.[21] No respondent entity disputes the definition of the domestic like product from the preliminary determination.

The record in the final phase of this investigation contains no new information suggesting the characteristics or uses of SRC pipe and tube are different from that in our preliminary determination.[22] Therefore, for the same reasons set forth in our preliminary determination, we define a single domestic like product consisting of all SRC pipe and tube, coextensive with the scope of the investigation.

III. Domestic Industry

The domestic industry is defined as the domestic "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."[23] In defining the domestic industry, the Commission's general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

This investigation raises the issue of whether *** engaged in sufficient production-related activities to qualify as a domestic producer of the domestic like product.

A. Sufficient Production-Related Activities Analysis

In deciding whether a firm qualifies as a domestic producer of the domestic like product, the Commission generally analyzes the overall nature of a firm's U.S. production-related activities, although production-related activity at minimum levels could be insufficient to constitute domestic production.[24] We find that *** engaged in sufficient production-related activities to qualify as a domestic producer of SRC pipe and tube. Petitioner argues that the Commission should define the domestic industry to include all domestic producers of SRC pipe and tube without explicitly addressing whether *** qualifies as a domestic producer,[25] and no respondent entity has indicated any disagreement with this domestic industry definition.

---

[21] *See* Petitioner's Prehearing Brief at 5-9.

[22] *See generally* CR/PR at I-8 to I-17.

[23] 19 U.S.C. § 1677(4)(A).

[24] The Commission generally considers six factors: (1) source and extent of the firm's capital investment; (2) technical expertise involved in U.S. production activities; (3) value added to the product in the United States; (4) employment levels; (5) quantity and type of parts sourced in the United States; and (6) any other costs and activities in the United States directly leading to production of the like product. No single factor is determinative and the Commission may consider any other factors it deems relevant in light of the specific facts of any investigation. *Crystalline Silicon Photovoltaic Cells and Modules from China*, Inv. Nos. 701-TA-481 and 731-TA-1190 (Final), USITC Pub. 4360 at 12-13 (Nov. 2012) *aff'd, Changzhou Trina Solar Energy Co., Ltd. v. U.S. Int'l Trade Comm'n*, 879 F.3d 1377 (Fed. Cir. 2018).

[25] *See* Petitioner's Prehearing Brief at 10.

Source and Extent of Firm's Capital Investment. *** capital expenditures and net assets were substantial for a producer of its small size, though generally lower than that of the other domestic producers.[26]

Technical Expertise. Although ***.[27]

Value Added. The value added by *** activities was substantial, ranging from a low of *** percent to a high of *** percent during the POI.[28]

Employment Levels. *** employment levels were lower than those of other domestic producers, but commensurate with its small size.[29]

Quantity and Type of Parts Sourced in United States. *** sourced roughly *** of the SRC pipe and tube for its *** activities domestically, while importing the balance of its requirements.[30]

Conclusion. In light of the above, particularly the degree of technical expertise and substantial value added by ***, and in the absence of any party argument to the contrary, we find that *** engaged in sufficient production-related activities to qualify as a domestic producer. Therefore, consistent with our definition of a single domestic like product, we define the domestic industry as consisting of all domestic producers of SRC pipe and tube.[31]

---

[26] *See* CR/PR at Table III-1 (*** accounted for *** percent of domestic production in 2020), Table VI-7 (***), and Table VI-11.

[27] *See* CR/PR at VI-14 n.7.

[28] *See* CR/PR at VI-15 n.11.

[29] *Compare* *** U.S. Producer Questionnaire Response at II-9a *with* CR/PR at Table III-14.

[30] *See* CR/PR at Table III-11.

[31] There are no related party issues due to importation or affiliation, as no domestic producer imported subject merchandise during the POI or is related to an importer or exporter of subject merchandise. *See* CR/PR at III-3, III-11. U.S. producers *** reported purchases from importers of SRC pipe and tube from Vietnam during the POI. *See id.* at III-11. A domestic producer that does not itself import subject merchandise or does not share a corporate affiliation with an importer may nonetheless be deemed a related party if it indirectly controls an exporter or importer of subject merchandise. 19 U.S.C. § 1677(4)(B). The Commission has found such control to exist, for example, when the domestic producer's purchases were responsible for a predominant proportion of an importer's subject imports and the importer's subject imports were substantial. *See, e.g.*, *Certain Seamless Carbon and Alloy Steel Standard, Line, and Pressure Pipe from Argentina, Brazil, Germany, and Italy*, Inv. Nos. 701-TA-362 and 731-TA-707-710 (Review), USITC Pub. 3429 at 8-9 (June 2001).

*** reported purchases of imported SRC pipe and tube from Vietnam totaling *** pounds in 2019 and *** pounds in 2020. CR/PR at III-11. Notably, *** identified *** as the source of its purchases of imported SRC pipe and tube from Vietnam. *Id.* at n.8. The Commission did not receive an importers' questionnaire response from *** but did receive one from its related firm, ***, which informed Commission staff that the imports from Vietnam it reported in its importers' questionnaire were imported by *** with itself as consignee. *Id.* *** reported purchases of imported SRC pipe and tube from Vietnam in 2020 were equivalent to *** percent of the 2020 subject import data reported by *** (though this does not include other imports by *** which would not have been reported by ***). *Id.* Furthermore, *** did not identify *** as one of its top ten largest customers in its U.S. importers' questionnaire response. *Id.* We find that *** purchases were insufficient for it to qualify as a related party.

(Continued...)

IV. Material Injury by Reason of Subject Imports[32]

Based on the record in the final phase of this investigation, we find that an industry in the United States is materially injured by reason of imports of SRC pipe and tube from Vietnam that Commerce has found to be sold in the United States at less than fair value.

A. Legal Standards

In the final phase of antidumping and countervailing duty investigations, the Commission determines whether an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.[33] In making this determination, the Commission must consider the volume of subject imports, their effect on prices for the domestic like product, and their impact on domestic producers of the domestic like product, but only in the context of U.S. production operations.[34] The statute defines "material injury" as "harm which is not inconsequential, immaterial, or unimportant."[35] In assessing whether the domestic industry is materially injured by reason of subject imports, we consider all relevant economic factors that bear on the state of the industry in the United States.[36] No single factor is dispositive, and all relevant factors are considered "within the

*** reported purchases of imported SRC pipe and tube from Vietnam totaling *** pounds in 2019 and *** pounds in 2020. CR/PR at III-11. *** identified *** as the source of its purchases of imported SRC pipe and tube from Vietnam. *Id.* at n.8. *** purchases appear to account for all of *** reported imports from Vietnam in 2020. *Id*. However *** accounted for only *** percent of subject imports in 2020 and is primarily an importer of nonsubject SRC pipe and tube (*** percent of its total imports of SRC pipe and tube reported in 2020 were from nonsubject sources). *Id.* While *** was responsible for a predominant portion of *** subject imports of SRC pipe and tube in 2020, *** subject imports were not substantial. *See* *** U.S. Importer Questionnaire Response at II-5a. Therefore, we find that *** purchases were insufficient for it to qualify as a related party.

[32] Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product that account for less than 3 percent 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 shall be deemed negligible. 19 U.S.C. §§ 1671b(a), 1673b(a), 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)). The exceptions to this general rule are not applicable here.

Based on official Commerce import statistics under HTS statistical reporting numbers 7411.10.1030 and 7411.10.1090, subject imports from Vietnam accounted for 37.3 percent of total U.S. imports of SRC pipe and tube by quantity in the 12-month period (June 2019 to May 2020) preceding the filing of the petition. CR/PR at Table IV-5. Thus, we find that subject imports from Vietnam are not negligible.

[33] 19 U.S.C. §§ 1671d(b), 1673d(b).

[34] 19 U.S.C. § 1677(7)(B). The Commission "may consider such other economic factors as are relevant to the determination" but shall "identify each {such} factor ... and explain in full its relevance to the determination." 19 U.S.C. § 1677(7)(B).

[35] 19 U.S.C. § 1677(7)(A).

[36] 19 U.S.C. § 1677(7)(C)(iii).

context of the business cycle and conditions of competition that are distinctive to the affected industry."[37]

Although the statute requires the Commission to determine whether the domestic industry is "materially injured or threatened with material injury by reason of" unfairly traded imports,[38] it does not define the phrase "by reason of," indicating that this aspect of the injury analysis is left to the Commission's reasonable exercise of its discretion.[39] In identifying a causal link, if any, between subject imports and material injury to the domestic industry, the Commission examines the facts of record that relate to the significance of the volume and price effects of the subject imports and any impact of those imports on the condition of the domestic industry. This evaluation under the "by reason of" standard must ensure that subject imports are more than a minimal or tangential cause of injury and that there is a sufficient causal, not merely a temporal, nexus between subject imports and material injury.[40]

In many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry. Such economic factors might include nonsubject imports; changes in technology, demand, or consumer tastes; competition among domestic producers; or management decisions by domestic producers. The legislative history explains that the Commission must examine factors other than subject imports to ensure that it is not attributing injury from other factors to the subject imports, thereby inflating an otherwise tangential cause of injury into one that satisfies the statutory material injury threshold.[41] In performing its examination, however, the Commission need not isolate

---

[37] 19 U.S.C. § 1677(7)(C)(iii).

[38] 19 U.S.C. §§ 1671d(b), 1673d(b).

[39] *Angus Chemical Co. v. United States*, 140 F.3d 1478, 1484-85 (Fed. Cir. 1998) ("{T}he statute does not 'compel the commissioners' to employ {a particular methodology}."), *aff'g,* 944 F. Supp. 943, 951 (Ct. Int'l Trade 1996).

[40] The Federal Circuit, in addressing the causation standard of the statute, observed that "{a}s long as its effects are not merely incidental, tangential, or trivial, the foreign product sold at less than fair value meets the causation requirement." *Nippon Steel Corp. v. U.S. Int'l Trade Comm'n*, 345 F.3d 1379, 1384 (Fed. Cir. 2003). This was further ratified in *Mittal Steel Point Lisas Ltd. v. United States*, 542 F.3d 867, 873 (Fed. Cir. 2008), where the Federal Circuit, quoting *Gerald Metals, Inc. v. United States*, 132 F.3d 716, 722 (Fed. Cir. 1997), stated that "this court requires evidence in the record 'to show that the harm occurred "by reason of" the LTFV imports, not by reason of a minimal or tangential contribution to material harm caused by LTFV goods.'" *See also Nippon Steel Corp. v. United States*, 458 F.3d 1345, 1357 (Fed. Cir. 2006); *Taiwan Semiconductor Industry Ass'n v. U.S. Int'l Trade Comm'n*, 266 F.3d 1339, 1345 (Fed. Cir. 2001).

[41] Uruguay Round Agreements Act Statement of Administrative Action ("SAA"), H.R. Rep. 103-316, vol. I. at 851-52 ("{T}he Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports."); S. Rep. 96-249 at 75 (1979) (the Commission "will consider information which indicates that harm is caused by factors other than less-than-fair-value imports."); H.R. Rep. 96-317 at 47 (1979) ("in examining the overall injury being experienced by a domestic industry, the ITC will take into account evidence presented to it which demonstrates that the harm attributed by the petitioner to the subsidized or dumped imports is attributable to such other factors;" those factors include "the volume and prices of nonsubsidized imports or imports sold at fair value, contraction in demand or changes in patterns of consumption, trade restrictive practices of and (Continued...)

the injury caused by other factors from injury caused by unfairly traded imports.[42] Nor does the "by reason of" standard require that unfairly traded imports be the "principal" cause of injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry.[43] It is clear that the existence of injury caused by other factors does not compel a negative determination.[44]

Assessment of whether material injury to the domestic industry is "by reason of" subject imports "does not require the Commission to address the causation issue in any particular way" as long as "the injury to the domestic industry can reasonably be attributed to the subject imports."[45] The Commission ensures that it has "evidence in the record" to "show that the harm occurred 'by reason of' the LTFV imports," and that it is "not attributing injury from other

---

competition between the foreign and domestic producers, developments in technology and the export performance and productivity of the domestic industry"); *accord Mittal Steel*, 542 F.3d at 877.

[42] SAA at 851-52 ("{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports."); *Taiwan Semiconductor Industry Ass'n,* 266 F.3d at 1345 ("{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports ... . Rather, the Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports." (emphasis in original)); *Asociacion de Productores de Salmon y Trucha de Chile AG v. United States*, 180 F. Supp. 2d 1360, 1375 (Ct. Int'l Trade 2002) ("{t}he Commission is not required to isolate the effects of subject imports from other factors contributing to injury" or make "bright-line distinctions" between the effects of subject imports and other causes.); *see also Softwood Lumber from Canada*, Inv. Nos. 701-TA-414 and 731-TA-928 (Remand), USITC Pub. 3658 at 100-01 (Dec. 2003) (Commission recognized that "{i}f an alleged other factor is found not to have or threaten to have injurious effects to the domestic industry, *i.e*., it is not an 'other causal factor,' then there is nothing to further examine regarding attribution to injury"), *citing Gerald Metals,* 132 F.3d at 722 (the statute "does not suggest that an importer of LTFV goods can escape countervailing duties by finding some tangential or minor cause unrelated to the LTFV goods that contributed to the harmful effects on domestic market prices.").

[43] S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

[44] *See Nippon Steel Corp*., 345 F.3d at 1381 ("an affirmative material-injury determination under the statute requires no more than a substantial-factor showing. That is, the 'dumping' need not be the sole or principal cause of injury.").

[45] *Mittal Steel*, 542 F.3d at 878; *see also id.* at 873 ("While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured 'by reason of' subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology."), *citing United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75. In its decision in *Swiff-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission's causation analysis as comporting with the Court's guidance in *Mittal*.

sources to the subject imports."[46] The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed "rigid adherence to a specific formula."[47]

The question of whether the material injury threshold for subject imports is satisfied notwithstanding any injury from other factors is factual, subject to review under the substantial evidence standard.[48] Congress has delegated this factual finding to the Commission because of the agency's institutional expertise in resolving injury issues.[49]

B. Conditions of Competition and the Business Cycle

The following conditions of competition inform our analysis of whether there is material injury by reason of subject imports.

1. Demand Considerations

U.S. demand for SRC pipe and tube depends on demand for U.S.-produced downstream products and end uses, including HVAC units, plumbing, refrigeration, and other industrial applications;[50] it is also driven by activity in the construction sector. Construction spending is, in turn, driven by activity in the construction sector as well as construction costs.[51] Construction spending increased irregularly during the POI, increasing 12.1 percent overall from January 2018 to March 2021.[52]

Market participants reported varying trends in U.S. demand for SRC pipe and tube since January 1, 2018. Most responding U.S. producers reported that demand had decreased or fluctuated, most importers reported that demand had decreased, and most U.S. purchasers

---

[46] *Mittal Steel*, 542 F.3d at 873 (quoting from *Gerald Metals*, 132 F.3d at 722), 877-79. We note that one relevant "other factor" may involve the presence of significant volumes of price-competitive nonsubject imports in the U.S. market, particularly when a commodity product is at issue. In appropriate cases, the Commission collects information regarding nonsubject imports and producers in nonsubject countries in order to conduct its analysis.

[47] *Nucor Corp. v. United States*, 414 F.3d 1331, 1336, 1341 (Fed. Cir. 2005); *see also Mittal Steel*, 542 F.3d at 879 ("*Bratsk* did not read into the antidumping statute a Procrustean formula for determining whether a domestic injury was 'by reason' of subject imports.").

[48] We provide in our discussion below a full analysis of other factors alleged to have caused any material injury experienced by the domestic industry.

[49] *Mittal Steel*, 542 F.3d at 873; *Nippon Steel Corp*., 458 F.3d at 1350, *citing U.S. Steel Group*, 96 F.3d at 1357; S. Rep. 96-249 at 75 ("The determination of the ITC with respect to causation is ... complex and difficult, and is a matter for the judgment of the ITC.").

[50] *See* CR/PR at II-7.

[51] *See* CR/PR at II-8. Petitioner states that while construction activity is a demand driver, construction spending is less informative, as an increase in prices for construction materials such as steel and the consequent increase in construction spending would not necessarily indicate an increase in construction activity. *See* Petitioner's Responses to Commission Questions at 5.

[52] *See* CR/PR at Table II-4 and Fig. II-1.

reported that demand had increased.[53] Further, most market participants reported that the COVID-19 pandemic was a factor that contributed to declining U.S. demand in 2020.[54]

Apparent U.S. consumption of SRC pipe and tube declined steadily throughout the POI.[55] It declined from 675.1 million pounds in 2018 to 659.6 million pounds in 2019 and to 647.4 million pounds in 2020.[56] Between 2018 and 2020, apparent U.S. consumption declined overall by 4.1 percent.[57]

2. Supply Considerations

In this investigation, domestically produced SRC pipe and tube and imports from subject and nonsubject countries supplied the U.S. market over the POI.

The domestic industry was the largest source of supply of SRC pipe and tube in the U.S. market throughout the POI. Its share of apparent U.S. consumption, by quantity, declined from 80.8 percent in 2018 to 79.9 percent in 2019 and to 75.3 percent in 2020.[58] The two largest U.S. producers, Mueller and Cerro, jointly accounted for *** percent of domestic production in 2020.[59] Total production capacity for the domestic industry exceeded apparent U.S. consumption each year of the POI,[60] but declined 3.4 percent from 2018 to 2020 as U.S. producers *** reduced their capacity.[61]

Subject imports were the single largest country source of U.S. imports of SRC pipe and tube in each year of the POI.[62] Subject imports' share of apparent U.S. consumption, by quantity, rose from 6.0 percent in 2018 to 6.8 percent in 2019 and to 9.9 percent in 2020.[63]

Nonsubject imports' share of apparent U.S. consumption, by quantity, increased from 13.2 percent in 2018 to 13.4 percent in 2019 and to 14.8 percent in 2020.[64] The largest country sources of nonsubject imports in 2020, in descending order, were Canada, Korea, Mexico,

---

[53] *See* CR/PR at Table II-5.

[54] *See* CR/PR at II-10, Table VI-5.

[55] Petitioners maintain that apparent U.S. consumption is an accurate reflection of demand for SRC pipe and tube in the U.S. market. *See* Petitioner's Responses to Commission Questions at 4.

[56] CR/PR at Tables IV-6 and C-1.

[57] CR/PR at Tables IV-6 and C-1.

[58] CR/PR at Tables IV-7 and C-1. Thus, the domestic industry's share of apparent U.S. consumption declined by 5.5 percentage points during the POI. *Id.*

[59] *See* CR/PR at Table III-1.

[60] *Compare* CR/PR at Table III-4 *with* Table IV-6.

[61] *See* CR/PR at Tables III-4 and C-1. ***. *See id.* at III-4 to III-5. ***. *See id.* at III-5 n.4. ***. *See* Petitioner's Responses to Commission Questions at 29. ***. *See* CR/PR at Tables III-3 and VI-15.

[62] The volume of subject imports was 40.4 million pounds in 2018, 44.6 million pounds in 2019, and 64.1 million pounds in 2020. CR/PR at Table IV-2. The volume of the next largest country source of U.S. imports of SRC pipe and tube (Canada) was 27.8 million pounds in 2018, 29.5 million pounds in 2019, and 29.2 million pounds in 2020. *Id.* at Table IV-3.

[63] CR/PR at Tables IV-7 and C-1. Accordingly, subject imports' share of apparent U.S. consumption increased 3.9 percentage points during the POI. *Id.*

[64] CR/PR at Tables IV-7 and C-1. Thus, nonsubject imports' share of apparent U.S. consumption increased 1.6 percentage points during the POI.

Thailand, and Greece.[65] U.S. imports of SRC pipe and tube from China and Mexico have been subject to antidumping duty orders since November 22, 2010.[66]

3. Substitutability and Other Conditions

We find that there is a high degree of substitutability between domestically produced SRC pipe and tube and subject imports from Vietnam.[67] All responding U.S. producers and purchasers, and the vast majority of importers (16 of 19), reported that SRC pipe and tube from the United States and Vietnam are "always" or "frequently" interchangeable.[68] All responding purchasers reported that SRC pipe and tube from the United States "always" or "usually" met minimum quality specifications, and all but one purchaser (12 of 13) reported that SRC pipe and tube imported from Vietnam "always" or "usually" met minimum quality specifications.[69] Furthermore, most responding purchasers reported that SRC pipe and tube from the United States and from Vietnam were "comparable" with respect to all purchasing factors, except delivery time (for which most purchasers rated SRC pipe and tube from the United States as "superior") and price (for which most purchasers rated SRC pipe and tube from the United States as "inferior," *i.e.*, higher priced).[70]

We further find that price is an important factor in purchasing decisions, although quality and availability/supply are also important factors. Responding purchasers most often cited among their top three purchasing factors price/cost (cited 20 times), quality (cited 15 times), and availability/supply (cited 12 times).[71] All 22 responding purchasers rated price to be

[65] *See* CR/PR at Table IV-3. Nonsubject imports from Thailand increased by nearly five thousand percent from 2018 to 2020. *See id*. at IV-4. Petitioner attributes this increase to a decision by Hailiang (Vietnam) Copper Manufacturing Company Limited ("Hailiang"), the largest producer of subject imports in Vietnam, to shift production to Thailand at around the same time that the petition was filed. *See* Petitioner's Prehearing Brief at 12, 25-26; *see also* Petitioner's Responses to Commission Questions at 8 (asserting that "{w}ith an antidumping duty order on imports of SRC tube from China, the filing of the instant petition on SRC tube from Vietnam … caused Vietnam's largest producer/exporter – Hailiang – to shift its export platform to Thailand."), *id*. (***)

[66] *See* CR/PR at I-5.

[67] *See* CR/PR at II-11.

[68] *See* CR/PR at Table II-11.

[69] *See* CR/PR at Table II-12.

[70] *See* CR/PR at Table II-10.

[71] *See* CR/PR at Table II-7. Quality was the most frequently cited first-most important factor (cited 11 times), followed by price/cost (cited five times) and availability/supply (cited one time). Price/cost was the most frequently cited second-most important factor (cited 10 times), followed by availability/supply (cited six times) and quality (cited two times). Price/cost and availability/supply were the most frequently cited third-most important factor (cited five times each), followed by quality (cited two times). *See id.*

a "very important" purchasing factor.[72] Moreover, the majority of responding purchasers (14 of 22) reported that they "always" or "usually" purchase the lowest-priced product.[73]

All responding U.S. producers and a majority (14 of 19) of importers reported that differences other than price are "sometimes" or "never" significant in sales of U.S. produced SRC pipe and tube compared to Vietnamese SRC pipe and tube. Some importers (five of 19) and a majority (12 of 15) of responding purchasers indicated that differences other than price are "always" or "frequently" significant in such comparisons,[74] citing quality, availability, delivery terms, and specific/unique design features as non-price purchasing factors.[75] Most responding purchasers, however, reported that the domestic like product was "comparable" or "superior" to subject imports on these purchasing factors.[76]

The primary raw material used in the production of SRC pipe and tube is metallic copper, either in the form of copper cathodes or copper scrap.[77] The prices for copper cathodes and copper scrap decreased irregularly from January 2018 through April 2020, when they reached their lowest levels of the POI, before increasing steadily through the remainder of the POI and reaching their highest levels in April 2021.[78] Prices for copper cathodes and copper scrap increased by approximately one third overall from January 2018 to April 2021.[79] All responding U.S. producers indicated that raw material prices either increased or fluctuated during the POI,[80] although raw materials as a share of the U.S. producers' cost of goods sold ("COGS") decreased irregularly over the POI, decreasing from *** percent in 2018 to *** percent in 2019 and then increasing to *** percent in 2020.[81]

Both U.S. producers and importers reported that SRC pipe and tube prices are largely based on copper prices but are subject to separate pricing methods depending upon end use. SRC pipe and tube for plumbing applications are sold in the spot market with the price based on a published price list, adjusted to account for copper prices and other market conditions, and a discount multiplier off of the published price.[82] SRC pipe and tube for commercial applications are sold pursuant to annual contracts with the price based on a fabrication charge and the cost

---

[72] *See* CR/PR at Table II-8. The purchasing factors rated as "very important" by the most purchasers were price (22 purchasers), availability (21 purchasers), product consistency and quality meets industry standards (20 purchasers each), and reliability of supply (19 purchasers). *See id.*

[73] CR/PR at II-12. The remaining eight purchasers reported that they sometimes purchase the lowest-priced product. *Id.*

[74] *See* CR/PR at Table II-13.

[75] CR/PR at II-19.

[76] *See* CR/PR at Table II-10.

[77] *See* CR/PR at V-1. U.S. producers' raw material costs for producing SRC pipe and tube consisted of 61.3 percent copper cathodes, 34.0 percent copper scrap, and 4.7 percent other material inputs in 2020. *Id.*

[78] *See* CR/PR at Fig. V-1.

[79] *See* CR/PR at Table V-1.

[80] CR/PR at V-1.

[81] *See* CR/PR at Table VI-1. Thus, raw materials as a share of U.S. producer's COGS decreased 2.8 percentage points over the POI. *See id.*

[82] *See* CR/PR at V-4. The multiplier, which is the "basis of competition among producers," is not published and is communicated verbally to purchasers. *See id.* & n.7.

of the copper metal, which is considered a "pass through" to customers.[83] U.S. producers reported selling the majority (*** percent) of their SRC pipe and tube in the spot market and *** percent via contracts, while importers reported selling almost all (*** percent) of subject imports in the spot market.[84] U.S. producers and importers reported setting prices using transaction-by-transaction negotiations, contracts, and set price lists.[85]

Finally, both U.S. producers and importers shipped substantial volumes of product to distributors. Specifically, U.S. producers reported that a majority of their SRC pipe and tube was shipped to distributors (*** percent in 2020).[86] Responding importers reported that nearly all of their U.S. shipments were made to distributors (*** percent in 2020).[87]

C. Volume of Subject Imports

Section 771(7)(C)(i) of the Tariff Act provides that the "Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant."[88]

The volume of subject imports increased from 40.4 million pounds in 2018 to 44.6 million pounds in 2019 and to 64.1 million pounds in 2020, for an overall increase of 58.8 percent during the POI.[89]

The share of apparent U.S. consumption held by subject imports also increased, from 6.0 percent in 2018 to 6.8 percent in 2019 and to 9.9 percent in 2020. During the POI, subject imports gained 3.9 percentage points of market share.[90]

We find that the volume of subject imports and the increase in that volume are significant both in absolute terms and relative to U.S. consumption.

---

[83] *See* CR/PR at V-4. Competition for sales to industrial users is based upon the fabrication charge. *See id.*

[84] *See* CR/PR at Table V-3.

[85] *See* CR/PR at Table V-2.

[86] In 2018 and 2019, *** percent of U.S. producers' U.S. shipments went to distributors, while *** percent went to end users. In 2020, *** percent went to distributors, while *** went to end users. CR/PR at Table II-1.

[87] In 2018, *** percent of responding importers' U.S. shipments of subject imports went to distributors, while *** percent went to end users. In 2019, *** percent went to distributors, while *** percent went to end users. In 2020, *** percent went to distributors, while *** percent went to end users. CR/PR Table II-1. We recognize that the share of subject import shipments made to end users may be understated due to the incomplete questionnaire coverage of importers of SRC pipe and tube from Vietnam. Questionnaire responses from responding importers accounted for more than two-thirds (*i.e.*, 67.8 percent) of subject imports from Vietnam in 2020 based on official import statistics, and one of the main importers of subject imports, Hong Kong Hailiang, did not provide a questionnaire response despite several attempts by Commission staff to obtain one. *See* CR/PR at I-4 n.8, IV-1.

[88] 19 U.S.C. § 1677(7)(C)(i).

[89] CR/PR at Tables IV-2 and C-1.

[90] *See* CR/PR at Tables IV-7 and C-1.

D. Price Effects of the Subject Imports

Section 771(7)(C)(ii) of the Tariff Act provides that, in evaluating the price effects of the subject imports, the Commission shall consider whether

> (I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and
>
> (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.[91]

As discussed above, the record indicates that there is a high degree of substitutability between domestically produced SRC pipe and tube and subject imports, and that price is an important consideration in purchasing decisions, together with quality and availability/supply.

The Commission collected quarterly pricing data for the total quantity and f.o.b. value of six pricing products shipped by U.S. producers and importers to unrelated U.S. customers during the POI.[92] Five U.S. producers and three importers provided usable pricing data, although not all firms reported pricing for all products for all quarters.[93] Pricing data reported by these firms accounted for approximately *** percent of the value of U.S. producers' U.S. shipments of SRC pipe and tube and *** percent of the value of U.S. shipments of subject imports from Vietnam in 2020.[94]

---

[91] 19 U.S.C. § 1677(7)(C)(ii).

[92] The six pricing products are:

Product 1.-- Seamless refined copper pipe and tube, 3/8'' OD, ACR/RST Coil, 50' Length.

Product 2.-- Seamless refined copper pipe and tube, 3/4'' OD, ACR/RST Coil, 50' Length.

Product 3.-- Seamless refined copper pipe and tube, 3/8'' OD, Inner-Grooved LWC, 0.0110'' - 0.0144'' bottom wall thickness.

Product 4.-- Seamless refined copper pipe and tube, 3/8'' OD, Smooth Bore LWC, 0.0249'' - 0.0327'' bottom wall thickness.

Product 5.-- Seamless refined copper pipe and tube, 1/4'' OD, Smooth Bore LWC, 0.0200'' - 0.0340'' bottom wall thickness.

Product 6.-- Seamless refined copper pipe and tube, 1/2'' OD, Smooth Bore LWC, 0.0160'' - 0.0330'' bottom wall thickness. CR/PR at V-6 to V-7.

[93] CR/PR at V-7.

[94] CR/PR at V-7. Pricing data coverage is expressed in terms of value because pricing data for products 1-2 were collected by quantity measured in pieces of SRC pipe and tube, while pricing data for products 3-6 were collected by quantity measured in pounds. *See id.* at Tables V-4 to V-9.

In 2020, products 1 and 2 accounted for *** percent of the pricing data reported by U.S. producers and *** percent of the pricing data reported by importers, by value. CR/PR at V-19 n. 15. Conversely, products 3 through 6 accounted for *** percent of the pricing data reported by U.S. producers and *** percent of the pricing data reported by importers, by value. *Id.* ***. *Id*. at V-7 n.14.

Subject imports undersold the domestic like product in all 35 (or 100 percent of) quarterly comparisons, at margins ranging from 1.8 to 19.9 percent.[95] Quarters in which subject imports undersold the domestic like product accounted for all reported subject import sales volume, including sales of *** pieces for products 1-2 and *** pounds for products 3-6.[96]

In addition, information collected in response to lost sales allegations also supports a finding that subject imports were generally priced lower than the domestic like product. Most responding purchasers that reported purchasing subject imports instead of the domestic like product indicated that subject import prices were lower than domestic prices. Specifically, of 23 responding purchasers, 11 reported purchasing subject imports instead of the domestic like product since 2018. Nine of these 11 purchasers reported that the subject imports were priced lower than the U.S.-produced product, and six purchasers stated that price was a primary reason for their decision to purchase subject imports instead of the domestic like product. Five of these six purchasers estimated the volume of their purchases of subject imports instead of the domestic like product, which collectively totaled *** pounds.[97]

Based on the high degree of substitutability between domestically produced SRC pipe and tube and subject imports, the importance of price in purchasing decisions, the pricing data showing universal underselling, and the information collected in response to lost sales allegations, we find that subject import underselling was significant during the POI. As subject imports undersold the domestic like product throughout the POI, subject imports captured 3.9 percentage points of market share from the domestic industry.[98]

We have also considered price trends for the domestic like product and subject imports during the POI. Domestic prices for all pricing products declined from the first quarter of 2018 through the second quarter of 2020 before increasing through the fourth quarter of 2020, following the same general trend as prices for copper cathodes and copper scrap.[99] Subject import prices for products 1 and 2, the only products for which importers reported pricing data for all quarters in the POI and that comprise nearly all reported subject import sales of pricing products, showed a similar trend.[100] From the first quarter of 2018 to the last quarter of 2020, prices for domestically produced pricing products 1, 2, and 5 increased by *** percent, *** percent, and *** percent, respectively, and prices for domestically produced pricing products 3,

---

[95] CR/PR at Table V-11. For products ***, subject imports consisting of *** pieces undersold the domestic like product in all *** quarterly comparisons, at margins ranging from *** to *** percent. *Id.* For products ***, subject imports consisting of *** pounds undersold the domestic like product in all *** quarterly comparisons, at margins ranging from *** to *** percent. *Id.*

[96] CR/PR at Table V-11.

[97] CR/PR at Table V-13. In addition, Petitioner provided examples of internal emails memorializing verbal communications and written feedback or documentation received from a customer regarding the lower prices of subject imports and sales lost to subject imports due to price. *See* Petitioner's Responses to Commission Questions at Exhibit 1. We also note that most responding purchasers (10 of 14) rated the price of SRC pipe and tube from the United States as "inferior," *i.e.*, higher priced, when compared to the price of SRC pipe and tube imported from Vietnam. *See* CR/PR at Table II-10.

[98] *See* CR/PR at Tables IV-7, V-11, and C-1.

[99] *See* CR/PR at Figs. V-1 to V-7.

[100] *See* CR/PR at Figs. V-2 to V-3, V-19 n.15.

4, and 6 decreased slightly.[101] While reported sales of domestically produced products 3, 4, and 6 comprise the *** of reported domestic producer sales of pricing products,[102] there were *** and *** subject import sales of products 4 and 6.[103] Apparent U.S. consumption of SRC pipe and tube also declined over the POI, by 4.1 percent overall.[104] Given this, we cannot conclude that subject imports had significant price depressing effects on the prices of the domestic like product.

We have also considered whether subject imports prevented price increases which would otherwise have occurred to a significant degree. The domestic industry's COGS to net sales ratio increased from 92.1 percent in 2018 to 92.6 percent in 2020, for an overall increase of 0.6 percentage points from 2018 to 2020.[105] The industry's unit raw material costs declined from $*** per thousand pounds in 2018 to $*** per thousand pounds in 2020 as did the industry's unit labor costs, which declined from $*** per thousand pounds in 2018 to $*** per thousand pounds in 2020.[106] Although factory overhead costs increased from $*** per thousand pounds in 2018 to $*** per thousand pounds in 2020, this appears to be a function of *** reported by *** in 2019 rather than the type of production related costs that producers would more reasonably expect to pass through to customers.[107] Further, as discussed above, although domestic producer prices declined from the first quarter of 2018 to the second quarter of 2020, this decline follows the general trend in copper metal prices as does the rise in domestic producer prices from the second quarter of 2020 through the fourth quarter of 2020 when copper metal prices also trended upward.[108] We also observe that the largest increase in

---

[101] *See* CR/PR at Table V-10.

[102] *See* CR/PR at V-19 n.15.

[103] The per-unit domestic price for product 3 decreased by *** percent from $*** in the first quarter of 2018 to $*** in the last quarter of 2020; ***. *See* CR/PR at Tables V-6 and V-10. The per-unit domestic price for product 4 decreased by 1.9 percent from $3.81 in the first quarter of 2018 to $3.74 in the last quarter of 2020; there were only *** quarters of subject import sales of product 4, corresponding to sales of *** pounds. *See id.* at Tables V-7 and V-10. The per-unit domestic price for product 6 decreased by 3.8 percent from $3.87 in the first quarter of 2018 to $3.72 in the last quarter of 2020; there were only *** quarters of subject import sales of product 6, corresponding to sales of *** pounds. *See id.* at Tables V-9 and V-10.

We also observe that only two of 23 responding purchasers reported that U.S. producers had reduced prices in order to compete with lower-priced subject imports. *See* CR/PR at Table V-14. Petitioner also acknowledged that the overlap of subject import and domestic like product quarterly pricing data for products 4 and 6 occurred during the parts of the POI when copper metal prices were decreasing, and that, with prices of *** and in light of declining apparent U.S. consumption, the Commission was unlikely to find significant price depression. *See* Petitioner's Responses to Commission Questions at 20, 24.

[104] CR/PR at Tables IV-6 and C-1.

[105] CR/PR at Tables VI-1 and C-1.

[106] CR/PR at Table VI-1.

[107] *See* CR/PR at VI-15 (***), Table VI-3 (showing *** other factory costs increasing from $*** per 1,000 pounds in 2018 to $*** per 1,000 pounds in 2019, or by *** percent).

[108] *See* CR/PR at Figs. V-1 to V-7.

subject import volume and market share, between 2019 and 2020,[109] was accompanied by a decline in the domestic industry's COGS to net sales ratio with net sales average unit value ("AUV") rising by more than unit COGS.[110] These data point to a correlation between copper metal and domestic producer price trends whereas there is a lack of correlation between subject import volumes and domestic producer prices. Moreover, apparent U.S. consumption declined over the POI by 4.1 percent from 675.1 million pounds in 2018 to 647.4 million pounds in 2020, which may also have impacted the ability of domestic producers to fully pass on their increase in COGS.[111] In light of the foregoing, including the relatively small increase in the COGS to net sales ratio over the POI, we cannot conclude that subject imports prevented price increases which otherwise would have occurred to a significant degree.

In sum, we find that subject imports significantly undersold the domestic like product. Further, this significant underselling allowed subject imports to capture significant market share at the expense of the domestic industry. We consequently find that the subject imports had significant price effects.

E. Impact of the Subject Imports[112]

Section 771(7)(C)(iii) of the Tariff Act provides that examining the impact of subject imports, the Commission "shall evaluate all relevant economic factors which have a bearing on the state of the industry."[113] These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debts, research and development ("R&D"), and factors affecting domestic prices. No

[109] Subject imports increased by 43.7 percent from 2019 to 2020, compared to a 10.5 percent increase from 2018 to 2019. CR/PR at Tables IV-6 and C-1. Further, subject imports' share of apparent U.S. consumption increased by 3.1 percentage points from 2019 to 2020, compared to a 0.8 percentage point increase from 2018 to 2019. CR/PR at Tables IV-7 and C-1.

[110] The domestic industry's COGS to net sales ratio decreased from 93.0 percent in 2019 to 92.6 percent in 2020, or by 0.4 percentage points. CR/PR at Tables VI-1 and C-1. Its net sales AUV increased by 0.9 percent from 2019 to 2020, while its unit COGS increased by 0.5 percent. *Id.* at Table VI-2.

[111] CR/PR at Table IV-7.

[112] 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 determination of sales at less value, Commerce found a dumping margin of 8.35 percent for imports from Vietnam. Commerce Final Determination, 33228 Fed. Reg. at 33229-30. We take into account in our analysis the fact that Commerce has made final findings that all subject producers in Vietnam 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 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.

[113] 19 U.S.C. § 1677(7)(C)(iii); *see also* SAA at 851 and 885 ("In material injury determinations, the Commission considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they also may demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.").

single factor is dispositive and all relevant factors are considered "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[114]

The domestic industry's trade-related indicators all declined throughout the POI, with inventories fluctuating but increasing overall from 2018 to 2020. Its capacity decreased from 945.3 million pounds in 2018 to 943.6 million pounds in 2019 and to 912.9 million pounds in 2020, for a 3.4 percent overall decline during the POI.[115] The domestic industry's production decreased from 572.3 million pounds in 2018 to 545.6 million pounds in 2019 and to 511.4 million pounds in 2020, for a 10.7 percent overall decline.[116] Capacity utilization decreased from 60.5 percent in 2018 to 57.8 percent in 2019 and to 56.0 percent in 2020, for a 4.5 percentage point overall decline.[117]

Consistent with the domestic industry's declining capacity and production, the domestic industry's employment indicators generally declined from 2018 to 2020, with production and related workers ("PRWs"), total hours worked, hours worked per PRW, and wages paid all decreasing overall, while hourly wages and productivity increased. The number of PRWs increased from 2,285 in 2018 to 2,312 in 2019 and decreased to 2,208 in 2020, for a 3.4 percent overall decline.[118] Total hours worked decreased from 5.4 million hours in 2018 to 5.1 million hours in 2019 and to 4.5 million hours in 2020, for a 16.0 percent overall decline.[119] The domestic industry's hours worked per PRW decreased from 2,367 hours in 2018 to 2,223 hours in 2019 and to 2,058 hours in 2020, declining by 13.1 percent overall.[120] Its wages paid increased from $112.0 million in 2018 to $114.4 million in 2019 and decreased to $108.7 million in 2020, for an overall decline of 3.0 percent.[121] The domestic industry's hourly wages increased from $20.71 per hour in 2018 to $22.27 per hour in 2019 and to $23.92 per hour in 2020, a 15.5 percent overall increase.[122] Productivity per hour increased from 105.8 pounds in 2018 to 106.1 pounds in 2019 and to 112.5 pounds in 2020, for a 6.3 percent overall increase.[123]

The domestic industry's production declined as a direct consequence of the industry's declining U.S. shipments and market share. Its U.S. shipments, by quantity, decreased from 545.4 million pounds in 2018 to 526.9 million pounds in 2019 and to 487.5 million pounds in 2020, for a 10.6 percent overall decline.[124] The industry's share of apparent U.S. consumption, by quantity, decreased from 80.8 percent in 2018 to 79.9 percent in 2019 and to 75.3 percent in 2020, for a 5.5 percentage point overall decline.[125]

---

[114] 19 U.S.C. § 1677(7)(C)(iii). This provision was amended by the Trade Preferences Extension Act ("TPEA") of 2015, Pub. L. 114-27.

[115] CR/PR at Tables III-4 and C-1.

[116] CR/PR at Tables III-4 and C-1.

[117] CR/PR at Tables III-4 and C-1.

[118] CR/PR at Tables III-14 and C-1.

[119] CR/PR at Tables III-14 and C-1.

[120] CR/PR at Table III-14.

[121] CR/PR at Tables III-14 and C-1.

[122] CR/PR at Tables III-14 and C-1.

[123] CR/PR at Tables III-14 and C-1.

[124] CR/PR at Tables III-6 and C-1.

[125] CR/PR at Tables IV-7 and C-1.

The domestic industry's end-of-period inventories decreased from 40.6 million pounds in 2018 to 40.3 million pounds in 2019 and increased to 47.2 million pounds in 2020, for a 16.3 percent overall increase.[126] The industry's end-of-period inventories as a share of total shipments increased from *** percent in 2018 to *** percent in 2019 and to *** percent in 2020, for a *** percentage point overall increase.[127]

The domestic industry's net sales value, gross profits, operating income, and net income all declined overall from 2018 to 2020, as subject imports captured market share from the industry. Net sales value decreased from $2.1 billion in 2018 to $1.9 billion in 2019 and to $1.8 billion in 2020, for an overall decline of 14.9 percent.[128] Gross profits decreased from $168.6 million in 2018 to $135.5 million in 2019 and to $133.4 million in 2020, for an overall decline of 20.9 percent.[129] The domestic industry's operating income decreased from $43.8 million in 2018 to $9.7 million in 2019 and increased to $20.3 million in 2020, for an overall decline of 53.8 percent.[130] Its operating income-to-net sales ratio decreased from 2.1 percent in 2018 to 0.5 percent in 2019 and increased to 1.1 percent in 2020, decreasing by 0.9 percentage points overall.[131] The domestic industry's net income decreased from $29.1 million in 2018 to negative $6.7 million in 2019 and increased to $1.5 million in 2020, for an overall decline of 95.0 percent.[132] The industry's cash flow decreased from $*** in 2018 to $*** in 2019 and increased to $*** in 2020, for an overall decline of *** percent.[133]

The domestic industry's capital expenditures increased from $18.4 million in 2018 to $29.7 million in 2019 and decreased to $20.5 million in 2020, for a 11.3 percent overall increase.[134] The industry's net assets decreased from $722.8 million in 2018 to $705.1 million in 2019 and to $668.0 million in 2020, for a 7.6 percent overall decline.[135] Its return on assets decreased overall from 2018 to 2020.[136] Three of the six domestic producers reported actual negative effects on investment, growth, and development and four of six reported anticipated negative effects due to the subject imports.[137]

---

[126] CR/PR at Tables III-8 and C-1.

[127] CR/PR at Tables III-8 and C-1.

[128] CR/PR at Tables VI-1 and C-1.

[129] CR/PR at Tables VI-1 and C-1.

[130] CR/PR at Tables VI-1 and C-1. The increase in operating income from 2019 to 2020 was mainly attributable to ***. *See id.* at VI-16.

[131] CR/PR at Tables VI-1 and C-1.

[132] CR/PR at Tables VI-1 and C-1. The domestic industry's net income-to-net sales ratio decreased from 1.4 percent in 2018 to negative 0.3 percent in 2019 and increased to 0.1 percent in 2020, decreasing by 1.3 percentage points overall. *Id*.

[133] CR/PR at Table VI-1.

[134] CR/PR at Tables VI-7 and C-1. Only *** reported R&D expenses of $*** in 2020. *Id.* at Table VI-9.

[135] CR/PR at Tables VI-11 and C-1.

[136] *See* CR/PR at Table VI-12. The domestic industry's return on assets decreased from 6.1 percent in 2018 to 1.4 percent in 2019 and increased to 3.0 percent in 2020, decreasing overall by 3.1 percentage points. *Id.*

[137] *See* CR/PR at Tables VI-15 and VI-16.

We find a causal nexus between subject imports and the domestic industry's declining performance during the POI. The significant and increasing volume of low-priced subject imports that were highly substitutable with the domestic like product took sales and captured 3.9 percentage points of market share from the domestic industry between 2018 and 2020, while apparent U.S. consumption decreased.[138] As a result, the domestic industry's production, capacity utilization, shipments, sales, and revenues declined. In turn, the industry's profitability deteriorated. For these reasons, we find that subject imports had a significant impact on the domestic industry.

We have also considered whether factors other than subject imports had an impact on the domestic industry during the period of investigation so as not to attribute to subject imports any injury caused by other factors. Although apparent U.S. consumption declined during the POI, the domestic industry's U.S. shipments decreased at a greater rate. Specifically, while apparent U.S. consumption declined by 2.3 percent from 2018 to 2019, the domestic industry's U.S. shipments declined by 3.4 percent, and while apparent U.S. consumption declined by 1.8 percent from 2019 to 2020, the domestic industry's U.S. shipments declined by 7.5 percent.[139] Accordingly, we find that declining apparent U.S. consumption cannot fully explain the magnitude of the declines in the domestic industry's U.S. shipments, nor does it explain the domestic industry's loss of market share to subject imports during the POI.

We have also considered nonsubject imports. Nonsubject imports combined were the second largest source of supply throughout the POI, increasing their share of apparent U.S. consumption from 13.2 percent in 2018 to 14.8 percent in 2020.[140] Nevertheless, the AUVs of U.S. imports of nonsubject imports were consistently above those of subject imports, as well as those of U.S. shipments of domestically produced SRC pipe and tube, throughout the POI.[141] Moreover, subject imports captured more market share from the domestic industry, 3.9 percentage points, than nonsubject imports, which captured 1.6 percentage points.[142] Thus, the increasing presence of nonsubject imports does not sever the causal link between subject imports and the domestic industry's declining performance.

In sum, based on the record of the final phase of the investigation, we conclude that subject imports had a significant impact on the domestic industry.

---

[138] As noted above, domestic producers' market share decreased overall by 5.5 percentage points from 2018 to 2020. *See* CR/PR at Tables IV-7 and C-1.

[139] *See* CR/PR at Tables III-6, IV-6, and C-1.

[140] *See* CR/PR at Tables IV-7 and C-1.

[141] Nonsubject imports' unit values were $4,011 per 1,000 pounds in 2018, $3,873 per 1,000 pounds in 2019, and $3,858 per 1,000 pounds in 2020. CR/PR at Table IV-2. Subject imports' unit values were $3,542 per 1,000 pounds in 2018, $3,401 per 1,000 pounds in 2019, and $3,262 per 1,000 pounds in 2020. *Id.* The domestic industry's unit U.S. shipment values were $3,731 per 1,000 pounds in 2018, $3,506 per 1,000 pounds in 2019, and $3,527 per 1,000 pounds in 2020. CR/PR at Table III-6. We recognize that comparisons of the AUV of U.S. imports of nonsubject imports and subject imports and U.S. shipments of the domestic industry may be influenced by differences in product mix and changes in product mix over time.

[142] *See* CR/PR at Tables IV-7 and C-1.

V. Conclusion

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of subject imports of SRC pipe and tube from Vietnam found by Commerce to be sold in the United States at less than fair value.

Part I: Introduction

Background

This investigation results from a petition filed with the U.S. Department of Commerce ("Commerce") and the U.S. International Trade Commission ("USITC" or "Commission") by the American Copper Tube Coalition ("ACTC" or "petitioner"), consisting of Mueller Group,[1] Collierville, Tennessee, and Cerro Flow Products, LLC ("Cerro"), Sauget, Illinois, on June 30, 2020, alleging that an industry in the United States is materially injured and threatened with material injury by reason of less-than-fair-value ("LTFV") imports of seamless refined copper pipe and tube ("SRC pipe and tube")[2] from Vietnam. The following tabulation provides information relating to the background of this investigation.[3]

Effective date	Action
June 30, 2020	Petition filed with Commerce and the Commission; institution of Commission investigation (85 FR 40680, July 7, 2020)
July 20, 2020	Commerce's notice of initiation (85 FR 47181, August 4, 2020)
August 14, 2020	Commission's preliminary determination (85 FR 51490, August 20, 2020)
February 1, 2021	Commerce's preliminary determination (86 FR 7698); scheduling of final phase of Commission investigation (86 FR 10994, February 23, 2021)
June 15, 2021	Originally scheduled date for the Commission's hearing (Canceled per 86 FR 32277, June 17, 2021)
June 24, 2021	Commerce's final determination (86 FR 33228)
July 19, 2021	Commission's vote
August 5, 2021	Commission's views

[1] Mueller Group ("Mueller") consists of Mueller Copper Tube Products, Inc., Mueller Copper Tube West Co., Mueller Copper Tube Company, Inc., Howell Metal Company, and Linesets, Inc. Petition, p. 1.

[2] See the section entitled "The subject merchandise" in Part I of this report for a complete description of the merchandise subject in this proceeding.

[3] Pertinent *Federal Register* notices are referenced in appendix A, and may be found at the Commission's website (www.usitc.gov). Appendix B presents the *Federal Register* notice cancelling the Commission's hearing.

Statutory criteria

Section 771(7)(B) of the Tariff Act of 1930 (the "Act") (19 U.S.C. § 1677(7)(B)) provides that in making its determinations of injury to an industry in the United States, the Commission--

> *shall consider (I) the volume of imports of the subject merchandise, (II) the effect of imports of that merchandise on prices in the United States for domestic like products, and (III) the impact of imports of such merchandise on domestic producers of domestic like products, but only in the context of production operations within the United States; and. . . may consider such other economic factors as are relevant to the determination regarding whether there is material injury by reason of imports.*

Section 771(7)(C) of the Act (19 U.S.C. § 1677(7)(C)) further provides that--[4]

> *In evaluating the volume of imports of merchandise, the Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States is significant.. . .In evaluating the effect of imports of such merchandise on prices, the Commission shall consider whether. . .(I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.. . . In examining the impact required to be considered under subparagraph (B)(i)(III), the Commission shall evaluate (within the context of the business cycle and conditions of competition that are distinctive to the affected industry) all relevant economic factors which have a bearing on the state of the industry in the United States, including, but not limited to. . . (I) actual and potential decline in output, sales, market share, gross profits, operating profits, net profits, ability to service debt, productivity, return on investments, return on assets, and utilization of capacity, (II) factors affecting domestic prices, (III) actual and potential negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment, (IV) actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and (V) in {an antidumping investigation}, the magnitude of the margin of dumping.*

[4] Amended by PL 114-27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

In addition, Section 771(7)(J) of the Act (19 U.S.C. § 1677(7)(J)) provides that—[5]

(J) EFFECT OF PROFITABILITY.—The Commission may not determine that there is no material injury or threat of material injury to an industry in the United States merely because that industry is profitable or because the performance of that industry has recently improved.

Organization of report

Part I of this report presents information on the subject merchandise, dumping margins, and domestic like product. Part II of this report presents information on conditions of competition and other relevant economic factors. Part III presents information on the condition of the U.S. industry, including data on capacity, production, shipments, inventories, and employment. Parts IV and V present the volume of subject imports and pricing of domestic and imported products, respectively. Part VI presents information on the financial experience of U.S. producers. Part VII presents the statutory requirements and information obtained for use in the Commission's consideration of the question of threat of material injury as well as information regarding nonsubject countries.

Market summary

SRC pipe and tube are generally used in various applications, including water applications and plumbing; distribution systems for other liquids and gases; and thermal transfer applications including heating systems, commercial refrigeration systems (such as grocery store refrigerated cases), and combined or split-unit air conditioning systems.[6] The leading U.S. producers of SRC pipe and tube are Cerro and Mueller, while identified producers of SRC pipe and tube in Vietnam include Hailiang (Vietnam) Copper Manufacturing Company, Limited ("Hailiang"), JinTian Copper Industrial (Vietnam) Company Limited ("JinTian"), and Toan Phat Copper Joint Stock Company ("Toan Phat," also known as Ruby Copper).[7] The leading U.S. importers of SRC pipe and tube from Vietnam are ***, while leading importers of SRC pipe and tube from nonsubject countries include ***

[5] Amended by PL 114-27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.
[6] Petition, p. 7.
[7] Petition, exh. 20 and p. 33. Hailiang is the sole mandatory respondent in Commerce's investigation.

***.[8] Greece, Korea, and Thailand are other notable sources of nonsubject imports. U.S. purchasers of SRC pipe and tube are distributors of HVAC equipment or plumbing equipment and end users that produce HVAC equipment; leading responding purchasers include ***.

Apparent U.S. consumption of SRC pipe and tube totaled approximately 647.4 million pounds ($2.3 billion) in 2020. Currently, at least nine firms are believed to produce SRC pipe and tube in the United States, six of which provided data in response to the Commission's questionnaires. U.S. producers' U.S. shipments of SRC pipe and tube totaled 487.5 million pounds ($1.7 billion) in 2020, and accounted for 75.3 percent of apparent U.S. consumption by quantity and 74.8 percent by value. U.S. imports from subject sources totaled 64.1 million pounds ($209.2 million) in 2020 and accounted for 9.9 percent of apparent U.S. consumption by quantity and 9.1 percent by value. U.S. imports from nonsubject sources totaled 95.8 million pounds ($369.7 million) in 2020 and accounted for 14.8 percent of apparent U.S. consumption by quantity and 16.1 percent by value.

Summary data and data sources

A summary of data collected in this investigation is presented in appendix C, table C-1. Except as noted, U.S. industry data are based on questionnaire responses of six firms that are believed to account for the vast majority of U.S. production of SRC pipe and tube during 2020. U.S. imports are based on official import statistics for HTS statistical reporting numbers 7411.10.1030 and 7411.10.1090, the two statistical reporting numbers under the HTS subheading for seamless tubes and pipes of refined copper. Foreign producer and export data are based on the questionnaire responses of two firms, Vietnamese producer Toan Phat, and Summit Tech Limited ("Summit Tech"), an exporter of SRC pipe and tube from Vietnam. Toan Phat estimates it accounts for *** percent of production in Vietnam in 2020.

[8] ***.

Previous and related investigations

SRC pipe and tube has been the subject of prior antidumping duty investigations in the United States. Since November 22, 2010, Commerce has administered antidumping duty orders on SRC pipe and tube from China and Mexico.[9]

Nature and extent of sales at LTFV

On February 1, 2021, Commerce published a notice in the *Federal Register* of its preliminary determination of sales at LTFV with respect to imports from Vietnam.[10] On June 24, 2021, Commerce published a notice in the *Federal Register* of its final determination of sales at LTFV with respect to imports from Vietnam.[11] Table I-1 presents Commerce's dumping margins for all producers/exporters of SRC pipe and tube from Vietnam.

Table I-1
SRC pipe and tube: Commerce's weighted-average LTFV margins with respect to imports from Vietnam

Exporter	Producer	Preliminary dumping margin (percent)	Final dumping margin (percent)
Hailiang (Vietnam) Copper Manufacturing Company Limited/Hongkong Hailiang Metal Trading Limited (aka Hong Kong Hailiang Metal Trading Limited)	Hailiang (Vietnam) Copper Manufacturing Company Limited/Hongkong Hailiang Metal Trading Limited (aka Hong Kong Hailiang Metal Trading Limited)	8.05	8.35
Jintian Copper Industrial (Vietnam) Company Limited. (aka Jintian Copper Industrial (Vietnam) Co., Ltd)	Jintian Copper Industrial (Vietnam) Company Limited. (aka Jintian Copper Industrial (Vietnam) Co., Ltd)	8.05	8.35
Toan Phat Copper Tube Joint Stock Company	Toan Phat Copper Tube Joint Stock Company	8.05	8.35
All others		8.05	8.35

Source: 86 FR 7698, February 1, 2021; 86 FR 33228, June 24, 2021.

[9] 75 FR 71070, November 22, 2010. Dumping margins ranged from 11.25 to 60.85 percent for firms in China and from 24.89 percent to 27.16 percent for firms in Mexico. In its first review of these orders in 2016, the Commission found that revocation of the antidumping duty orders on SRC pipe and tube from China and Mexico would likely to lead to the continuation or recurrence of material injury to an industry in the United States. 81 FR 88704, December 8, 2016.

[10] 86 FR 7698, February 1, 2021.

[11] 86 FR 33228, June 24, 2021.

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:[12]

> *The products covered by this investigation are all seamless circular refined copper pipes and tubes, including redraw hollows, greater than or equal to 6 inches (152.4 mm) in actual length and measuring less than 12.130 inches (308.102 mm) in actual outside diameter (OD), regardless of wall thickness, bore (e.g., smooth, enhanced with inner grooves or ridges), manufacturing process (e.g., hot finished, cold-drawn, annealed), outer surface (e.g., plain or enhanced with grooves, ridges, fins, or gills), end finish (e.g., plain end, swaged end, flared end, expanded end, crimped end, threaded), coating (e.g., plastic, paint), insulation, attachments (e.g., plain, capped, plugged, with compression or other fitting), or physical configuration (e.g., straight, coiled, bent, wound on spools).*
>
> *The scope of this investigation covers, but is not limited to, seamless refined copper pipe and tube produced or comparable to the American Society for Testing and Materials (ASTM) ASTM-B42, ASTM-B68, ASTM-B75, ASTM-B88, ASTM-B88M, ASTM-B188, ASTM-B251, ASTM-B251M, ASTM-B280, ASTM-B302, ASTM-B306, ASTM-B359, ASTM-B743, ASTM-B819, and ASTM-B903 specifications and meeting the physical parameters described therein.*
>
> *Also included within the scope of this investigation are all sets of covered products, including "line sets" of seamless refined copper tubes (with or without fittings or insulation) suitable for connecting an outdoor air conditioner or heat pump to an indoor evaporator unit. The phrase "all sets of covered products" denotes any combination of items put up for sale that is comprised of merchandise subject to the scope.*
>
> *"Refined copper" is defined as: (1) Metal containing at least 99.85 percent by actual weight of copper; or (2) metal containing at least 97.5 percent by actual weight of copper, provided that the content by actual weight of any other element does not exceed the following limits:*

[12] 86 FR 7698, February 1, 2021.

ELEMENT	*LIMITING CONTENT PERCENT BY WEIGHT*
Ag – Silver	*0.25*
As – Arsenic	*0.5*
Cd – Cadmium	*1.3*
Cr – Chromium	*1.4*
Mg – Magnesium	*0.8*
Pb – Lead	*1.5*
S – Sulfur	*0.7*
Sn – Tin	*0.8*
Te – Tellurium	*0.8*
Zn – Zinc	*1.0*
Zr – Zirconium	*0.3*
Other elements (each)	*0.3*

Excluded from the scope of this investigation are all seamless circular hollows of refined copper less than 12 inches in actual length whose actual OD exceeds its actual length.

Tariff treatment

Based upon the scope set forth by Commerce, information available to the Commission indicates that the merchandise subject to this investigation is imported under statistical reporting numbers 7411.10.1030 and 7411.10.1090 of the Harmonized Tariff Schedule of the United States ("HTS"). The 2021 general rate of duty is 1.5 percent ad valorem for HTS subheading 7411.10.10. Products subject to the investigation may also be imported under HTS 7407.10.1500 (hollow profiles; general duty rate 3 percent ad valorem), 7419.99.5050 (miscellaneous articles of copper; general rate free), 8415.90.8065 (parts of heat pumps; general rate 1.4 percent ad valorem), and 8415.90.8085 (parts of other air conditioning machinery; general rate 1.4 percent ad valorem), depending upon their condition as imported. Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.[13]

[13] Products of China under these tariff provisions are subject to additional duties of 25 percent ad valorem under Section 301 of the Trade Act of 1974 (with the exception of such goods under HTS subheading 8415.90.80, which are subject to additional duties of 7.5 percent under Section 301). 84 FR 20459 and 85 FR 3741. However, as discussed in greater detail in Part IV, China is subject to a pre-existing antidumping duty order and is not at present a substantial source of U.S. imports of SRC pipe and tube.

The product

Description and applications[14]

SRC pipe and tube are fabricated products of refined copper, distinguished by a circular cross section of varying nominal outside diameter ("OD") sizes (typically 0.04"–12")[15] and wall thicknesses.[16] The tubing surfaces are either smooth, internally enhanced (e.g., with grooves or ridges), or externally enhanced (e.g., with fins, or gills). Enhancements are designed to improve the heat transfer ability of the tube and are typically produced by carving a helical shape in the inner or outer wall.[17] Additional characteristics can include: outer surface coatings for corrosion protection or insulation; marking or color coding for product identification; cleaning, pressurizing with nitrogen gas, and capping of each end; end finishes; and attachments. SRC pipe and tube are available in straight lengths, coiled flat without spools, or coiled onto spools. "Line sets" consist of two different sizes of SRC pipe and tube, a smaller diameter liquid line (commonly with end finishes) and a larger diameter suction line (commonly insulated), usually to connect outdoor air conditioners and heat pumps with indoor evaporator units.[18]

The variety of physical dimensions and characteristics available for SRC pipe and tube reflects the range of end-use applications that take advantage of copper's strength, malleability, ductility, thermal conductivity, corrosion resistance, and chemical (e.g., lead-free) purity. These applications generally involve fluids under pressure for either conveyance or closed-loop thermal transfer. Conveyance applications include residential, commercial, institutional, industrial, and municipal water systems, as well as distribution systems for other liquids and gases. Thermal transfer applications include residential, commercial, institutional, and industrial heating systems; commercial refrigeration systems; and combined or split-unit air-conditioning systems.

---

[14] Unless specified otherwise, information in this section is based on Petition, pp. 7–14.

[15] Capillary tube is available with actual OD sizes less than 0.04". The nominal size of 12" is equivalent to an OD of 12.130" (the upper width limit in the petition scope), or more specifically an actual OD of 12.125" with a tolerance of ± 0.005". *Seamless Refined Copper Pipe and Tube from China and Mexico, Investigation Nos. 731-TA-1174-1175 (Review)*, USITC Publication 4650, November 2016, p. I-17.

[16] "Refined copper" is defined in Commerce's scope as: (1) metal containing at least 99.85 percent by weight of copper; or (2) metal containing at least 97.5 percent by weight of copper, provided that the content by weight of any other element does not exceed specified limits.

[17] Petitioner's postconference brief, p. II-3.

[18] *Seamless Refined Copper Pipe and Tube from China and Mexico, Investigation Nos. 731-TA-1174-1175 (Review)*, USITC Publication 4650, November 2016, p. I-17.

"Plumbing" tube is commonly produced to various ASTM standards that specify the chemical composition, OD, wall thickness, strength, hardness, cleanliness, roundness, marking, and other requirements for SRC pipe and tube based on end-use applications (tables I-2, I-3, and I-4). "Commercial" (or "industrial") tube is produced to either industry standard specifications or customer nonstandard specifications, including any surface enhancements designed to improve thermal transfer capabilities. Individual purchasers may require more exacting specifications for industrial tubing than plumbing tubing.[19] Common applications for industrial SRC pipe and tube include refrigeration and heating units; split-system central, room and window, central, and vehicle air conditioners; and chillers and freezers.

[19] *Seamless Refined Copper Pipe and Tube from China and Mexico, Investigation Nos. 731-TA-1174-1175 (Review)*, USITC Publication 4650, November 2016, p. I-17.

Table I-2
SRC pipe and tube: ASTM standard, titles, and specified end-use applications

ASTM standard	Title	Specified end-use applications
B-42	Standard Specification for Seamless Copper Pipe, Standard Sizes	Plumbing and boiler feed lines
B-68	Standard Specification for Seamless Copper Tube, Bright Annealed	Refrigeration, oil lines, gasoline lines, and other applications requiring interior surfaces free of scale and dirt
B-75	Standard Specification for Seamless Copper Tube	General engineering applications
B-88	Standard Specification for Seamless Copper Water Tube	Water and fire-sprinkler systems
B-88M	Standard Specification for Seamless Copper Water Tube (Metric)	Water and fire-sprinkler systems
B-188	Standard Specification for Seamless Copper Bus Pipe and Tube	Electrical conductors
B-251	Standard Specification for Wrought Seamless Copper and Copper-Alloy Tube	Applications listed in ASTM B-68 and ASTM B-75
B-251M	Standard Specification for General Requirements for Wrought Seamless Copper and Copper-Alloy Tube (Metric)	Applications listed in ASTM B-68 and ASTM B-75
B-280	Standard Specification for Seamless Copper Tube for Air Conditioning and Refrigeration Field Service	Air conditioning and refrigeration units
B-302	Standard Specification for Threadless Copper Pipe, Standard Sizes	Assembled piping systems
B-306	Standard Specification for Copper Drainage Tube (DWV)	Sanitary drainage, waste, and vent piping
B-359	Standard Specification for Copper and Copper-Alloy Seamless Condenser and Heat Exchanger Tubes with Integral Fins	Surface condensers, evaporators, and heat exchangers
B-743	Standard Specification for Seamless Copper Tube in Coils	Refrigeration, air conditioning, and oil lines
B-819	Standard Specification for Seamless Copper Tube for Medical Gas Systems	Medical gas systems requiring specially cleaned interior surfaces
B-903	Standard Specification for Seamless Copper Tube for Heat Exchanger Tubes with Internal Enhancement	Refrigeration, air conditioning, and other heat exchangers

Source: Seamless Refined Copper Pipe and Tube from China and Mexico, Investigation Nos. 731-TA-1174-1175 (Review), USITC Publication 4650, November 2016, p. I-18.

Table I-3
SRC pipe and tube: Designations, color codes, ASTM standards, and applications

Designation	Color Code	ASTM standard	Applications
Type K (thicker walled)	Green	B-88	Water service and distribution Fire protection Solar energy Fuel and fuel oil Heating, ventilation, air conditioning Snow melting Compressed air Natural gas Liquefied petroleum gas Vacuums
Type L (intermediate walled)	Blue	B-88	Water service and distribution Fire protection Solar energy Fuel and fuel oil Heating, ventilation, air conditioning Snow melting Compressed air Natural gas Liquefied petroleum gas Vacuums
Type M (thinner walled)	Red	B-88	Water service and distribution Fire protection Solar energy Fuel and fuel oil Heating, ventilation, air conditioning Snow melting Vacuums
DWV	Yellow	B-306	Drain, waste, vent Heating, ventilation, air conditioning Solar energy
ACR/RST	Blue	B-280	Air conditioning Refrigeration Natural gas Liquefied petroleum gas Compressed air
OXY/MED	(K) Green (L) Blue	B-819	Medical gases Compressed air Vacuums

Source: Seamless Refined Copper Pipe and Tube from China and Mexico, Investigation Nos. 731-TA-1174-1175 (Review), USITC Publication 4650, November 2016, p. I-19. Petition, p. 7.

Note: Wall thicknesses differ for Types K, L, and M plumbing pipes having a common nominal diameter, being greater for Type K than for Type L, and lesser for Type M than for Type L.

Table I-4
SRC pipe and tube: Designations, types, nominal sizes, commercially available lengths

Designation	Type	Nominal size	Drawn length (feet)	Annealed length (feet)
Type K (thicker walled)	Straight lengths	¼–8 inches	20 feet	20 feet
Type K (thicker walled)	Straight lengths	10 inches	18 feet	18 feet
Type K (thicker walled)	Straight lengths	12 inches	12 feet	12 feet
Type K (thicker walled)	Coils	¼–1 inches	Not Applicable	60 and 100 feet
Type K (thicker walled)	Coils	1¼–1½ inches	Not Applicable	60 feet
Type K (thicker walled)	Coils	2 inches	Not Applicable	40 and 45 feet
Type L (intermediate walled)	Straight length	¼–10 inches	20 feet	20 feet
Type L (intermediate walled)	Straight length	12 inches	18 feet	18 feet
Type L (intermediate walled)	Coils	¼–1 inches	Not Applicable	60 and 100 feet
Type L (intermediate walled)	Coils	1¼–1½ inches	Not Applicable	60 feet
Type L (intermediate walled)	Coils	2 inches	Not Applicable	40 and 45 feet
Type M (thinner walled)	Straight length	¼–12 inches	20 feet	Not Applicable
DWV	Straight length	1¼–8 inches	20 feet	Not Applicable
ACR/RST	Straight length	⅜–4⅛ inches	20 feet	Not Applicable
ACR/RST	Coils	⅛–1⅝ inches	Not Applicable	50 feet
OXY/MED	Straight length	¼–8 inches	20 feet	Not Applicable

Source: Seamless Refined Copper Pipe and Tube from China and Mexico, Investigation Nos. 731-TA-1174-1175 (Review), USITC Publication 4650, November 2016, p. I-19.

Note: Wall thicknesses differ for Types K, L, and M plumbing pipes having a common nominal diameter, being greater for Type K than for Type L, and lesser for Type M than for Type L.

Note: Annealed ACR/RST pipe and tube are available in straight lengths by special order.

Manufacturing processes[20]

The manufacturing of SRC pipe and tube typically consists of three stages. Prefabrication includes melting, casting, and either extrusion or rolling of rough tubing. Intermediate fabrication consists of cold drawing of unfinished tubing. Finishing includes straightening or coiling as appropriate, interior and exterior surface treatment, and end finishing.

The starting material for SRC pipe and tube production is metallic copper in the form of whole or sections cut from refined cathodes, scrap, or cast ingots.[21] The exact input mix depends on the cost and availability of the various forms of copper, technical capabilities of the

[20] Unless specified otherwise, information in this section is based on Petition, pp. 7–14.
[21] A cathode contains at least 99.95 percent copper.

melting furnace, and customer specifications. The most common form of scrap consumed in the production of SRC pipe and tube is "runaround scrap" generated within the tube mill itself. Brick-shaped copper ingots cast from melted-down cathodes and scrap are more commonly consumed by SRC pipe and tube mills with smaller-scale melting furnaces with doors that cannot accommodate full cathode sections and baled scrap.

Prefabricating

Melting

The production process begins with melting and refining copper in a furnace to produce molten copper. A shaft furnace is adequate to melt high-purity cathodes, new scrap, and ingots into molten copper that does not need further refining. Alternatively, inclusion of less-pure old scrap in the initial furnace charge requires a reverberatory or other hearth-type furnace that allows for further refining of the molten copper.[22] The copper charge is melted at temperatures between 2,300° and 2,400° F (above the melting point of copper at 1,981° F), and fire-refined by exposure to oxygen. Most impurities are converted into oxides that are trapped in the surface slag, whereas less-readily oxidized impurities (especially tin and nickel) must be removed by reaction with a special slag compound. The molten copper is then stirred with greenwood poles ("poling"), which burn and vaporize to create a stirring motion that drives reactions to completion. After the surface slag is skimmed-off, the fire-refined melt exceeds 99.9 percent pure copper.[23] Phosphorous copper is added to deoxidize the molten copper to produce "phosphorous-deoxidized, high residual phosphorus copper."

[22] New scrap consists of pieces of refined copper recovered within the mill from downstream production steps. Old scrap consists of crushed and baled refined copper wire and tubing recovered from demolished or renovated structures, and may include various amounts of tin-lead solder, plastic insulation, or other materials still adhering to the copper.

[23] *Seamless Refined Copper Pipe and Tube from China and Mexico, Investigation Nos. 731-TA-1174-1175 (Review)*, USITC Publication 4650, November 2016, pp. I-20–I-21.

Casting

In the casting step, molten copper is transferred from the melting/refining furnace to either a holding furnace or a heated tundish (reservoir dam) to maintain the molten copper at constant temperature for casting. A layer of pulverized graphite protects the surface of the molten copper from oxidation. "Continuous casting" and "semi-continuous casting" are both well-established technologies for producing solid "logs" or thick-walled hollow "tube rounds." In the continuous casting process, molten copper flows into vertical graphite-lined cylindrical steel molds, which are water-cooled to solidify the copper quickly. The solidified copper is then gripped and withdrawn from the bottom as more molten copper is poured into the top of the mold. Some mills utilize casting molds with a central water-cooled core to produce a hollow tube round. A moving saw cuts the logs or shells into approximately two-foot-long sections for logs or approximately 30 to 60 feet for shells as it emerges from the casting machine. These sections, each weighing approximately 400 to 2,400 pounds, are now known as billets or shells. In the semi-continuous casting process, a water-cooled floor of the mold cavity seals the vertical mold until the molten copper solidifies. More molten copper is poured into the top of the mold at the same rate as the floor is lowered. When the log or tube round reaches the depth of the pit beneath the mold, the mold is (and central core are) raised to allow the log or tube round to be removed from the pit for sawing into shorter billets.

Extrusion/rolling

After casting has been completed, the resulting billets or tube rounds are processed by either the extrusion or the rolling process to produce a semi-finished copper tube profile used for further drawing into a finished product known as a redraw hollow or a "mother tube."[24] Both the extrusion and rolling processes are similar in terms of the quality of the product and the cost of production. The main difference relates to production scale, i.e., extrusion-based systems require more capital expenditure and have larger capacity (e.g., at least 150 million pounds). Therefore, depending upon the size of the investment that is planned, a company will employ one technology or the other.[25]

[24] The petitioner observed that U.S. producers Cambridge-Lee Industries ("Cambridge"), Mueller, and Wieland Holdings Inc. ("Wieland") have both extrusion and rolling production lines. GD Copper uses only rolling technology. Cerro uses only extrusion technology. The petitioner believes that both technologies are used in Vietnam. Petitioner's postconference brief, p. II-2.

[25] Petitioner's postconference brief, p. II-2.

In the extrusion process, the billet is preheated to approximately 1,535^{o} F and then placed in a horizontal extrusion press.[26] The press includes a ram fitted with a dummy block (that is smaller in diameter than the billet), and either a rod slightly smaller in diameter than that of the die opening if the billet was either cast hollow or already pierced, or a piercing mandrel if the billet is still solid.[27] The ram forces the heated copper over the rod or mandrel and through the die to form a long rough tube. The extruded rough tube is carried along a run-out table to maintain its straightness until it is cool enough to be cleaned and descaled.

In mills using the rolling process, after casting, a shell less than 12 inches in diameter is fed into a high reduction rolling mill, either by cylinder or continuous sleds. The rolling mill has a series of rolling heads that press on the outside of the shell causing a reduction in the outside diameter of the shell as well as the wall thickness of the shell. A mandrel is present during the rolling process to maintain a specific inside diameter of the shell. The reduced diameter shell travels down the run out table, and the nose as well as the tail of the shell are removed. The remaining portion of shell is coiled into a large coil and is passed down to the drawing section of the mill.[28]

Intermediate fabricating

The mother tube resulting from the prefabrication stage (irrespective of which of the different casting technologies was used) is successively cold drawn through a series of steel dies to reduce OD and wall thickness to final dimensions. Prior to drawing the tube through each die, a tapered plug mandrel is inserted into one end and that end is crimped to fit through the die and gripped by the jaws of the drawing machine. As the tube is drawn, the die and mandrel reduce the OD and wall thickness, respectively. The mandrel also imparts either a smooth or enhanced surface to the inside of the tube.

---

[26] *Seamless Refined Copper Pipe and Tube from China and Mexico, Investigation Nos. 731-TA-1174-1175 (Review)*, USITC Publication 4650, November 2016, p. I-21.

[27] If the reheated billet is solid, it must be pierced lengthwise with a mandrel (pointed rod) to form a hole through its center that will eventually become the inner wall of the resulting tubing. Solid billets can be pierced either prior to or concurrent with extrusion. However, billet piercing is no longer prevalent among major global producers.

[28] The rolling process can produce SRC pipe and tube with an OD of only up to 1.5 inches. Despite this limitation, the petitioner estimates that rolling producers can meet more than *** percent of commercial tube specifications, and more than *** percent of plumbing tube specifications. Petitioner's postconference brief, p. II-2.

Finishing

The finishing steps depend on the specific type of SRC pipe and tube being produced. Tubing to be sold as straight lengths is passed through a series of straightening rolls so that the tubing emerges straight and can be subsequently cut to length. Tubing to be sold in coils is passed through rolls that impart a bend of the coil radius as the tubing emerges from the coiler. Annealed tubing for thermal transfer applications is passed through a series of rollers and over a mandrel to impart enhancements to the inner surface. Similar enhancements can also be imparted to the outer surface by additional operations. For some SRC pipe and tube, the ends also can be finished by swaging, flaring, expanding, crimping, or threading.[29]

SRC pipe and tube are sold either as drawn ("hard") or annealed ("soft"). Annealing softens the finished product and enables the end-user to deform the copper tube (e.g., uncoiling coils; flaring or bending straight lengths; etc.).[30] SRC pipe and tube (either in straight lengths or coils) are annealed by passing through either a continuous (long, heated box) furnace or an in-line induction (short, electric-powered) furnace, heated at 1,300^{o} F in a non-reactive gas atmosphere to prevent oxidation of the copper. Some mills utilize bell furnaces for batch annealing in which coils are stacked beneath the bell and heated in a non-reactive atmosphere. Annealed SRC pipe and tube can be distinguished by the matte surface finish and lesser stiffness compared to as-drawn tubing. Otherwise, annealed and non-annealed SRC pipe and tube are of the same product quality and exhibit the same performance characteristics when in contact with fluids.

Surface cleaning removes any remaining drawing lubricants or other contaminants. Outer surfaces can be coated for corrosion protection or insulation and are marked or color-coded for product identification. Attachments are also added to the ends, depending on the requirements of industry standards or customer specifications.

The number and extent of finishing processes typically varies between SRC pipe and tube for plumbing versus industrial applications. The finishing process is extremely important for the vast majority of industrial tubing, since the latter undergoes *** than does plumbing tubing.[31]

---

[29] Swaged ends are deformed so the copper tube can mate with another coper tube. Flared ends are flared to connect with a fitting. Expanded ends are expanded to permit connection with another tube or fixture. Crimped ends have been closed by crimping. Petitioner's postconference brief, p. II-3.

[30] Petitioner's postconference brief, p. II-2.

[31] *Seamless Refined Copper Pipe and Tube from China and Mexico, Investigation Nos. 731-TA-1174-1175 (Review)*, USITC Publication 4650, November 2016, p. I-23.

Domestic like product issues

No issues with respect to domestic like product have been raised in this investigation. In the preliminary phase of the investigation, the petitioner proposed that the Commission define a single domestic like product consisting of all SRC pipe and tube corresponding to the investigation's scope.[32] The Commission defined a single domestic like product consisting of SRC pipe and tube in its preliminary phase determinations.[33] No party submitted comments for the draft questionnaires for the final phase requesting data collection related to domestic like product issues. The petitioner argued in its prehearing brief that the Commission should continue to find a single domestic like product coextensive with the scope.[34]

[32] Petitioner's postconference brief, pp. I-7—I-9.

[33] *Seamless Refined Copper Pipe and Tube from Vietnam, Inv. No. 731-TA-1528 (Preliminary)*, USITC Publication 5108, August 2020, p. 9.

[34] Petitioner's prehearing brief, p. 6.

Part II: Conditions of competition in the U.S. market

U.S. market characteristics

SRC pipe and tube are used in plumbing and commercial applications that generally involve fluids under pressure for conveyance or for thermal transfer. Conveyance applications use plumbing pipe and tube and include distribution systems for water and other liquids and gases. Thermal applications include heating systems, commercial refrigeration systems, and air-conditioning systems and use commercial (or "industrial") pipe and tube.[1] SRC pipe and tube are made to American Society for Testing and Materials ("ASTM") standards or original equipment manufacturers ("OEM") specifications.

According to the petitioner, there are distinct channels of distribution and price setting methods for plumbing and commercial SRC pipe and tube. Plumbing applications meet ASTM standards for chemistry, outside diameter, wall thickness, strength, hardness, cleanliness, and roundness.[2] Plumbing pipe and tube are typically sold to distributors, wholesalers, or retailers, with some sales directly to OEMs, and are sold on the spot market with a set price list, discussed in Part V, and a "multiplier."[3]

Commercial SRC pipe and tube are made to ASTM standards as well as OEM specifications and include grooves, ridges, fins, or gills designed to enhance the efficiency of thermal transfer. OEMs specify custom dimensions, tempers, and packaging. Commercial SRC pipe and tube are typically sold directly to OEMs, with some small sales to distributors, and as discussed in further detail in Part V are typically sold based on set prices agreed upon in annual contracts.[4]

Regardless of application, SRC pipe and tube are sold in diameters ranging from 0.04 inches to 12 inches. SRC pipe and tube can be sold in straight lengths or coiled (either coiled onto spools or without spools).[5] In addition, some purchasers require SRC pipe and tube for specialty applications such as "ice makers, refrigerated cases, kitchen and bath fixtures" as well

[1] Petition, p. 7.
[2] Petition, p. 7.
[3] Statement of Devin Malone, Mueller, p. 2.
[4] See Petition, pp. 7-8, and statement of Devin Malone, Mueller, p. 2.
[5] Petition, p. 8.

as other applications such as "electrical conduit, compressed air, instrumentation, and decorative products."[6]

The U.S. market is supplied by U.S. producers as well as importers of SRC pipe and tube from Vietnam and from nonsubject sources such as Canada, Korea, Mexico, Thailand, and Greece.[7] SRC pipe and tube from China and Mexico are subject to antidumping duty orders, which were continued in December 2016.[8] According to petitioner, there is structural oversupply in the U.S. market.[9]

Apparent U.S. consumption of SRC pipe and tube decreased during 2018-20. Overall, apparent U.S. consumption of 647.4 million pounds in 2020 was 4.1 percent lower than in 2018. Apparent U.S. consumption decreased during 2018-19 and 2019-20 by 2.3 and 1.8 percent, respectively.

U.S. purchasers

The Commission received 23 usable questionnaire responses from firms that reported having purchased SRC pipe and tube since 2018.[10] Of the 23 responding purchasers, 20 purchased the domestic SRC pipe and tube, 13 purchased imports of the subject merchandise from Vietnam, and 12 purchased imports of SRC pipe and tube from other sources. Twelve of the responding purchasers are distributors, eight are Industrial HVAC manufacturers, and five use the SRC pipe and tube for manufacturing of plumbing units. *** submitted both U.S. producers' and purchasers' questionnaires.

[6] Statement of Devin Malone, Mueller, pp. 2-3.

[7] Four U.S. producers directly import SRC pipe and tube, although none import from Vietnam; two U.S. producers reported purchases of SRC pipe and tube from Vietnam.

[8] *Seamless Refined Copper Pipe and Tube from China and Mexico*, *Inv. Nos. 731-TA-1174-1175 (Review),* USITC Publication 4650, December 3, 2016.

[9] Petitioner's postconference brief, p. I-13.

[10] The following firms provided purchaser questionnaire responses: ***.

Most responding U.S. purchasers are located throughout the contiguous United States, although one firm is located in ***. The largest purchasers of SRC pipe and tube include ***.

Channels of distribution

Table II-1 presents U.S. producers' and importers' U.S. shipments by channel of distribution. U.S. producers and responding importers of SRC pipe and tube from nonsubject sources reported selling to both distributors and end users; in contrast, responding U.S. importers of SRC pipe and tube from Vietnam reported selling primarily to distributors.[11]

Table II-1
SRC pipe and tube: Share of U.S. producers' and importers' shipments by channel of distribution within source, 2018-20

Shares in percent

Source	Channel	2018	2019	2020
United States	Distributors	***	***	***
United States	End users	***	***	***
Vietnam	Distributors	***	***	***
Vietnam	End users	***	***	***
Nonsubject	Distributors	***	***	***
Nonsubject	End users	***	***	***
All imports	Distributors	***	***	***
All imports	End users	***	***	***

Note: On a quarterly basis, U.S. producers' shipments to distributors ranged from *** to ***, importers' shipments to distributors of product from Vietnam ranged from *** to ***, and importers' shipments to distributors of product from nonsubject countries ranged from *** to ***. U.S. producers' shipments to end users ranged from *** to ***, importers' shipments to end users of product from Vietnam ranged from *** to ***, and importers' shipments to end users of product from nonsubject countries ranged from *** to ***. See appendix D for quarterly data on U.S. producers' and U.S. importers' shipments of SRC pipe and tube to distributors, to end users, and to both channels, as derived from questionnaire responses.

Source: Compiled from data submitted in response to Commission questionnaires.

[11] In its responses to questions from the Commission, petitioner argued that ***. Petitioner's Responses to Questions from the Commission, pp 11-12. Staff has followed up with ***. See email from ***.

Geographic distribution

U.S. producers reported selling SRC pipe and tube to all regions in the contiguous United States, as seen in table II-2. Overall, importers reported selling to all regions as well, but a majority of firms reported selling to the Midwest and Southeast only. *** reported shipments to all regions. For U.S. producers, 11.6 percent of sales were within 100 miles of their production facility, 70.8 percent were between 101 and 1,000 miles, and 17.5 percent were over 1,000 miles. Importers sold 7.6 percent within 100 miles of their U.S. point of shipment, 73.5 percent between 101 and 1,000 miles, and 19.0 percent over 1,000 miles.

Table II-2
SRC pipe and tube: Count of U.S. producers' and U.S. importers' geographic markets, 2018-20

Region	U.S. producers	Vietnam
Northeast	6	3
Midwest	6	7
Southeast	6	8
Central Southwest	6	5
Mountains	6	3
Pacific Coast	6	5
Other	4	2
All regions (except Other)	6	2
Reporting firms	6	12

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Other U.S. markets include AK, HI, PR, and VI.

Supply and demand considerations

U.S. supply

Table II-3 provides a summary of the supply factors regarding SRC pipe and tube from U.S. producers and Vietnamese producers in 2018 and 2020. Capacity increased in Vietnam, while slightly decreasing in the United States. Capacity utilization rates and inventories decreased much more for Vietnamese producers than for U.S. producers. Almost all of the U.S.-produced SRC pipe and tube was sold domestically, while the responding Vietnamese producer indicated that sold *** of its SRC pipe and tube in its home market. The majority of U.S. producers indicated they were unable to shift production to other products, while the responding Vietnamese producer reported ***.

Table II-3
SRC pipe and tube: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Quantity in 1,000 pounds; shares and ratio in percent

Factor	Measure	United States	Vietnam
Capacity 2018	Quantity	945,281	***
Capacity 2020	Quantity	912,941	***
Capacity utilization 2018	Ratio	60.5	***
Capacity utilization 2020	Ratio	56.0	***
Ending inventories to total shipments 2018	Ratio	***	***
Ending inventories to total shipments 2020	Ratio	***	***
Home market shipments 2020	Share	***	***
Non-US export market shipments 2020	Share	***	***
Ability to shift production	Count	1 of 6	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Responding U.S. producers accounted for the vast majority of U.S. production of SRC pipe and tube in 2020. ***. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Part I, “Summary Data and Data Sources.”

Domestic production

Based on available information, U.S. producers of SRC pipe and tube have the ability to respond to changes in demand with large changes in the quantity of shipments of U.S.-produced SRC pipe and tube to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity and inventories. Factors mitigating responsiveness of supply include the limited ability to shift shipments from alternate markets or inventories and the limited ability to shift production to or from alternate products.

U.S. producers reported that capacity decreased by 3.4 percent, capacity utilization decreased by 4.5 percentage points, and inventories increased by 16.3 percent from 2018 to 2020. Major export markets include ***. Most firms indicated they are unable to produce other products on their current equipment, but ***. Two of six producers reported being able to produce other products on the same equipment as SRC pipe and tube.

Subject imports from Vietnam

Based on available information, producers of SRC pipe and tube from Vietnam have the ability to respond to changes in demand with large changes in the quantity of shipments of SRC pipe and tube to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity and ability to shift shipments from alternate markets. Factors mitigating responsiveness of supply include a limited ability to shift shipments from inventories and a limited ability to shift production to or from alternate products.

*** reported that its capacity increased by *** percent, its capacity utilization decreased by *** percentage points, and its inventories decreased by *** percent from 2018 to 2020. ***.

Imports from nonsubject sources

Imports from nonsubject sources accounted for 59.9 percent of total U.S. imports in 2020. The largest nonsubject sources of SRC pipe and tube in 2020, in descending order, were Canada, Korea, Mexico, Thailand, and Greece. Combined, these countries accounted for 45.5 percent of imports in 2020.

Supply constraints

Fifteen of 21 responding U.S. purchasers reported not having experienced any supply constraints since January 1, 2018. However, seven did. *** indicated issues with suppliers supplying product, *** experienced difficulties finding certain specifications, while *** indicated a raw material shortage caused supply constraints. *** indicated significant equipment breakdowns in the second half of 2018, ***. ***.

New suppliers

Seventeen of 21 purchasers indicated that no new suppliers entered the U.S. market since January 1, 2018. However, five did report new suppliers. *** noted Bison Metals; *** noted KME; and *** noted BMP, Master J, IGAS, Smart Electric, Sinochem-ICOOL, P-Tubes, Ebrille USA; *** noted a firm in Thailand opening a facility in Texas, and *** did not specify.

U.S. demand

Based on available information, the overall demand for SRC pipe and tube is likely to experience moderate changes in response to changes in price. The main contributing factors are the small cost share of SRC pipe and tube in most of its end-use products in contrast with some availability of substitute products.

End uses and cost share

U.S. demand for SRC pipe and tube depends on the demand for U.S.-produced downstream products. Reported end uses include HVAC units, plumbing, refrigeration, and other industrial applications. Four of 12 responding U.S. purchasers indicated that demand for their end use products fluctuated since January 1, 2018, 4 indicated that it increased, 3 indicated that demand for their end use products did not change, and 1 indicated that demand for its end use products decreased.

SRC pipe and tube accounts for a large share of the cost for component parts such as coils, condenser tube, or electrical tube, and a small share of the cost for most of the end-use products like HVAC and refrigeration units. Reported cost shares for some end uses were as follows: 7 percent for a residential air conditioner, 10 percent for a commercial air conditioner,

15 percent for an industrial air conditioner,[12] and 100 percent for welded components and compression connectors.

Business cycles

Five of 6 U.S. producers, 10 of 21 importers, and 12 of 22 purchasers indicated that the market was subject to business cycles or conditions of competition. The most commonly cited cycle was seasonal demand for SRC pipe and tube and its end-use products that typically declines in the fourth quarter largely due to the onset of colder weather.

The use of aluminum tubing as a substitute was noted as a condition of competition specific to the SRC pipe and tube by ***. Purchasers *** and *** noted the COVID-19 pandemic as a change in conditions since 2018.

Demand trends

The petitioner stated that demand for SRC pipe and tube is based on activity in the construction sector.[13] A recession started in February 2020, according to the National Bureau of Economic Research, which corresponded with a drop in construction spending by 5.0 percent into May 2020. Construction spending has since rebounded, increasing by 12.1 percent to 1.5 trillion dollars from January 2018 to March 2021, as seen in table II-4 and figure II-1. The petitioner noted that construction spending can be driven both by increased real activity and increased costs. It added that trends in apparent U.S. consumption (showing a small decrease) are more in line with its impressions of market demand than increased construction spending.[14]

[12] Industrial HVACs may be required for larger and more power intensive end uses relative to commercial HVACs.

[13] Statement of Devin Malone, Mueller, p. 4.

[14] Petitioner's Responses to Questions from the Commission, pp. 4-5.

Table II-4

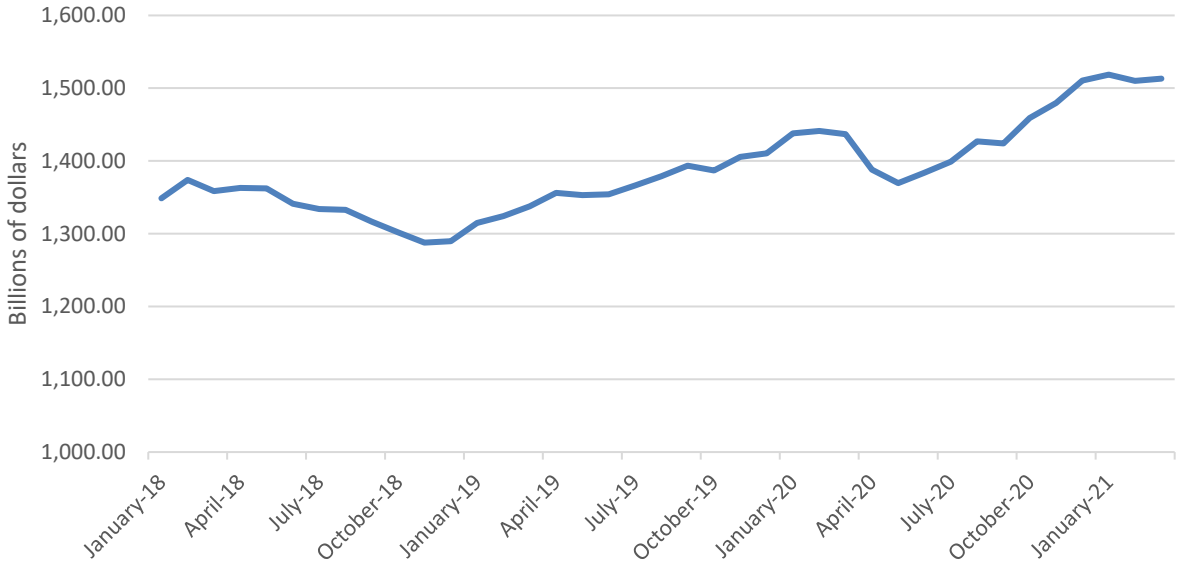
Value of construction put in place: Total construction spending, seasonally adjusted annual rate, January 2018 – March 2021

Millions of dollars

Period	Total construction spending
January 2018	1,348,653
February 2018	1,373,812
March 2018	1,358,387
April 2018	1,362,805
May 2018	1,362,246
June 2018	1,341,076
July 2018	1,333,714
August 2018	1,332,656
September 2018	1,316,355
October 2018	1,301,777
November 2018	1,287,767
December 2018	1,289,604
January 2019	1,314,616
February 2019	1,324,229
March 2019	1,337,504
April 2019	1,356,014
May 2019	1,352,895
June 2019	1,354,080
July 2019	1,366,042
August 2019	1,378,956
September 2019	1,393,304
October 2019	1,386,826
November 2019	1,405,510
December 2019	1,410,267
January 2020	1,437,719
February 2020	1,441,145
March 2020	1,436,727
April 2020	1,387,936
May 2020	1,369,363
June 2020	1,383,647
July 2020	1,398,952
August 2020	1,426,884
September 2020	1,423,963
October 2020	1,458,989
November 2020	1,479,555
December 2020	1,510,387
January 2021	1,518,707
February 2021	1,506,639
March 2021	1,521,014

Source: U.S. Census Bureau, retrieved from FRED, Federal Reserve Bank of St. Louis; https://fred.stlouisfed.org/series/TTLCONS, retrieved May 10, 2021

Figure II-1
Value of construction put in place: Total construction spending, seasonally adjusted annual rate, January 2018 – March 2021



Source: U.S. Census Bureau, retrieved from FRED, Federal Reserve Bank of St. Louis; https://fred.stlouisfed.org/series/TTLCONS, retrieved May 10, 2021

Firms reported a wide variety of trends in U.S. demand for SRC pipe and tube since January 1, 2018 (table II-5). Although there was a relatively mixed perspective on the state of demand during 2018-20, most descriptions noted COVID as a contributing factor.

Table II-5
SRC pipe and tube: Count of firms' responses regarding overall domestic and foreign demand

Market	Firm type	Increase	No change	Decrease	Fluctuate
Domestic demand	U.S. producers	1	1	2	2
Domestic demand	Importers	3	3	6	5
Domestic demand	Purchasers	8	5	2	5
Foreign demand	U.S. producers	0	1	2	2
Foreign demand	Importers	0	4	2	3
Foreign demand	Purchasers	4	5	2	3
Demand for end use products	Purchasers	4	3	1	4

Source: Compiled from data submitted in response to Commission questionnaires.

Substitute products

Most U.S. producers (4 of 6) reported there are substitutes for SRC pipe and tubes, while the majority of U.S. importers (16 of 20) and purchasers (14 of 22) indicated there are no substitutes. Substitutes for SRC pipe and tube consist of plastic (PEX, CPVC, and PVC), steel pipe, and aluminum pipe and tubing, depending on the purpose for the SRC pipe and tube. The

petitioner indicated that plastic can be substituted for SRC pipe and tube in plumbing and construction applications, and aluminum can be substituted in HVAC units, but characterized both as limited and "inferior" for SLC pipe and tube.[15]

Substitutability issues

The degree of substitution between domestic and imported SRC pipe and tube depends upon such factors as relative prices, quality (e.g., grade standards, defect rates, etc.), and conditions of sale (e.g., price discounts/rebates, lead times between order and delivery dates, reliability of supply, product services, etc.). Based on available data, staff believes that there is a high degree of substitutability between domestically produced SRC pipe and tube and SRC pipe and tube imported from Vietnam. U.S. producers, importers, and purchasers (see table II-11 below) reported that domestically produced SRC pipe and tube and SRC pipe and tube imported from Vietnam always or frequently can be used interchangeably.

Lead times

SRC pipe and tube is primarily sold from inventory. U.S. producers reported that 54.0 percent of their commercial shipments were shipped from inventory, with lead times averaging 9.7 days. The remaining 46.0 percent of their commercial shipments were produced-to-order, with lead times averaging 24.5 days. Importers reported that 45.5 percent of their commercial shipments came from U.S. inventories, with lead times averaging 18.0 days, while 11.6 percent came from foreign inventories, with lead times averaging 100.0 days. The remaining 42.9 percent of their commercial shipments were produced to order, with lead times averaging 66.8 days.[16]

Knowledge of country sources

Twenty-one purchasers indicated they had marketing/pricing knowledge of domestically produced SRC pipe and tube, 10 of Vietnamese SRC pipe and tube, and 10 of nonsubject countries' SRC pipe and tube.[17]

As shown in table II-6, a plurality of purchasers always make purchasing decisions based on producer or country of origin, while their customers predominately never make purchasing

---

[15] Petitioner's postconference brief, p. II-4, and statement of Devin Malone, p. 5.

[16] The importers responding for shipments from foreign inventories were not the same as those responding for shipments produced to order.

[17] Nonsubject countries mentioned include Canada, Germany, Greece, Italy, Malaysia, Mexico, Korea, Thailand, and Turkey.

decisions based on those factors. Of the 10 purchasers that reported that they always make decisions based the manufacturer, 2 firms cited quality/service/product standards. Another firm cited a requirement for producer approval.

Table II-6
SRC pipe and tube: Count of purchasing decisions by purchaser or their customer, based on producer and country of origin

Number of purchasers reporting

Firm making decision	Decision based on	Always	Usually	Sometimes	Never
Purchaser	Producer	10	1	4	7
Customer	Producer	0	3	7	11
Purchaser	Country	9	2	4	7
Customer	Country	0	5	7	9

Source: Compiled from data submitted in response to Commission questionnaires.

Factors affecting purchasing decisions

The most often cited top three factors firms consider in their purchasing decisions for SRC pipe and tube were price/cost (20 firms), quality (15 firms), and availability/supply (12 firms) as shown in table II-7. Quality was the most frequently cited first-most important factor (cited by 11 firms), followed by price/cost (5 firms); price/cost was the most frequently reported second-most important factor (10 firms); and price/cost and availability/supply were also the most frequently reported third-most important factor (5 firms each).

Table II-7
SRC pipe and tube: Count of ranking of factors used in purchasing decisions as reported by U.S. purchasers, by factor

Number of purchasers reporting

Factor	First	Second	Third	Total
Price / Cost	5	10	5	20
Quality	11	2	2	15
Availability / Supply	1	6	5	12
All other factors	5	3	8	NA

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Other factors include lead time (4 purchasers), supplier capabilities (4), terms of credit (1), service (1), and location (1).

The majority of purchasers (14 of 22) reported that they always or usually purchase the lowest-priced product. The remaining eight purchasers reported that they sometimes purchase the lowest-priced product.

Importance of specified purchase factors

Purchasers were asked to rate the importance of 15 factors in their purchasing decisions (table II-8). The factors rated as very important by the most purchasers were price (22 firms), availability (21), product consistency and quality meets industry standards (20 each), and reliability of supply (19).

Table II-8
SRC pipe and tube: Count of importance of purchase factors, as reported by U.S. purchasers, by factor

Number of purchasers reporting

Factor	Very important	Somewhat important	Not important
Availability	21	1	0
Delivery terms	15	7	0
Delivery time	16	6	0
Discounts offered	10	7	5
Minimum quantity requirements	4	12	5
Packaging	7	9	6
Payment terms	14	6	2
Price	22	0	0
Product consistency	20	3	0
Product range	7	13	2
Quality meets industry standards	20	2	0
Quality exceeds industry standards	11	9	2
Reliability of supply	19	3	0
Technical support/service	11	8	3
U.S. transportation costs	10	6	4

Source: Compiled from data submitted in response to Commission questionnaires.

Supplier certification

Twelve of 21 responding purchasers indicated that they required their suppliers to become certified or qualified to sell SRC pipe and tube to their firm, while nine reported that they did not. Purchasers reported that the time to qualify a new supplier ranged from 1 to 180 days. Eighteen purchasers reported that no domestic or foreign supplier had failed in its attempt to qualify SRC pipe and tube or had lost its approved status since 2018. However, three did. *** described an Indian firm failing due to low conductivity readings on their product, *** listed firms in Brazil, Vietnam, and Oklahoma that failed to meet specification requirements, while *** noted that an unspecified firm failed to demonstrate a required level of performance.

Changes in purchasing

Purchasers were asked about changes in their purchasing patterns from different sources since 2018 (table II-9); reasons reported for changes in sourcing included supply/availability, prices/cost, and job specific requirements. For example, *** reported decreased purchases of U.S. product and increased purchases of Vietnamese product because of price or cost reasons. *** stated that decreased purchases of U.S. product and increased purchases of nonsubject-country product for availability reasons. Eight purchasers reported changed purchasing patterns due to changed (usually lower) demand for their own end-use products. *** reported decreased purchases of Vietnamese product due to this investigation.

In response to a separate question, fifteen purchasers reported that they had not changed suppliers since January 1, 2018. Seven did. *** stated that it stopped purchasing from ***. *** reported that it stopped purchasing from *** because *** *** reported that it stopped purchasing from ***. *** indicated that it switched from U.S. to Vietnamese product ***. Two other purchasers indicated fluctuating purchases from ***.

Table II-9
SRC pipe and tube: Count of changes in purchase patterns from U.S., subject, and nonsubject countries

Number of purchasers reporting

Source of purchases	Decreased	Increased	Constant	Fluctuated	Did not purchase
United States	5	4	7	5	1
Vietnam	3	5	1	2	10
All other sources	1	4	0	5	10
Sources unknown	0	1	1	2	11

Source: Compiled from data submitted in response to Commission questionnaires.

Importance of purchasing domestic product

Eighteen of 23 responding purchasers reported that most or all of their purchases did not require purchasing U.S.-produced product. Four reported that domestic product was required by law (for 0.1 to 49.9 percent of their purchases), 7 reported that it was required by their customers (for 0.1 to 100.0 percent of their purchases), and 3 reported other preferences for domestic product. Reasons cited for preferring domestic product included customer defined/specification of a product difficult or unable to be found at a foreign mill. The

petitioner stated that it believes that total U.S. purchases subject to Buy America or Buy American Act regulations are "very small," less than *** percent of all U.S. purchases of SRC pipe and tube.[18]

Comparisons of domestic products, subject imports, and nonsubject imports

Purchasers were asked a number of questions comparing SRC pipe and tube produced in the United States, Vietnam, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 15 factors (table II-9) for which they were asked to rate the importance.

Most purchasers reported that U.S., Vietnamese, and nonsubject SRC pipe and tube were comparable on 13 factors (table II-10). The biggest varying factor between the United States and Vietnam was price, for which U.S. product was mostly considered inferior, and delivery time, for which U.S.-produced SLC pipe and tube was mostly considered superior. Similar dynamics were reported in comparisons of domestically produced product with nonsubject countries with respect to delivery time and price. Most factors were considered comparable between Vietnam and nonsubject countries.

Table II-10
SRC pipe and tube: Count of purchasers' responses comparing U.S.-produced and imported product

Number of purchasers reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	United States vs. Vietnam	4	9	1
Delivery terms	United States vs. Vietnam	3	9	2
Delivery time	United States vs. Vietnam	9	4	1
Discounts offered	United States vs. Vietnam	1	10	3
Minimum quantity requirements	United States vs. Vietnam	2	11	1
Packaging	United States vs. Vietnam	1	12	1
Payment terms	United States vs. Vietnam	3	7	4
Price	United States vs. Vietnam	1	3	10
Product consistency	United States vs. Vietnam	2	10	2
Product range	United States vs. Vietnam	2	12	0
Quality meets industry standards	United States vs. Vietnam	2	11	1
Quality exceeds industry standards	United States vs. Vietnam	2	11	1
Reliability of supply	United States vs. Vietnam	4	9	0
Technical support/service	United States vs. Vietnam	4	10	0
U.S. transportation costs	United States vs. Vietnam	5	7	2

Table continued on next page.

[18] Petitioner's Responses to Questions from the Commission, p. 36.

Table II-10 Continued
SRC pipe and tube: Count of purchasers' responses comparing U.S.-produced and imported product

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	United States vs. Other	5	9	0
Delivery terms	United States vs. Other	5	7	2
Delivery time	United States vs. Other	8	5	1
Discounts offered	United States vs. Other	1	10	3
Minimum quantity requirements	United States vs. Other	2	12	0
Packaging	United States vs. Other	4	10	0
Payment terms	United States vs. Other	3	8	2
Price	United States vs. Other	3	3	8
Product consistency	United States vs. Other	4	9	1
Product range	United States vs. Other	4	8	2
Quality meets industry standards	United States vs. Other	3	10	1
Quality exceeds industry standards	United States vs. Other	4	9	1
Reliability of supply	United States vs. Other	6	7	1
Technical support/service	United States vs. Other	6	8	0
U.S. transportation costs	United States vs. Other	6	7	1

Table continued.

Table II-10 Continued
SRC pipe and tube: Count of purchasers' responses comparing subject and nonsubject imported product

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	Vietnam vs. Other	2	8	0
Delivery terms	Vietnam vs. Other	3	7	0
Delivery time	Vietnam vs. Other	1	8	1
Discounts offered	Vietnam vs. Other	2	7	0
Minimum quantity requirements	Vietnam vs. Other	1	9	0
Packaging	Vietnam vs. Other	1	9	0
Payment terms	Vietnam vs. Other	3	6	1
Price	Vietnam vs. Other	4	6	0
Product consistency	Vietnam vs. Other	1	9	0
Product range	Vietnam vs. Other	1	8	1
Quality meets industry standards	Vietnam vs. Other	1	9	0
Quality exceeds industry standards	Vietnam vs. Other	1	9	0
Reliability of supply	Vietnam vs. Other	1	9	0
Technical support/service	Vietnam vs. Other	1	8	1
U.S. transportation costs	Vietnam vs. Other	1	8	1

Source: Compiled from data submitted in response to Commission questionnaires.

Note: A rating of superior means that price/U.S. transportation cost is generally lower. For example, if a firm reported "U.S. superior," it meant that the U.S. product was generally priced lower than the imported product.

Comparison of U.S.-produced and imported SRC pipe and tube

In order to determine whether U.S.-produced SRC pipe and tube can generally be used in the same applications as imports from Vietnam, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in table II-11, all responding U.S. producers and purchasers and all but three importers indicated that SRC pipe and tube from the United States and Vietnam are always or frequently interchangeable. Almost all firms indicated that domestic and Vietnamese product were always or frequently interchangeable with nonsubject product as well.

Table II-11
SRC pipe and tube: Count of U.S. producers reporting the interchangeability between SRC pipe and tube produced in the United States and in other countries, by country pair and firm type

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. Vietnam	4	1	0	0
United States vs. Other	4	2	0	0
Vietnam vs. Other	4	1	0	0

Table continued on next page.

Table II-11 Continued
SRC pipe and tube: Count of U.S. importers reporting the interchangeability between SRC pipe and tube produced in the United States and in other countries, by country pair and firm type

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. Vietnam	9	7	2	1
United States vs. Other	9	7	1	2
Vietnam vs. Other	7	4	1	1

Table continued.

Table II-11 Continued
SRC pipe and tube: Count of U.S. purchasers reporting the interchangeability between SRC pipe and tube produced in the United States and in other countries, by country pair and firm type

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. Vietnam	9	7	0	0
United States vs. Other	5	8	1	0
Vietnam vs. Other	3	7	0	0

Source: Compiled from data submitted in response to Commission questionnaires.

As can be seen from table II-12, all responding purchasers reported that domestically produced product always or usually met minimum quality specifications. Twelve of 13 responding purchasers reported that the Vietnamese SRC pipe and tube always or usually met minimum quality specifications, while one indicated they sometimes met minimum standards.

Table II-12
SRC pipe and tube: Count of firms' responses regarding suppliers' ability to meet minimum quality specifications, by source

Number of firms reporting

Source of purchases	Always	Usually	Sometimes	Rarely or never
United States	11	10	0	0
Vietnam	10	2	1	0
All other sources	4	3	2	0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Purchasers were asked how often domestically produced or imported SRC pipe and tube meets minimum quality specifications for their own or their customers' uses.

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of SRC pipe and tube from the United States, subject, or nonsubject countries. As seen in table II-13, U.S. producers mostly reported that sometimes there are significant factors other than price between U.S. and Vietnamese product; importers mostly noted there are sometimes such differences, while purchasers mostly noted there are always differences.

Table II-13
SRC pipe and tube: Count of U.S. producers reporting the significance of differences other than price between SRC pipe and tube produced in the United States and in other countries, by country pair

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. Vietnam	0	0	4	1
United States vs. Other	0	1	4	1
Vietnam vs. Other	0	0	4	0

Table continued.

Table II-13 Continued
SRC pipe and tube: Count of importers reporting the significance of differences other than price between SRC pipe and tube produced in the United States and in other countries, by country pair

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. Vietnam	3	2	12	2
United States vs. Other	5	2	10	2
Vietnam vs. Other	1	1	8	3

Table continued on next page.

Table II-13 Continued
SRC pipe and tube: Count of U.S. purchasers reporting the significance of differences other than price between SRC pipe and tube produced in the United States and in other countries, by country pair

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. Vietnam	10	2	3	0
United States vs. Other	7	2	5	0
Vietnam vs. Other	5	3	4	0

Source: Compiled from data submitted in response to Commission questionnaires.

Importers and purchasers indicated that non-price factors including quality, availability, delivery terms, and specific/unique design features were important factors in comparing SRC pipe and tube from the United States with those from Vietnam. *** noted that the unique capabilities of products they import from Vietnam are the biggest factor for their customers, not price. *** included technical support with availability and quality as important factors. *** noted an internal grooved tube was necessary to meet customers' requirements. *** noted Buy America requirements are sometimes requirements. *** indicated that the quality of U.S.-produced SRC pipe and tube is not sufficient nor equivalent to foreign produced SRC pipe and tube. *** noted supplier resilience and environmental and social responsibility are important factors in differentiating between SRC pipe and tube products.

Elasticity estimates

This section discusses elasticity estimates; parties were encouraged to comment on these estimates in their prehearing or posthearing briefs. None did so.

U.S. supply elasticity

The domestic supply elasticity for SRC pipe and tube measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of SRC pipe and tube. The elasticity of domestic supply depends on several factors including the level of excess capacity, the ease with which producers can alter capacity, producers' ability to shift to production of other products, the existence of inventories, and the availability of alternate markets for U.S.-produced SRC pipe and tube. Analysis of these factors above indicates that the U.S. industry has the ability to increase shipments to the U.S. market; an estimate in the range of 4 to 8 is suggested.

U.S. demand elasticity

The U.S. demand elasticity for SRC pipe and tube measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of SRC pipe and tube. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the SRC pipe and tube in the production of any downstream products. Based on the available information, the aggregate demand for SRC pipe and tube is likely to be moderately inelastic; a range of -0.5 to -1.0 is suggested.

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.[19] Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). Based on available information, the elasticity of substitution between U.S.-produced SRC pipe and tube and imported SRC pipe and tube is likely to be in the range of 3 to 5.

[19] The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the subject imports and the domestic like products to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the subject products (or vice versa) when prices change.

Part III: U.S. producers' production, shipments, and employment

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the dumping margins was presented in *Part I* of this report and information on the volume and pricing of imports of the subject merchandise is presented in *Part IV* and *Part V*. Information on the other factors specified is presented in this section and/or *Part VI* and (except as noted) is based on the questionnaire responses of six firms that are believed to account for the vast majority of U.S. production of SRC pipe and tube.[1]

U.S. producers

The Commission issued a U.S. producer questionnaire to 13 firms based on information contained in the petition and obtained through staff research.[2] Six firms provided usable data on their operations. As noted above, staff believes that these responses represent the vast majority of U.S. production of SRC pipe and tube.

Table III-1 lists U.S. producers of SRC pipe and tube, their production locations, positions on the petition, and shares of total production.

[1] Total production reported in the six U.S. producers' questionnaire responses was 545.6 million pounds in 2019, which exceeds petitioner's estimate of *** pounds of total U.S. production in 2019 as provided in its petition (Petition, p. 4).

[2] One firm, Precision Tube Company, is a subsidiary of Mueller and was included in Mueller's response. Another firm, Elkhart Products Corporation, sent an email to staff indicating that it ***.

Two other firms believed to produce SRC pipe and tube in the United States, Drawn Metal Tube Company and Bison Metals Technologies, did not respond to staff's multiple requests for responses. *** submitted certifications that they were not U.S. producers of SRC pipe and tube in the preliminary phase of this investigation.

Table III-1
SRC pipe and tube: U.S. producers, their position on the petition, location of production, and share of reported production, 2020

Firm	Position on petition	Production location(s)	Share of production (percent)
Cambridge	***	Reading, PA Fayetteville, NC Jacksonville, TX	***
Cerro	Petitioner	Sauget, IL Shelbina, MO Vinita Park, MO	***
GD Copper	***	Pine Hill, AL	***
H&H	***	Vanderbilt, MI	***
Mueller	Petitioner	Fulton, MS Cedar City, UT New Market, VA Wynne, AR North Wales, PA	***
Wieland	***	Pine Hall, NC	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-2 presents information on U.S. producers' ownership, related and/or affiliated firms.

Table III-2
SRC pipe and tube: U.S. producers' ownership, related and/or affiliated firms

Reporting firm	Relationship type and related firm	Details of relationship
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

Table continued on next page.

Table III-2--Continued
SRC pipe and tube: U.S. producers' ownership, related and/or affiliated firms

Reporting firm	Relationship type and related firm	Details of relationship
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

As indicated in table III-2, no U.S. producer is related to foreign producers of SRC pipe and tube from Vietnam, nor is any related to U.S. importers of SRC pipe and tube from Vietnam. However, as discussed in greater detail below, four U.S. producers directly import SRC pipe and tube, although none import from subject sources; two U.S. producers reported purchases of SRC pipe and tube from subject sources.

Table III-3 presents U.S. producers' reported changes in operations since January 1, 2018.

Table III-3
SRC pipe and tube: U.S. producers' reported changes in operations, since January 1, 2018

Item	Firm name and accompanying narrative response
Plant openings	***
Plant openings	***
Plant closings	***
Plant closings	***
Relocations	***
Relocations	***
Expansions	***
Acquisitions	***
Acquisitions	***
Prolonged shutdowns or curtailments	***
Revised labor agreements	***
Revised labor agreements	***

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. production, capacity, and capacity utilization

Table III-4 and figure III-1 present U.S. producers' production, capacity, and capacity utilization. All three measures decreased continuously from 2018 to 2020, with capacity and production decreasing by 3.4 and 10.7 percent respectively and capacity utilization decreasing by 4.5 percentage points.[3] *** reported declining capacity from 2018 to 2020. ***

[3] The petitioner argues that worker absenteeism resulting from the COVID pandemic affected the productivity for certain reporting firms, but had no effect on capacity, the decrease of which it attributes to ***. Petitioner's responses to questions from the Commission, p. 2.

***.[4] Production fluctuated over the period across firms, but was lower for *** in 2020 than in 2018.

U.S. producers' aggregate reported capacity exceeded apparent U.S. consumption by 40.0 percent in 2018; by 43.1 percent in 2019; and by 41.0 percent in 2020. Producers provided additional detail on their capacity calculations and operating parameters. Mueller explained its capacity calculation by reporting ***. It reported that ***. Cerro reported operating ***, based on "***."[5]

GD Copper reported operating ***, while Cambridge reported operating ***, based on "***." H&H, ***, reported operating ***, while Wieland reported operating ***, based on "***."

[4] ***.

[5] ***.

Table III-4
SRC pipe and tube: U.S. producers' capacity by firm and period

Capacity in 1,000 pounds

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	945,281	943,619	912,941

Table continued.

Table III-4 Continued
SRC pipe and tube: U.S. producers' production by firm and period

Production in 1,000 pounds

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	572,347	545,557	511,389

Table continued.

Table III-4 Continued
SRC pipe and tube: U.S. producers' capacity utilization by firm and period

Capacity utilization ratios in percent

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	60.5	57.8	56.0

Table continued on next page.

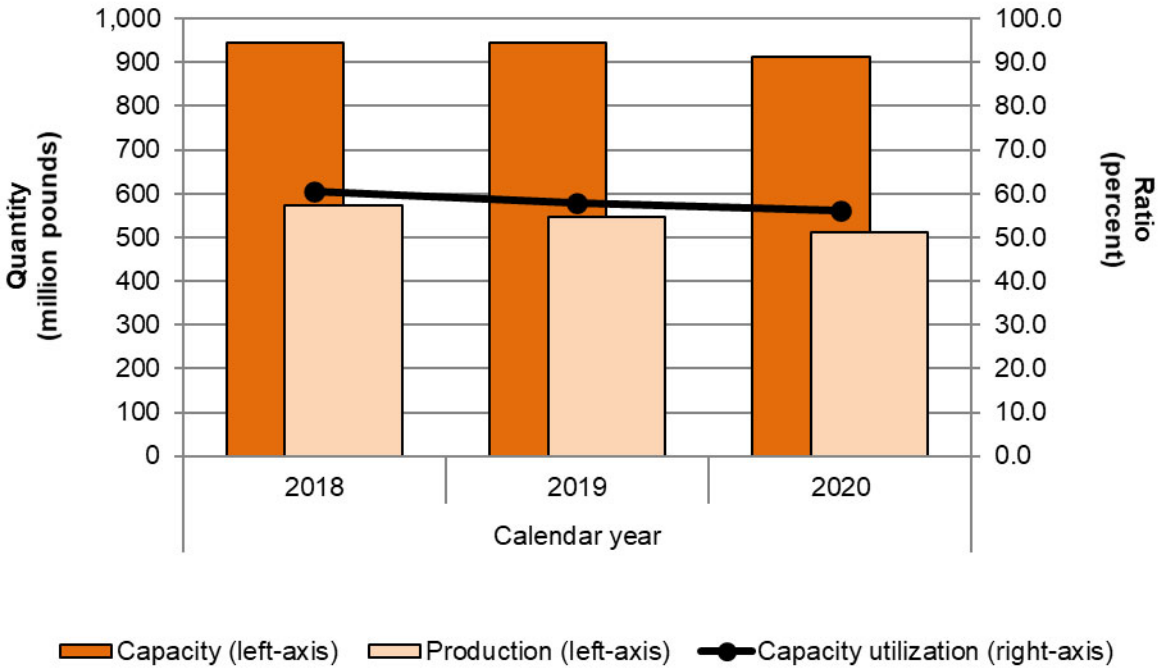
Table III-4 Continued
SRC pipe and tube: U.S. producers' share of production by firm and period

Share of production in percent

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Figure III-1
SRC pipe and tube: U.S. producers' capacity, production, and capacity utilization, by period



Source: Compiled from data submitted in response to Commission questionnaires.

Alternative products

As shown in table III-5, *** percent of products produced during 2020 by U.S. producers was SRC pipe and tube. No U.S. producer reported producing large diameter copper tubular products on shared equipment, and only *** reported production of other products on the same equipment used to make SRC pipe and tube; these products include ***.

Table III-5
SRC pipe and tube: U.S. producers' overall capacity and production on the same equipment as subject production, by period

Quantity in 1,000 pounds; shares and ratios in percent

Item	Measure	2018	2019	2020
Overall capacity	Quantity	945,281	943,619	912,941
SRC pipe and tube production	Quantity	572,347	545,557	511,389
Other production	Quantity	***	***	***
Total production	Quantity	***	***	***
Overall capacity utilization	Ratio	***	***	***
SRC pipe and tube production	Share	***	***	***
Other production	Share	***	***	***
Total production	Share	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. producers' U.S. shipments and exports

Table III-6 presents U.S. producers' U.S. shipments, export shipments, and total shipments. U.S. shipments and export shipments declined continuously from 2018 to 2020 (by 10.6 percent and *** percent by quantity, and by 15.1 percent and *** percent by value, respectively). Export shipment unit values were consistently higher than those for U.S. shipments, and both measures fluctuated but declined from 2018 to 2020. The share of total shipments by quantity accounted for by U.S. shipments consistently exceeded *** percent.

Table III-6
SRC pipe and tube: U.S. producers' U.S. shipments, export shipments, and total shipments, by period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per 1,000 pounds; Shares in percent

Item	Measure	2018	2019	2020
U.S. shipments	Quantity	545,367	526,869	487,480
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
U.S. shipments	Value	2,025,126	1,847,031	1,719,099
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***
U.S. shipments	Unit value	3,713	3,506	3,527
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
U.S. shipments	Share of quantity	***	***	***
Export shipments	Share of quantity	***	***	***
Total shipments	Share of quantity	100.0	100.0	100.0
U.S. shipments	Share of value	***	***	***
Export shipments	Share of value	***	***	***
Total shipments	Share of value	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-7 presents additional details on U.S. producers' U.S. shipments by subcategory. U.S. commercial shipments comprised at least *** percent of total shipments by quantity in each period, while internal consumption and transfers to related parties were between *** percent combined of the share of total shipments by quantity in any period. The vast majority of internal consumption was reported by ***, while *** reported transfers to related firms.

Levels of internal consumption and transfers are higher than the levels shown in the preliminary phase staff report due to *** and ***.[6]

[6] ***.

Table III-7
SRC pipe and tube: U.S. producers' U.S. shipments, export shipments, and total shipments, by period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per 1,000 pounds; Shares in percent

Item	Measure	2018	2019	2020
Commercial U.S. shipments	Quantity	***	***	***
Internal consumption	Quantity	***	***	***
Transfers to related firms	Quantity	***	***	***
U.S. shipments	Quantity	545,367	526,869	487,480
Commercial U.S. shipments	Value	***	***	***
Internal consumption	Value	***	***	***
Transfers to related firms	Value	***	***	***
U.S. shipments	Value	2,025,126	1,847,031	1,719,099
Commercial U.S. shipments	Unit value	***	***	***
Internal consumption	Unit value	***	***	***
Transfers to related firms	Unit value	***	***	***
U.S. shipments	Unit value	3,713	3,506	3,527
Commercial U.S. shipments	Share of quantity	***	***	***
Internal consumption	Share of quantity	***	***	***
Transfers to related firms	Share of quantity	***	***	***
U.S. shipments	Share of quantity	100.0	100.0	100.0
Commercial U.S. shipments	Share of value	***	***	***
Internal consumption	Share of value	***	***	***
Transfers to related firms	Share of value	***	***	***
U.S. shipments	Share of value	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. producers' inventories

Table III-8 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments**.** Inventories decreased by 0.6 percent from 2018 to 2019, before increasing by 17.0 percent from 2019 to 2020, driven by a *** percent increase in inventories reported by *** from 2019 to 2020 which offset reductions in inventory reported by *** in the same period. Inventories increased overall by 16.3 percent from 2018 to 2020. Consistent with higher inventory levels, the ratio of inventories to U.S. production and shipments, ***, exceeded 9 percent in 2020.[7]

[7] Inventory levels reported by *** may include purchased SRC pipe and tube, which the firm could not separate from its inventory of U.S. production.

Table III-8
SRC pipe and tube: U.S. producers' inventories, by period

Quantity in 1,000 pounds; inventory ratios in percent

Firm	2018	2019	2020
End-of-period inventory quantity	40,563	40,336	47,174
Inventory ratio to U.S. production	7.1	7.4	9.2
Inventory ratio to U.S. shipments	7.4	7.7	9.7
Inventory ratio to total shipments	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. producers' imports and purchases

U.S. producers' respective imports of SRC pipe and tube are presented in tables III-9 through III-13. No firm reported importing SRC pipe and tube from Vietnam. *** reported importing SRC pipe and tube from ***, *** reported importing from ***, *** reported importing from ***, and *** reported importing from ***. In aggregate, U.S. producers imported *** pounds of SRC pipe and tube in 2020, equivalent to *** percent of apparent U.S. consumption.

In addition, *** reported purchases from importers of SRC pipe and tube from Vietnam. *** reported purchases of imported SRC pipe and tube from Vietnam of *** pounds in 2019 and *** pounds in 2020. *** reported purchases of imported SRC pipe and tube from Vietnam of *** pounds in 2019 and *** pounds in 2020.[8] Additionally, *** purchased SRC pipe and tube from nonsubject sources.[9]

[8] ***.
***.
[9] ***.
***.

Table III-9
SRC pipe and tube: * U.S. production, U.S. imports, and ratio of import to production, by period**

Quantity in 1,000 pounds; ratios in percent

Item	Measure	2018	2019	2020
U.S. production	Quantity	***	***	***
Imports ***	Quantity	***	***	***
Imports *** to U.S. production	Ratio	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-10
SRC pipe and tube: * U.S. production, U.S. imports, and ratio of import to production, by period**

Quantity in 1,000 pounds; ratios in percent

Item	Measure	2018	2019	2020
U.S. production	Quantity	***	***	***
Imports from ***	Quantity	***	***	***
Imports *** to U.S. production	Ratio	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-11
SRC pipe and tube: * U.S. production, U.S. imports, and ratio of import to production, by period**

Quantity in 1,000 pounds; ratios in percent

Item	Measure	2018	2019	2020
U.S. production	Quantity	***	***	***
Imports ***	Quantity	***	***	***
Imports *** to U.S. production	Ratio	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-12
SRC pipe and tube: * U.S. production, U.S. imports, and ratio of import to production, by period**

Quantity in 1,000 pounds; ratios in percent

Item	Measure	2018	2019	2020
U.S. production	Quantity	***	***	***
Imports ***	Quantity	***	***	***
Imports *** to U.S. production	Ratio	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-13
SRC pipe and tube: U.S. producers' reasons for imports by firm

Item	Firm's narrative response
***	***
***	***
***	***
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. employment, wages, and productivity

Table III-14 shows U.S. producers' employment-related data. The number of PRWs and total wages paid increased from 2018 to 2019 (by 1.2 and 2.2 percent respectively) before declining from 2019 to 2020 (by 4.5 and 5.0 percent respectively) for a total period loss of 3.4 percent and 3.0 percent respectively. However, hourly wages increased by 15.5 percent from 2018 to 2020. Total hours worked and hours worked per PRW declined from 2018 to 2020, by 16.0 and 13.0 percent respectively, while productivity increased by 6.3 percent from 2018 to 2020. Asked for additional information concerning their firms' actual operating shifts and any changes over the period, no firm reported any notable changes in the number of shifts employed from 2018 to 2020.[10]

[10] See generally U.S. producers' questionnaire responses, question II-9b.

Table III-14
SRC pipe and tube: U.S. producers' employment related data, by period

Item	2018	2019	2020
Production and related workers (PRWs) (number)	2,285	2,312	2,208
Total hours worked (1,000 hours)	5,408	5,140	4,545
Hours worked per PRW (hours)	2,367	2,223	2,058
Wages paid ($1,000)	112,023	114,445	108,712
Hourly wages (dollars per hour)	$20.71	$22.27	$23.92
Productivity (pounds per hour)	105.8	106.1	112.5
Unit labor costs (dollars per 1,000 pounds)	$196	$210	$213

Source: Compiled from data submitted in response to Commission questionnaires.

Part IV: U.S. imports, apparent U.S. consumption, and market shares

U.S. importers

The Commission issued importer questionnaires to 60 firms believed to import SRC pipe and tube, as well as to all U.S. producers of SRC pipe and tube.[1] Twenty-three firms provided usable questionnaire responses.[2] These responses were equivalent to 67.8 percent of U.S. imports from Vietnam and 78.3 percent of U.S. imports from other sources in 2020 under HTS statistical reporting numbers 7411.10.1030 and 7411.10.1090, the two statistical reporting numbers under the HTS subheading for seamless tubes and pipes of refined copper.[3] Given the incomplete response rate, data for U.S. imports presented in this report are based on official import statistics.

Table IV-1 lists all responding U.S. importers of SRC pipe and tube from Vietnam and other sources, their locations, and their shares of reported U.S. imports, in 2020.

[1] The Commission issued questionnaires to those firms identified in the petition along with firms that, based on a review of data from third party sources, may have accounted for more than one percent of total imports under HTS subheading 7411.10.10 in 2017-19.

[2] ***.

[3] ***.

***.

Table IV-1
SRC pipe and tube: U.S. importers, their headquarters, and share of reported imports by source, 2020

Shares in percent

Firm	Headquarters	Vietnam	Nonsubject sources	All import sources
ABCO	Chatham, MA	***	***	***
All Tools	Guaynabo, PR	***	***	***
ASK Products	Naperville, IL	***	***	***
Atlas	San Diego, CA	***	***	***
Burndy	Manchester, NH	***	***	***
Cerro	Sauget, IL	***	***	***
Dexter	Brooklyn, NY	***	***	***
Everwell	Miami, FL	***	***	***
GD Copper	Pine Hill, AL	***	***	***
Globomotive	Mableton, GA	***	***	***
Hailiang America	Diamond Bar, CA	***	***	***
H&H Tube	Vanderbilt, MI	***	***	***
JMF	Bettendorf, IA	***	***	***
MetTube	Shah Alam, Malaysia	***	***	***
Mueller	Collierville, TN	***	***	***
National Copper	Huntsville, AL	***	***	***
Rahn	Whittier, CA	***	***	***
Reftekk	Boise, ID	***	***	***
Southland	Tujunga, CA	***	***	***
ST Products	Duncansville, PA	***	***	***
Traxys	New York, NY	***	***	***
Virtus	Franklin, KY	***	***	***
Wells	Chicago, IL	***	***	***
All firms	Various	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

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

U.S. imports

Table IV-2 and figure IV-1 present data for U.S. imports of SRC pipe and tube.[4] U.S. imports of SRC pipe and tube were relatively stable from 2018 to 2019, as a modest increase in quantity was offset by declining average unit values, resulting in a modest decrease in the value

[4] The prehearing report for this investigation presented information on critical circumstances following Commerce's preliminary negative determination of critical circumstances (86 FR 7698). Commerce subsequently issued a final negative determination of critical circumstances as part of its final determination concerning sales at less than fair value (86 FR 33228), and therefore this information is not presented in this report.

of U.S. imports from all import sources. In 2020, both the quantity and the value of U.S. imports of SRC pipe and tube increased, despite a continued decline in average unit values. The quantity and value of U.S. imports from Vietnam increased absolutely, as a share of total imports, and relative to U.S. production in both 2019 and 2020. The average unit values of U.S. imports from Vietnam declined in 2019 and 2020, and throughout 2018-20 were lower than the average unit values of nonsubject sources

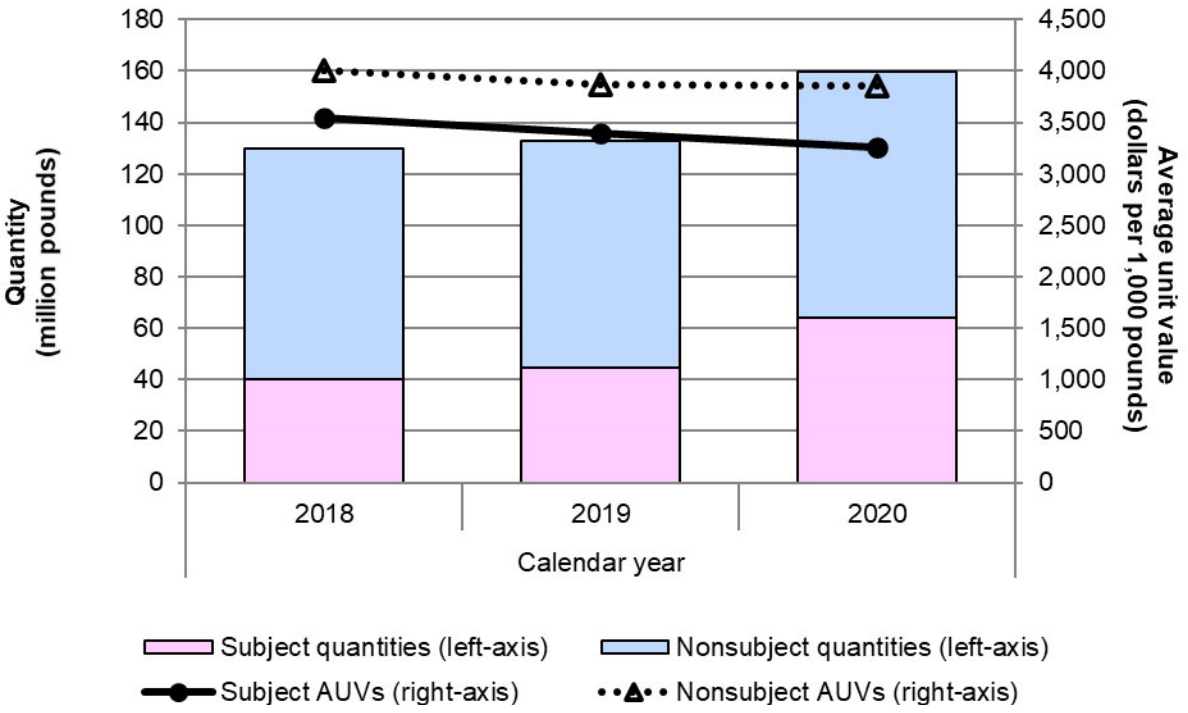
Table IV-2
SRC pipe and tube: U.S. imports, by source and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per 1,000 pounds; Share and ratios in percent; Ratio represent ratios to U.S. production

Source of imports	Measure	2018	2019	2020
Vietnam	Quantity	40,377	44,629	64,133
Nonsubject sources	Quantity	89,315	88,135	95,817
All import sources	Quantity	129,692	132,764	159,950
Vietnam	Value	142,996	151,776	209,220
Nonsubject sources	Value	358,201	341,357	369,661
All import sources	Value	501,197	493,133	578,881
Vietnam	Unit value	3,542	3,401	3,262
Nonsubject sources	Unit value	4,011	3,873	3,858
All import sources	Unit value	3,865	3,714	3,619
Vietnam	Share of quantity	31.1	33.6	40.1
Nonsubject sources	Share of quantity	68.9	66.4	59.9
All import sources	Share of quantity	100.0	100.0	100.0
Vietnam	Share of value	28.5	30.8	36.1
Nonsubject sources	Share of value	71.5	69.2	63.9
All import sources	Share of value	100.0	100.0	100.0
Vietnam	Ratio	7.1	8.2	12.5
Nonsubject sources	Ratio	15.6	16.2	18.7
All import sources	Ratio	22.7	24.3	31.3

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7411.10.1030 and 7411.10.1090, accessed June 21, 2021. Import statistics are based on imports for consumption.

Figure IV-1
SRC pipe and tube: U.S. import quantities and average unit values, by source and period



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7411.10.1030 and 7411.10.1090, accessed June 21, 2021. Import statistics are based on imports for consumption.

Table IV-3 presents additional detail for U.S. imports of SRC pipe and tube from nonsubject sources. The five largest nonsubject sources in 2020 were Canada, Korea, Mexico, Thailand, and Greece. The quantity of U.S. imports from each of these sources other than Greece increased from 2018 to 2020, but while imports from Canada, Korea, and Mexico increased from between 5.0 and 6.9 percent per source, imports from Thailand increased nearly five thousand percent in the same period (from 203,000 pounds in 2018 to 10.1 million in 2020).[5] This increase in nonsubject imports from Thailand accounted for all of the increase in nonsubject import market share from 2018 to 2020.[6]

[5] The nonsubject source with the second-largest growth from 2018 to 2020 was Bahrain. Imports from Bahrain grew from 677,000 pounds in 2018 to 4.9 million pounds in 2020. ***.

[6] Petitioner attributes this increase to a decision by Hailiang, the largest producer in Vietnam, to shift production to Thailand at around the same time the petition was filed. Petitioner's prehearing brief, pp. 25-26. Leading U.S. importers identifying Thailand as a source of nonsubject imports include ***.

Table IV-3
SRC pipe and tube: U.S. imports from nonsubject sources, by source and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per 1,000 pounds

Source	Measure	2018	2019	2020
Canada	Quantity	27,828	29,504	29,223
Korea	Quantity	15,956	16,245	16,777
Mexico	Quantity	9,501	10,821	10,155
Thailand	Quantity	203	884	10,128
Greece	Quantity	9,868	6,339	6,552
Bahrain	Quantity	677	2,428	4,937
Malaysia	Quantity	5,921	5,414	4,647
Brazil	Quantity	5,838	2,448	3,409
Germany	Quantity	2,627	4,356	3,118
China	Quantity	1,189	905	493
All other nonsubject sources	Quantity	9,706	8,793	6,379
All nonsubject sources	Quantity	89,315	88,135	95,817
Canada	Value	116,591	120,773	134,551
Korea	Value	58,089	55,673	56,637
Mexico	Value	37,518	40,364	36,889
Thailand	Value	1,070	3,185	31,437
Greece	Value	35,314	21,809	21,734
Bahrain	Value	2,247	8,137	17,078
Malaysia	Value	21,912	19,145	15,904
Brazil	Value	20,106	8,002	11,006
Germany	Value	13,376	20,314	13,455
China	Value	5,581	4,838	3,025
All other nonsubject sources	Value	46,396	39,117	27,944
All nonsubject sources	Value	358,201	341,357	369,661
Canada	Unit Value	4,190	4,093	4,604
Korea	Unit Value	3,641	3,427	3,376
Mexico	Unit Value	3,949	3,730	3,633
Thailand	Unit Value	5,264	3,604	3,104
Greece	Unit Value	3,579	3,441	3,317
Bahrain	Unit Value	3,317	3,351	3,459

Table continued on next page.

Table IV-3--Continued
SRC pipe and tube: U.S. imports from nonsubject sources, by source and period

Shares in percent; shares represent share of total imports from all sources

Source	Measure	2018	2019	2020
Malaysia	Unit Value	3,701	3,536	3,422
Brazil	Unit Value	3,444	3,269	3,228
Germany	Unit Value	5,092	4,664	4,315
China	Unit Value	4,693	5,349	6,135
All other nonsubject sources	Unit Value	4,780	4,449	4,381
All nonsubject sources	Unit Value	4,011	3,873	3,858
Canada	Share of quantity	21.5	22.2	18.3
Korea	Share of quantity	12.3	12.2	10.5
Mexico	Share of quantity	7.3	8.2	6.3
Thailand	Share of quantity	0.2	0.7	6.3
Greece	Share of quantity	7.6	4.8	4.1
Bahrain	Share of quantity	0.5	1.8	3.1
Malaysia	Share of quantity	4.6	4.1	2.9
Brazil	Share of quantity	4.5	1.8	2.1
Germany	Share of quantity	2.0	3.3	1.9
China	Share of quantity	0.9	0.7	0.3
All other nonsubject sources	Share of quantity	7.5	6.6	4.0
All nonsubject sources	Share of quantity	68.9	66.4	59.9
Canada	Share of value	23.3	24.5	23.2
Korea	Share of value	11.6	11.3	9.8
Mexico	Share of value	7.5	8.2	6.4
Thailand	Share of value	0.2	0.6	5.4
Greece	Share of value	7.0	4.4	3.8
Bahrain	Share of value	0.4	1.6	3.0
Malaysia	Share of value	4.4	3.9	2.7
Brazil	Share of value	4.0	1.6	1.9
Germany	Share of value	2.7	4.1	2.3
China	Share of value	1.1	1.0	0.5
All other nonsubject sources	Share of value	9.3	7.9	4.8
All nonsubject sources	Share of value	71.5	69.2	63.9

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7411.10.1030 and 7411.10.1090, accessed June 21, 2021. Import statistics are based on imports for consumption.

Table IV-4 and figure IV-2 present additional detail for U.S. imports of SRC pipe and tube from Vietnam and from nonsubject sources by month. The quantity of U.S. imports from nonsubject sources exceeded the quantity of U.S. imports from Vietnam in every month except August 2020 and October 2020. The quantity of U.S. imports from Vietnam declined from its highest total in October 2020 to its lowest levels in November 2020 through March 2021. The quantity of U.S. imports from nonsubject sources, in contrast, reached its highest level in March 2021.

Table IV-4
SRC pipe and tube: U.S. imports by month, January 2018 through March 2021

Quantity in 1,000 pounds

Year	Month	Vietnam	Nonsubject sources	All import sources
2018	January	2,759	7,812	10,570
2018	February	3,105	6,500	9,605
2018	March	4,966	6,887	11,853
2018	April	2,850	7,742	10,592
2018	May	3,897	8,145	12,042
2018	June	4,960	7,428	12,388
2018	July	3,842	8,869	12,712
2018	August	3,350	7,405	10,755
2018	September	2,509	7,377	9,886
2018	October	3,777	7,774	11,551
2018	November	2,328	7,021	9,349
2018	December	2,032	6,357	8,389
2019	January	2,541	7,085	9,626
2019	February	2,560	7,529	10,089
2019	March	3,091	7,019	10,109
2019	April	4,089	7,966	12,056
2019	May	4,813	7,810	12,623
2019	June	5,178	8,451	13,629
2019	July	6,167	7,277	13,443
2019	August	4,945	7,866	12,811
2019	September	4,593	6,619	11,211
2019	October	2,206	8,143	10,350
2019	November	2,487	6,437	8,924
2019	December	1,960	5,933	7,893

Table continued on next page.

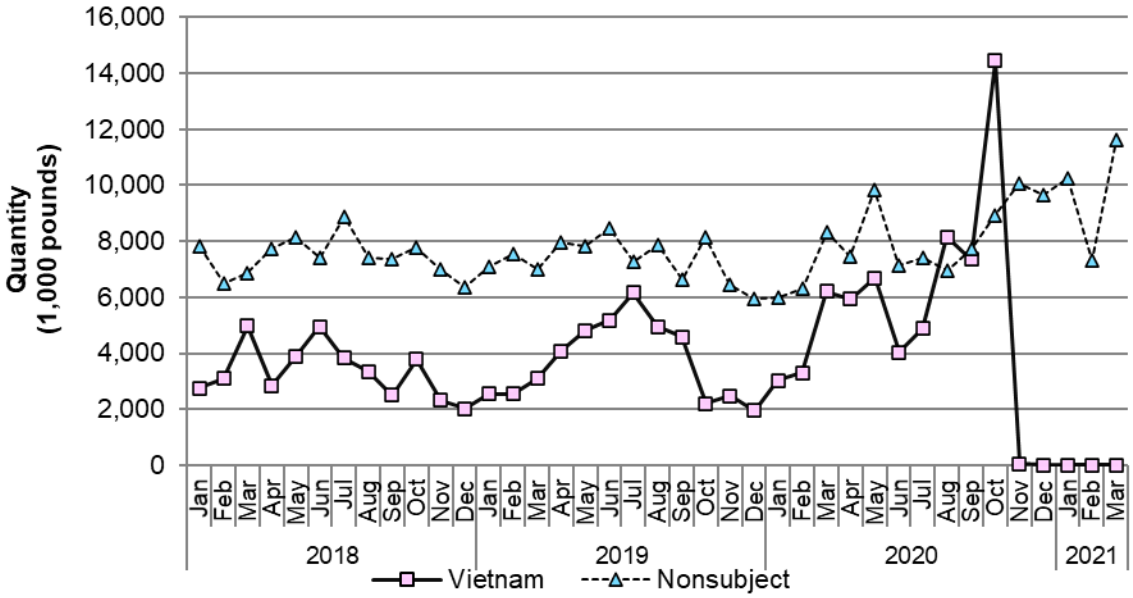
Table IV-4--Continued
SRC pipe and tube: U.S. imports by month, January 2018 through March 2021

Quantity in 1,000 pounds

Year	Month	Vietnam	Nonsubject sources	All import sources
2020	January	3,028	6,015	9,043
2020	February	3,303	6,297	9,601
2020	March	6,211	8,320	14,531
2020	April	5,949	7,457	13,405
2020	May	6,682	9,840	16,522
2020	June	4,045	7,142	11,187
2020	July	4,883	7,430	12,313
2020	August	8,152	6,939	15,091
2020	September	7,356	7,718	15,074
2020	October	14,446	8,936	23,382
2020	November	66	10,051	10,118
2020	December	10	9,674	9,684
2021	January	1	10,232	10,233
2021	February	---	7,317	7,317
2021	March	3	11,639	11,641

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7411.10.1030 and 7411.10.1090, accessed June 21, 2021. Import statistics are based on imports for consumption.

Figure IV-2
SRC pipe and tube: U.S. imports from subject and aggregated nonsubject sources, by month, January 2018 through March 2021



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7411.10.1030 and 7411.10.1090, accessed June 21, 2021. Import statistics are based on imports for consumption.

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.[7] Negligible imports are generally defined in the Act, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.[8] Imports from Vietnam accounted for 37.3 percent of total imports of SRC pipe and tube by quantity from June 2019 through May 2020.

Table IV-5
SRC pipe and tube: U.S. imports in the twelve month period preceding the filing of the petition, June 2019 through May 2020

Quantity in 1,000 pounds; share of quantity in percent

Source of imports	Quantity	Share of quantity
Vietnam	52,709	37.3
Nonsubject sources	88,655	62.7
All import sources	141,364	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7411.10.1030 and 7411.10.1090, accessed June 21, 2021. Import statistics are based on imports for consumption.

[7] Sections 703(a)(1), 705(b)(1), 733(a)(1), and 735(b)(1) of the Act (19 U.S.C. §§ 1671b(a)(1), 1671d(b)(1), 1673b(a)(1), and 1673d(b)(1)).

[8] Section 771 (24) of the Act (19 U.S.C § 1677(24)).

Apparent U.S. consumption and market shares

Tables IV-6 and IV-7, and figure IV-3, present data on apparent U.S. consumption and market shares for SRC pipe and tube. Apparent U.S. consumption decreased by 4.1 percent by quantity, and 9.0 percent by value, from 2018 to 2020. The quantity of U.S. shipments of domestically produced SRC pipe and tube accounted for more than three-quarters of the U.S. market throughout the period for which data were collected. However, market share held by U.S. producers decreased by 5.5 percentage points from 2018 to 2020.

Subject imports from Vietnam accounted for a smaller share of apparent U.S. consumption as compared to U.S. producers or imports from nonsubject sources in all periods, but increased as a share from 2018 to 2020. The quantity of U.S. imports from Vietnam increased as a share of apparent U.S. consumption by 3.9 percentage points from 2018 to 2020, while U.S. imports from nonsubject sources increased by 1.6 percentage points.

Table IV-6
SRC pipe and tube: Apparent U.S. consumption, by period

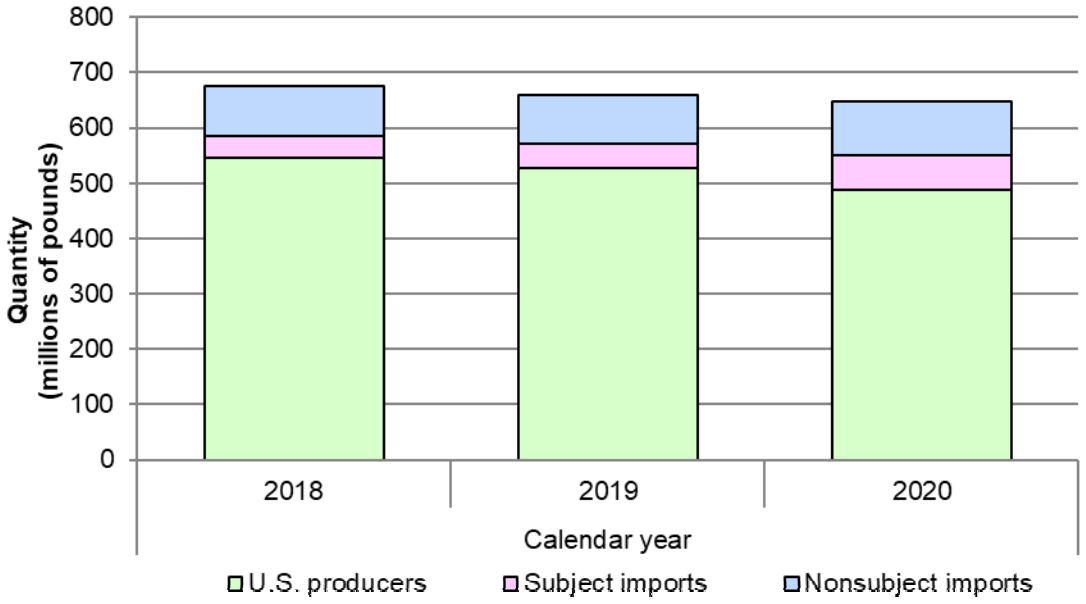
Quantity in 1,000 pounds; Value in 1,000 dollars

Source	Measure	2018	2019	2020
U.S. producers	Quantity	545,367	526,869	487,480
Vietnam	Quantity	40,377	44,629	64,133
Nonsubject sources	Quantity	89,315	88,135	95,817
All import sources	Quantity	129,692	132,764	159,950
All sources	Quantity	675,059	659,633	647,430
U.S. producers	Value	2,025,126	1,847,031	1,719,099
Vietnam	Value	142,996	151,776	209,220
Nonsubject sources	Value	358,201	341,357	369,661
All import sources	Value	501,197	493,133	578,881
All sources	Value	2,526,323	2,340,164	2,297,980

Source: Compiled from data submitted in response to questionnaire data and official U.S. import statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7411.10.1030 and 7411.10.1090, accessed June 21, 2021. Import statistics are based on imports for consumption.

Note: U.S. producer data are U.S. shipments based on questionnaire data and U.S. imports data are U.S. imports based on official import statistics.

Figure IV-3
SRC pipe and tube: Apparent U.S. consumption, by period



Source: Compiled from data submitted in response to questionnaire data and official U.S. import statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7411.10.1030 and 7411.10.1090, accessed June 21, 2021. Import statistics are based on imports for consumption.

Table IV-7
SRC pipe and tube: Shares of apparent U.S. consumption, by period

Shares in percent

Source	Measure	2018	2019	2020
U.S. producers	Share of quantity	80.8	79.9	75.3
Vietnam	Share of quantity	6.0	6.8	9.9
Nonsubject sources	Share of quantity	13.2	13.4	14.8
All import sources	Share of quantity	19.2	20.1	24.7
All sources	Share of quantity	100.0	100.0	100.0
U.S. producers	Share of value	80.2	78.9	74.8
Vietnam	Share of value	5.7	6.5	9.1
Nonsubject sources	Share of value	14.2	14.6	16.1
All import sources	Share of value	19.8	21.1	25.2
All sources	Share of value	100.0	100.0	100.0

Source: Compiled from data submitted in response to questionnaire data and official U.S. import statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7411.10.1030 and 7411.10.1090, accessed June 21, 2021. Import statistics are based on imports for consumption.

Part V: Pricing data

Factors affecting prices

Raw material costs

The primary raw material used in the production of SRC pipe and tube is metallic copper, either in the form of copper cathodes ("primary copper") or scrap. Primary copper is purchased from copper producers that electrolytically refine copper from smelting furnaces into plate-shaped copper cathodes of at least 99.95 percent purity. Scrap copper may include primary scrap returned from downstream production within the SRC tubular products mill and secondary scrap purchased from outside sources. Secondary scrap may include copper wire and tubing recovered from demolished or renovated structures and scrap from other copper industries. The mix of raw materials used may vary from 100 percent copper cathode to a mix of copper cathode, primary scrap, and secondary scrap. The input mix may vary due to the technical capabilities of specific producers' facilities and economic factors like cost and availability.[1]

U.S. producers' raw material costs for producing SRC pipe and tube consisted of 61.3 percent copper cathode, 34.0 percent copper scrap, and 4.7 percent other material inputs in 2020. All responding U.S. producers indicated raw material prices either increased or fluctuated during 2018-20; however, the raw material share of cost of goods sold decreased from 85.5 to 82.7 percent during the same period. Petitioner indicated that while it forecasts copper prices from ***, it makes production decisions primarily based on ***.[2]

Table V-1 and figure V-1 show the price of copper scrap and the price of copper cathode on the COMEX exchange from January 2018 to April 2021. The price initially fluctuated and eventually increased for both copper indices. Prices reached a low of *** for copper scrap and *** for copper cathode in April 2020 and then increased to *** and ***, respectively, by April 2021.

[1] *Seamless Refined Copper Pipe and Tube from China and Mexico, Inv. Nos. 731-TA-1174-1175 (Review),* USITC Publication 4650, November 2016, p. V-1. See also Petition, p. 9.

[2] Petitioner's Responses to Questions from the Commission, p. 3.

Table V-1

SRC pipe and tube: U.S copper cathode and scrap monthly prices, January 2018 – April 2021

Dollars per pound

Period	Comex copper price	Copper scrap price
January 2018	***	***
February 2018	***	***
March 2018	***	***
April 2018	***	***
May 2018	***	***
June 2018	***	***
July 2018	***	***
August 2018	***	***
September 2018	***	***
October 2018	***	***
November 2018	***	***
December 2018	***	***
January 2019	***	***
February 2019	***	***
March 2019	***	***
April 2019	***	***
May 2019	***	***
June 2019	***	***
July 2019	***	***
August 2019	***	***
September 2019	***	***
October 2019	***	***
November 2019	***	***
December 2019	***	***
January 2020	***	***
February 2020	***	***
March 2020	***	***
April 2020	***	***
May 2020	***	***
June 2020	***	***
July 2020	***	***
August 2020	***	***
September 2020	***	***
October 2020	***	***
November 2020	***	***
December 2020	***	***
January 2021	***	***
February 2021	***	***
March 2021	***	***
April 2021	***	***

Source: ***, retrieved May 6, 2021.

Note: Copper scrap is the No.1 scrap buying price delivered to refiners. The COMEX price is the copper high grade 1st active series.

Figure V-1
SRC pipe and tube: U.S copper cathode and scrap monthly prices, dollars per pound, January 2018 – April 2021

* * * * * * *

Source: ***, retrieved May 6, 2021.

Note: Copper scrap is the No.1 scrap buying price delivered to refiners. The COMEX price is the copper high grade 1st active series.

Transportation costs to the U.S. market

Transportation costs for SRC pipe and tube shipped from Vietnam to the United States averaged 1.9 percent for Vietnam during 2020. These estimates were derived from official import data and represent the transportation and other charges on imports.[3]

U.S. inland transportation costs

Five of 6 responding U.S. producers and 8 of 12 responding importers reported that they typically arrange transportation to their customers. U.S. producers reported that their U.S. inland transportation costs ranged from 0.1 to 3.0 percent, while most importers reported costs of 2.0 to 5.0 percent.

[3] The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2020 and then dividing by the customs value based on the HTS statistical reporting numbers 7411.10.1030 and 7411.10.1090.

Pricing practices

Pricing methods

The petitioner characterizes the overall U.S. market for SRC pipe and tube as having a "relatively high degree of price transparency."[4] Both U.S. producers and subject importers note SRC pipe and tube prices are largely based on copper prices. U.S. producers typically use COMEX copper prices, while Vietnamese product may be indexed to London Metal Exchange ("LME") prices.[5] However, plumbing and commercial SRC pipe and tube production have separate pricing methods.

According to the petitioner, SRC pipe and tube sales for plumbing are spot sales based on a published price list, which is adjusted to account for "changes in copper cost and other market conditions," with competition for the sale based on a multiplier.[6] [7] The multiplier represents the level of discount off the set price list and "is the basis of competition among producers."[8] The petitioner explained that both domestic producers' and subject importers' sales price is the list price adjusted by the negotiated multiplier, but noted that some producers, including Vietnamese suppliers, list their net prices without a multiplier.[9]

The petitioner stated that SRC pipe and tube for industrial or commercial applications is sold pursuant to annual contracts and is sold directly to OEMs.[10] Prices are set on a fabrication charge and the copper metal cost. Competition for sales to industrial end users is based on the fabrication charge, as the metal cost is considered a pass-through to the customers.[11]

U.S. producers and importers reported setting prices using transaction-by-transaction negotiations, contracts, and set price lists (table V-2).

---

[4] Petitioner's postconference brief, p. II-5. See also examples of petitioner being informed by purchasers of subject import suppliers' prices, at Petitioner's Responses to Questions from the Commission, exhibit 1.

[5] Petitioner's postconference brief, p. II-3.

[6] Statement of Devin Malone, Mueller, p. 3.

[7] The multiplier is not published and is communicated verbally to purchasers. Mueller's multiplier ranges from *** to ***. Petitioner's postconference brief, p. II-5.

[8] Petitioner's postconference brief, p. I-14, n. 39.

[9] Statement of Devin Malone, Mueller, p. 3, *see also* Petitioner's postconference brief, pp. II-3-II-4.

[10] Statement of Devin Malone, Mueller, p. 3.

[11] Statement of Devin Malone, Mueller, p. 3; and Petitioner's postconference brief, p. I-14, n. 39.

Table V-2
SRC pipe and tube: U.S. producers' and importers' reported price setting methods, by number of responding firms

Method	U.S. producers	U.S. importers
Transaction-by-transaction	6	13
Contract	5	10
Set price list	5	7
Other	0	2
Responding firms	6	20

Source: Compiled from data submitted in response to Commission questionnaires.

Note: The sum of responses down may not add up to the total number of responding firms as each firm was instructed to check all applicable price setting methods employed.

U.S. producers reported selling the majority (*** percent) of their SRC pipe and tube in the spot market and *** percent via contracts, while importers reported selling almost all (*** percent) of their product from Vietnam in the spot market (table V-3).

Table V-3
SRC pipe and tube: U.S. producers' and importers' shares of U.S. commercial shipments by type of sale, 2020

Share in percent.

Item	U.S. producers	Subject U.S. importers
Long-term contracts	***	***
Annual contract	***	***
Short-term contracts	***	***
Spot sales	***	***
Total	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Because of rounding, figures may not add to the totals shown.

All U.S. producers reported using spot sales, and 4 of 6 reported most of their sales were spot sales. Two U.S. producers (***) indicated long-term contracts with an average duration of *** as the most common sales condition. Long-term contracts are typically nonnegotiable, with prices indexed to raw material costs. *** noted indexes used for contracts typically are COMEX and/or LME.

Ten of 21 purchasers reported purchasing SRC pipe and tube weekly, 6 purchase daily, 3 monthly, 2 based on need, and one each indicated making purchases quarterly or annually. Eighteen of 22 responding purchasers indicated that the frequency of purchases had not changed since 2018. Reasons cited for changes in frequency included *** noting higher volumes sold, *** noting a change in raw material supplier for chrome zinc as a substitute for copper, and *** noting that it now buys aluminum instead of SRC pipe and tube. Most

(17 of 22 responding) purchasers reported contacting one to three suppliers before making a purchase.

Sales terms and discounts

U.S. producers (5 of 6) typically quote prices on an f.o.b. basis, while importers (7 of 12 responding) typically quote prices on a delivered basis. U.S. producers (4 of 6) most often reported that they have no discount policy, although three producers reported offering quantity discounts, and two producers reported offering total volume discounts.[12] Twelve importers have no discount policy, while ten offer quantity or total volume discounts.

Price leadership

When asked to list price leaders in the SRC pipe and tube market, most U.S. purchasers did not name any firms. Three of the six responding purchasers reported that U.S. producer Mueller was a price leader. Other price leaders mentioned were *** Wieland, Howell Pipe, EDX, Hailiang, PMA Brazil, and Italian producers PDM, Ebrille, and PTubes.

Price data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following SRC pipe and tube products shipped to unrelated U.S. customers during 2018-20.

Product 1.-- Seamless refined copper pipe and tube, 3/8" OD, ACR/RST Coil, 50' Length.

Product 2.-- Seamless refined copper pipe and tube, 3/4" OD, ACR/RST Coil, 50' Length.

Product 3.-- Seamless refined copper pipe and tube, 3/8" OD, Inner-Grooved LWC, 0.0110" -0.0144" bottom wall thickness.

Product 4.-- Seamless refined copper pipe and tube, 3/8" OD, Smooth Bore LWC, 0.0249"-0.0327" bottom wall thickness.

[12] U.S. producer/importer *** noted sales include cash discount, promotional discount, and/or quantity discount. U.S. producer/importer *** noted plumbing tube sales include price, multiplier, and volume rebate, while commercial tube is quoted by contract or transaction-by-transaction with fabrication plus metal.

Product 5.-- Seamless refined copper pipe and tube, 1/4" OD, Smooth Bore LWC, 0.0200” - 0.0340" bottom wall thickness.

Product 6.-- Seamless refined copper pipe and tube, 1/2" OD, Smooth Bore LWC, 0.0160” - 0.0330" bottom wall thickness.

Five of 6 U.S. producers and 3 of 23 importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.[13] Pricing data reported by these firms accounted for approximately *** percent of the value of U.S. producers’ shipments of SRC pipe and tube and *** percent of the value of U.S. shipments of subject imports from Vietnam in 2020.[14]

Price data for products 1-6 are presented in tables V-4 to V-9 and figures V-2 to V-7.

Table V-4
SRC pipe and tube: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, and margins of underselling/(overselling), by quarter

Price in dollars per piece, quantity in pieces, margin in percent.

Period	U.S. price	U.S. quantity	Vietnam price	Vietnam quantity	Vietnam margin
2018 Q1	***	***	***	***	***
2018 Q2	***	***	***	***	***
2018 Q3	***	***	***	***	***
2018 Q4	***	***	***	***	***
2019 Q1	***	***	***	***	***
2019 Q2	***	***	***	***	***
2019 Q3	***	***	***	***	***
2019 Q4	***	***	***	***	***
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1: Seamless refined copper pipe and tube, 3/8" OD, ACR/RST Coil, 50' Length.

[13] Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates.

[14] *** importers reported price data for product 3 imported from Vietnam.

Figure V-2
SRC pipe and tube: Weighted-average prices and quantities of domestic and imported product 1, by quarter

* * * * * * *

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1: Seamless refined copper pipe and tube, 3/8" OD, ACR/RST Coil, 50' Length.

Table V-5
SRC pipe and tube: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, and margins of underselling/(overselling), by quarter

Price in dollars per piece, quantity in pieces, margin in percent.

Period	U.S. price	U.S. quantity	Vietnam price	Vietnam quantity	Vietnam margin
2018 Q1	***	***	***	***	***
2018 Q2	***	***	***	***	***
2018 Q3	***	***	***	***	***
2018 Q4	***	***	***	***	***
2019 Q1	***	***	***	***	***
2019 Q2	***	***	***	***	***
2019 Q3	***	***	***	***	***
2019 Q4	***	***	***	***	***
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 2: Seamless refined copper pipe and tube, 3/4" OD, ACR/RST Coil, 50' Length.

Figure V-3
SRC pipe and tube: Weighted-average prices and quantities of domestic and imported product 2, by quarter

* * * * * * *

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 2: Seamless refined copper pipe and tube, 3/4" OD, ACR/RST Coil, 50' Length.

Table V-6
SRC pipe and tube: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, and margins of underselling/(overselling), by quarter

Price in dollars per pound, quantity in pounds, margin in percent.

Period	U.S. price	U.S. quantity	Vietnam price	Vietnam quantity	Vietnam margin
2018 Q1	***	***	***	***	***
2018 Q2	***	***	***	***	***
2018 Q3	***	***	***	***	***
2018 Q4	***	***	***	***	***
2019 Q1	***	***	***	***	***
2019 Q2	***	***	***	***	***
2019 Q3	***	***	***	***	***
2019 Q4	***	***	***	***	***
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 3: Seamless refined copper pipe and tube, 3/8" OD, Inner-Grooved LWC, 0.0110" -0.0144" bottom wall thickness.

Figure V-4
SRC pipe and tube: Weighted-average prices and quantities of domestic and imported product 3, by quarter

* * * * * * *

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 3: Seamless refined copper pipe and tube, 3/8" OD, Inner-Grooved LWC, 0.0110" -0.0144" bottom wall thickness.

Table V-7
SRC pipe and tube: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, and margins of underselling/(overselling), by quarter

Price in dollars per pound, quantity in pounds, margin in percent.

Period	U.S. price	U.S. quantity	Vietnam price	Vietnam quantity	Vietnam margin
2018 Q1	3.81	2,373,271	***	***	***
2018 Q2	3.72	2,364,645	***	***	***
2018 Q3	3.61	2,000,688	***	***	***
2018 Q4	3.52	1,925,445	***	***	***
2019 Q1	3.47	1,557,293	***	***	***
2019 Q2	3.55	1,956,380	***	***	***
2019 Q3	3.43	1,898,468	***	***	***
2019 Q4	3.31	1,158,732	***	***	***
2020 Q1	3.34	1,983,372	***	***	***
2020 Q2	3.19	1,386,343	***	***	***
2020 Q3	3.47	1,610,327	***	***	***
2020 Q4	3.74	1,256,789	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 4: Seamless refined copper pipe and tube, 3/8" OD, Smooth Bore LWC, 0.0249"-0.0327" bottom wall thickness.

Figure V-5
SRC pipe and tube: Weighted-average prices and quantities of domestic and imported product 4, by quarter

* * * * * * *

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 4: Seamless refined copper pipe and tube, 3/8" OD, Smooth Bore LWC, 0.0249"-0.0327" bottom wall thickness.

Table V-8
SRC pipe and tube: Weighted-average f.o.b. prices and quantities of domestic and imported product 5, and margins of underselling/(overselling), by quarter

Price in dollars per pound, quantity in pounds, margin in percent.

Period	U.S. price	U.S. quantity	Vietnam price	Vietnam quantity	Vietnam margin
2018 Q1	***	***	***	***	***
2018 Q2	***	***	***	***	***
2018 Q3	***	***	***	***	***
2018 Q4	***	***	***	***	***
2019 Q1	***	***	***	***	***
2019 Q2	***	***	***	***	***
2019 Q3	***	***	***	***	***
2019 Q4	***	***	***	***	***
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 5: Seamless refined copper pipe and tube, 1/4" OD, Smooth Bore LWC, 0.0200” - 0.0340" bottom wall thickness.

Figure V-6
SRC pipe and tube: Weighted-average prices and quantities of domestic and imported product 5, by quarter

* * * * * * *

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 5: Seamless refined copper pipe and tube, 1/4" OD, Smooth Bore LWC, 0.0200” - 0.0340" bottom wall thickness.

Table V-9
SRC pipe and tube: Weighted-average f.o.b. prices and quantities of domestic and imported product 6, and margins of underselling/(overselling), by quarter

Price in dollars per pound, quantity in pounds, margin in percent.

Period	U.S. price	U.S. quantity	Vietnam price	Vietnam quantity	Vietnam margin
2018 Q1	3.87	2,504,203	***	***	***
2018 Q2	3.78	2,819,918	***	***	***
2018 Q3	3.58	2,911,184	***	***	***
2018 Q4	3.49	2,611,170	***	***	***
2019 Q1	3.49	2,957,795	***	***	***
2019 Q2	3.56	3,140,739	***	***	***
2019 Q3	3.41	3,092,093	***	***	***
2019 Q4	3.32	2,471,780	***	***	***
2020 Q1	3.34	2,873,015	***	***	***
2020 Q2	3.15	2,359,532	***	***	***
2020 Q3	3.43	2,287,290	***	***	***
2020 Q4	3.72	2,105,147	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 6: Seamless refined copper pipe and tube, 1/2" OD, Smooth Bore LWC, 0.0160” - 0.0330" bottom wall thickness.

Figure V-7
SRC pipe and tube: Weighted-average prices and quantities of domestic and imported product 6, by quarter

* * * * * * *

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 6: Seamless refined copper pipe and tube, 1/2" OD, Smooth Bore LWC, 0.0160” - 0.0330" bottom wall thickness.

Price trends

In general, prices fluctuated during 2018-20. As shown in the table V-10, domestic price increases ranged from *** to *** percent for products 1 and 2 during 2018-20, while price decreases ranged from *** to *** for products 3, 4, and 6, and increased *** percent for product 5.[15] Price decreases for imported SRC pipe and tube ranged from *** to *** percent (only available for products 1 and 2). Both U.S. and Vietnamese prices decreased from the beginning of the period and then dipped into the second quarter of 2020; however, some U.S. prices recovered to January 2018 levels by the end of 2020, while import prices did not.

Table V-10
SRC pipe and tube: Number of quarters containing observations, low price/cost, high price/cost, and change in price/cost over period, by product and country, 2018-20

Prices for products 1 and 2 in dollars per piece; prices for products 3 through 6 in dollars per pound; change in percent.

Product	Source	Number of quarters	Low price	High price	Change over period
Product 1	United States	***	***	***	***
Product 1	Vietnam	***	***	***	***
Product 2	United States	***	***	***	***
Product 2	Vietnam	***	***	***	***
Product 3	United States	***	***	***	***
Product 3	Vietnam	***	***	***	***
Product 4	United States	12	3.19	3.81	(1.9)
Product 4	Vietnam	***	***	***	***
Product 5	United States	***	***	***	***
Product 5	Vietnam	***	***	***	***
Product 6	United States	12	3.15	3.87	(3.8)
Product 6	Vietnam	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Percentage change from the first quarter in which data were available in 2018 to the last quarter in which data were available in 2020.

[15] Petitioner indicated that products 3-5 are commercial tube products that OEMs often import themselves, while products 1-2 are coil products used in plumbing applications. Petition, pp. 29-30. Product 6 was added to try to improve coverage. See Petitioner's comments on draft questionnaires, p. 3. In 2020, data for products 1-2 accounted for *** of U.S. producers' pricing product data and *** percent of pricing data from Vietnam, by value. Conversely, data for products 3-6 accounted for *** percent of U.S. producers' pricing product data and *** percent of pricing from Vietnam.

Price comparisons

As shown in table V-11, prices for product imported from Vietnam were below those for U.S.-produced product in all 35 instances; margins of underselling ranged from 1.8 to 19.8 percent. There were no instances of overselling recorded.

Table V-11
SRC pipe and tube: Instances of underselling and the range and average of margins, by product, 2018-20

Quantity for 1 and 2 in pieces; quantity for 3 through 6 in pounds; margin in percent

Item	Number of quarters	Quantity	Average margin	Minimum margin	Maximum margin
Product 1	***	***	***	***	***
Product 2	***	***	***	***	***
Subtotal, underselling products 1 and 2	***	***	***	***	***
Product 3	***	***	***	***	***
Product 4	***	***	***	***	***
Product 5	***	***	***	***	***
Product 6	***	***	***	***	***
Subtotal, underselling products 3 through 6	***	***	***	***	***
Total, underselling	35	***	8.9	1.8	19.9

Table continued.

Table V-11 Continued
SRC pipe and tube: Instances of overselling and the range and average of margins, by product, 2018-20

Quantity for 1 and 2 in pieces; quantity for 3 through 6 in pounds; margin in percent

Item	Number of quarters	Quantity	Average margin	Minimum margin	Maximum margin
Product 1	---	---	---	---	---
Product 2	---	---	---	---	---
Subtotal, overselling products 1 and 2	---	---	---	---	---
Product 3	---	---	---	---	---
Product 4	---	---	---	---	---
Product 5	---	---	---	---	---
Product 6	---	---	---	---	---
Subtotal, overselling products 3 through 6	---	---	---	---	---
Total, overselling	---	NA	---	---	---

Source**:** Compiled from data submitted in response to Commission questionnaires.

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Lost sales and lost revenue

In the preliminary phase of the investigation, the Commission requested that U.S. producers of SRC pipe and tube identify purchasers with which they experienced instances of lost sales or revenue due to competition from imports of SRC pipe and tube from Vietnam during 2017-19. All five responding U.S. producers submitted lost sales and lost revenue allegations. The five responding U.S. producers identified five firms with which they lost sales or revenue (with five such identifications consisting of lost sales allegations, four consisting of lost revenue allegations, and four consisting of both types of allegations).

In the final phase of the investigation, of the six responding U.S. producers, four reported that they had to either reduce prices or roll back announced price increases, and five firms reported that they had lost sales.

Staff contacted 101 purchasers and received responses from 23 purchasers.[16] Responding purchasers reported purchasing *** pounds of SRC pipe and tube during 2018-20 (table V-12).

Of 23 responding purchasers, 11 (5 of which were distributors) reported that, since 2018, they had purchased imported SRC pipe and tube from Vietnam instead of U.S.-produced product. Nine of these purchasers reported that subject import prices were lower than U.S.-produced product, and six of these purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product. Five purchasers estimated the amount of SRC pipe and tube from Vietnam they purchased instead of domestic product with quantities ranged from *** pounds to *** pounds (table V-13). Purchasers identified quality, delivery, consignment, terms, and cost as non-price reasons for purchasing imported rather than U.S.-produced product.

Of 21 responding purchasers, 1 reported that U.S. producers had reduced prices in order to compete with lower-priced imports from Vietnam; 9 reported that they had not and 12 reported that they did not know (table V-14). Additionally, *** indicated that while there had not been a price reduction, there had been a fabrication rate reduction of *** percent. Purchaser *** reported an estimated price reduction of *** percent. It added that there had been a *** percent gap in the prices of U.S. and Vietnamese SRC pipe and tube that decreased during the last 6 months.

[16] Purchaser *** submitted lost sales lost revenue survey responses in the preliminary phase but did not submit a purchaser questionnaire response in the final phase.

Table V-12
SRC pipe and tube: U.S. purchasers' U.S. purchases and U.S. imports, 2018-20

Quantity in 1,000 pounds; share in percent

Firm	Domestic quantity	Subject quantity	All other quantity	Change in domestic share	Shange in subject share
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All firms	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: All other includes all other sources and unknown sources. Change is the percentage point change in the share of the firm's total purchases of domestic and/or subject country imports between first and last years.
Note: ***.
Note: ***.

Table V-13
SRC pipe and tube: Purchasers' responses to purchasing subject imports instead of domestic product

Quantity in 1,000s of pounds.

Firm	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Explanation
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All firms	Yes--11; No--11	Yes--9; No--2	Yes--6; No--5	***	NA

Source: Compiled from data submitted in response to Commission questionnaires.

Note: ***
Note: ***.
Note: ***.

Table V-14
SRC pipe and tube: Purchasers' responses to U.S. producer price reductions, by firm

Price reduction in percent.

Firm	Producers lowered prices	Price reduction	Explanation
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
All firms	Yes--2; No—8	***	NA

Note: ***.
Note: ***.

Source: Compiled from data submitted in response to Commission questionnaires.

Part VI: Financial experience of U.S. producers

Background

Six U.S. producers *** provided usable financial results on their operations related to SRC pipe and tube. *** responding U.S. producers reported financial data on the basis of generally accepted accounting principles ("GAAP") and *** responding U.S. producers provided their financial data on a calendar year (or essentially equivalent) basis. ***, however ***.

In 2020, *** accounted for *** percent of the U.S. producers' net sales by quantity, *** accounted for *** percent, *** accounted for *** percent, *** accounted for *** percent, *** accounted for *** percent, and *** accounted for *** percent. Net sales consisted of commercial sales (both commercial U.S. shipments and export shipments), transfers to related firms, and internal consumption which accounted for *** percent, *** percent, and *** percent of total net sales quantity during the period for which data were requested, respectively. *** reported transfers to related firms. *** reported internal consumption.[1]

***.[2] Although this results in some degree of double counting for the industry's total sales, the effect is reflected in both revenue and cost of goods sold ("COGS") and therefore results in a reasonable presentation of the industry's profitability during the reporting period. ***

[1] ***. Email from ***, May 11, 2021. ***. Email from ***, May 18, 2021. ***. Emails from ***, May 10 and 24, 2020.

[2] Emails from ***, April 22, 2021 and ***, April 21, 2021.

***, therefore there is no double counting in the industry's financial data.[3]

Staff conducted a verification of ***'s U.S. producers' questionnaire. The verification adjustments were incorporated into this report. ***.[4]

Operations on SRC pipe and tube

Table VI-1 presents income-and-loss data for U.S. producers' operations on SRC pipe and tube. Table VI-2 present corresponding changes in average per 1,000 pounds values ("AUVs"). Table VI-3 presents selected financial information by firm.

[3] Emails from ***, April 22 and May 18, 2021.

[4] Staff verification report, ***, June 15, 2021.

Table VI-1
SRC pipe and tube: Results of operations of U.S. producers, by item and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Ratios in percent and represent ratio to net sales values

Item	Measure	2018	2019	2020
Commercial sales	Quantity	***	***	***
Internal consumption	Quantity	***	***	***
Transfers to related firms	Quantity	***	***	***
Total net sales	Quantity	570,798	550,277	510,085
Commercial sales	Value	***	***	***
Internal consumption	Value	***	***	***
Transfers to related firms	Value	***	***	***
Total net sales	Value	2,124,865	1,932,826	1,807,283
Raw material costs	Value	***	***	***
Direct labor costs	Value	***	***	***
Other factory costs	Value	***	***	***
Less: by-product revenue	Value	***	***	***
Cost of goods sold	Value	1,956,276	1,797,304	1,673,924
Gross profit or (loss)	Value	168,589	135,522	133,359
SG&A expenses	Value	124,786	125,863	113,103
Operating income or (loss)	Value	43,803	9,659	20,256
All other expense, net	Value	14,687	16,400	18,798
Net income or (loss)	Value	29,116	(6,741)	1,458
Depreciation/amortization	Value	37,627	34,822	32,804
Cash flow	Value	***	***	***
Raw material costs	Ratio	***	***	***
Direct labor costs	Ratio	***	***	***
Other factory costs	Ratio	***	***	***
Less: by-product revenue	Ratio	***	***	***
Cost of goods sold	Ratio	92.1	93.0	92.6
Gross profit	Ratio	7.9	7.0	7.4
SG&A expense	Ratio	5.9	6.5	6.3
Operating income or (loss)	Ratio	2.1	0.5	1.1
Net income or (loss)	Ratio	1.4	(0.3)	0.1

Table continued.

Table VI-1--Continued
SRC pipe and tube: Results of operations of U.S. producers, by item and period

Shares in percent and represent share of total COGS before by-product offset; Unit values in dollars per 1,000 pounds; Count in number of firms reporting

Item	Measure	2018	2019	2020
Raw material costs	Share	***	***	***
Direct labor costs	Share	***	***	***
Other factory costs	Share	***	***	***
Cost of goods sold	Share	100.0	100.0	100.0
Commercial sales	Unit value	***	***	***
Internal consumption	Unit value	***	***	***
Transfers to related firms	Unit value	***	***	***
Total net sales	Unit value	3,723	3,512	3,543
Raw material costs	Unit value	***	***	***
Direct labor costs	Unit value	***	***	***
Other factory costs	Unit value	***	***	***
Less: by-product revenue	Unit value	***	***	***
Cost of goods sold	Unit value	3,427	3,266	3,282
Gross profit or (loss)	Unit value	295	246	261
SG&A expenses	Unit value	219	229	222
Operating income or (loss)	Unit value	77	18	40
Net income or (loss)	Unit value	51	(12)	3
Operating losses	Count	***	***	***
Net losses	Count	***	***	***
Data	Count	6	6	6

Source: Compiled from data submitted in response to Commission questionnaires.

Table VI-2
SRC pipe and tube: Changes in AUVs between comparison periods

Changes in percent

Item	2018-20	2018-19	2019-20
Commercial sales	***	***	***
Internal consumption	***	***	***
Transfers to related firms	***	***	***
Total net sales	▼(4.8)	▼(5.6)	▲0.9
Raw material costs	***	***	***
Direct labor costs	***	***	***
Other factory costs	***	***	***
Less: by-product revenue	***	***	***
Cost of goods sold	▼(4.2)	▼(4.7)	▲0.5

Table continued.

Table VI-2—Continued
SRC pipe and tube: Changes in AUVs between comparison periods

Changes in dollars per 1,000 pounds

Item	2018-20	2018-19	2019-20
Commercial sales	***	***	***
Internal consumption	***	***	***
Transfers to related firms	***	***	***
Total net sales	▼(180)	▼(210)	▲31
Raw material costs	***	***	***
Direct labor costs	***	***	***
Other factory costs	***	***	***
Less: by-product revenue	***	***	***
Cost of goods sold	▼(146)	▼(161)	▲15
Gross profit or (loss)	▼(34)	▼(49)	▲15
SG&A expense	▲3	▲10	▼(7)
Operating income or (loss)	▼(37)	▼(59)	▲22
Net income or (loss)	▼(48)	▼(63)	▲15

Source: Compiled from data submitted in response to Commission questionnaires.

Table VI-3
SRC pipe and tube: Firm-by-firm total net sales quantity, by period

Net sales quantity

Quantity in 1,000 pounds

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	570,798	550,277	510,085

Table continued.

Table VI-3—Continued
SRC pipe and tube: Firm-by-firm total net sales value, by period

Net sales value

Value in 1,000 dollars

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	2,124,865	1,932,826	1,807,283

Table continued.

Table VI-3—Continued
SRC pipe and tube: Firm-by-firm cost of goods sold ("COGS"), by period

COGS

Value in 1,000 dollars

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	1,956,276	1,797,304	1,673,924

Table continued.

Table VI-3—Continued
SRC pipe and tube: Firm-by-firm gross profit or (loss), by period

Gross profit or (loss)

Value in 1,000 dollars

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	168,589	135,522	133,359

Table continued.

Table VI-3—Continued
SRC pipe and tube: Firm-by-firm selling, general, and administrative ("SG&A") expenses, by period

SG&A expenses

Value in 1,000 dollars

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	124,786	125,863	113,103

Table continued.

Table VI-3—Continued
SRC pipe and tube: Firm-by-firm operating income or (loss), by period

Operating income or (loss)

Value in 1,000 dollars

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	43,803	9,659	20,256

Table continued.

Table VI-3—Continued
SRC pipe and tube: Firm-by-firm net income or (loss), by period

Net income or (loss)

Value in 1,000 dollars

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	29,116	(6,741)	1,458

Table continued.

Table VI-3—Continued
SRC pipe and tube: Firm-by-firm ratio of COGS to net sales value, by period

COGS to net sales ratio

Ratios in percent

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	92.1	93.0	92.6

Table continued.

Table VI-3—Continued
SRC pipe and tube: Firm-by-firm ratio of gross profit or (loss) to net sales value, by period

Gross profit or (loss) to net sales ratio

Ratios in percent

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	7.9	7.0	7.4

Table continued.

Table VI-3—Continued
SRC pipe and tube: Firm-by-firm ratio of SG&A expenses to net sales value, by period

SG&A expenses to net sales ratio

Ratios in percent

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	5.9	6.5	6.3

Table continued.

Table VI-3—Continued
SRC pipe and tube: Firm-by-firm ratio of operating income or (loss) to net sales value, by period

Operating income or (loss) to net sales ratio

Ratios in percent

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	2.1	0.5	1.1

Table continued.

Table VI-3—Continued
SRC pipe and tube: Firm-by-firm ratio of net income or (loss) to net sales value, by period

Net income or (loss) to net sales ratio

Ratios in percent

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	1.4	(0.3)	0.1

Table continued.

Table VI-3—Continued
SRC pipe and tube: Firm-by-firm unit net sales value, by period

Unit net sales value

Unit values in dollars per 1,000 pounds

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	3,723	3,512	3,543

Table continued.

Table VI-3—Continued
SRC pipe and tube: Firm-by-firm unit raw material cost, by period

Unit raw material costs

Unit values in dollars per 1,000 pounds

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	***	***	***

Table continued.

Table VI-3—Continued
SRC pipe and tube: Firm-by-firm unit conversion value, by period

Unit conversion value

Unit values in dollars per 1,000 pounds

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	***	***	***

Table continued.

Table VI-3—Continued
SRC pipe and tube: Firm-by-firm unit direct labor cost, by period

Unit direct labor costs

Unit values in dollars per 1,000 pounds

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	***	***	***

Table continued.

Table VI-3—Continued
SRC pipe and tube: Firm-by-firm unit other factory costs, by period

Unit other factory costs

Unit values in dollars per 1,000 pounds

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	***	***	***

Table continued.

Table VI-3—Continued
SRC pipe and tube: Firm-by-firm unit COGS, by period

Unit COGS

Unit values in dollars per 1,000 pounds

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	3,427	3,266	3,282

Table continued.

Table VI-3—Continued
SRC pipe and tube: Firm-by-firm unit gross profit or (loss), by period

Unit gross profit or (loss)

Unit values in dollars per 1,000 pounds

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	295	246	261

Table continued.

Table VI-3—Continued
SRC pipe and tube: Firm-by-firm unit SG&A expenses, by period

Unit SG&A expenses

Unit values in dollars per 1,000 pounds

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	219	229	222

Table continued.

Table VI-3—Continued
SRC pipe and tube: Firm-by-firm unit operating income or (loss), by period

Unit operating income or (loss)

Unit values in dollars per 1,000 pounds

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	77	18	40

Table continued.

Table VI-3—Continued
SRC pipe and tube: Firm-by-firm unit net income or (loss), by period

Unit net income or (loss)

Unit values in dollars per 1,000 pounds

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	51	(12)	3

Source: Compiled from data submitted in response to Commission questionnaires.

Net sales

As shown in table VI-1, total net sales quantity and value decreased from 2018 to 2020, declining by 10.6 percent by quantity and 14.9 percent by value during this time. As shown in table VI-3, the net sales quantity and value of *** U.S. producers declined overall from 2018 to 2020. Average unit net sales values declined irregularly from $3,723 per 1,000 pounds in 2018 to $3,543 per 1,000 pounds in 2020, as net sales values declined more steeply than net sales quantities. *** U.S. producers reported an overall decline in net sales value per 1,000 pounds from 2018 to 2020.[5] ***.[6]

Cost of goods sold and gross profit or loss

Raw materials

Total raw material cost is the largest component of COGS, ranging from *** percent in 2019 to *** percent in 2018. Raw materials consist of cathode copper, copper ingots, copper scrap, and other material inputs such as ***

[5] ***. Email from ***, May 19, 2021.
[6] Email from ***, May 10, 2021.

***. On an average per 1,000 pounds basis, the U.S. industry's raw material cost declined irregularly from 2018 to 2020. On a company-specific basis, *** U.S. producers reported an overall decline in average raw material costs per 1,000 pounds from 2018 to 2020. ***.[7]

Table VI-4 presents a break-out of the raw material costs, by type, for calendar year 2020.

Table VI-4
SRC pipe and tube: Raw material costs, by type

Values in 1,000 dollars; Share of value in percent

Item	Value	Share of value
Cathode copper	***	***
Copper ingots	***	***
Copper scrap	***	***
Other material inputs	***	***
All raw materials	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

According to the Petitioner, per-unit conversion values (per-unit net sales values minus per-unit raw material costs) are a relevant measure of financial performance because U.S. producers typically pass through copper costs to their customers.[8] [9] As shown in table VI-3, the average conversion value increased from $*** per 1,000 pounds in 2018 to $*** per 1,000

[7] Email from ***, May 10, 2021 and U.S. producers' questionnaire response of ***, question III-9c. ***, retrieved May 26, 2021.

[8] Postconference brief of Petitioner, Answers to Staff Questions, p. II-6.

[9] ***. Petitioner's responses to questions from the Commission, p. 23.

pounds in 2020. Firms exhibited mixed trends in conversion value during the reporting period. All firms except *** reported that they actively manage copper costs.[10]

Direct labor and other factory costs

Direct labor costs represented between *** and *** percent of total COGS during the period for which data were requested. Direct labor costs per 1,000 pounds declined from $*** in 2018 to $*** in 2020. Other factory costs represented between *** and *** percent of total COGS during this time. Other factory costs per 1,000 pounds increased from $*** in 2018 to $*** in 2020. Individual firms exhibited mixed trends in direct labor and other factory costs per 1,000 pounds. ***.[11] ***.[12]

Cost of goods sold

As shown in table VI-1, the U.S. industry's average COGS per 1,000 pounds declined irregularly from 2018 to 2020 due to declines in average raw material and direct labor costs per 1,000 pounds. *** U.S. producers reported overall declining COGS per 1,000 pounds from 2018

[10] U.S. producers' questionnaire responses, question III-9d.

[11] Estimated value added (total conversion costs (direct labor and other factory costs) as a share of total COGS) for *** ranged from a low of *** percent in 2018 to a high of *** percent in 2019 during the reporting period (based on data in table VI-3).

[12] Email from ***, May 10, 2021. Hedging is the process of offsetting the risk of price movements in the physical market by locking in a price for the same commodity in the futures market. Hedging is a two-step process. A gain or loss in the physical market due to changes in price levels will be countered by changes in the value of a futures position (hedging gain or loss). ***. Emails from ***, ***, and ***, May 18, 2021 and ***, May 19, 2021. ***. Petitioner's responses to questions from the Commission, p. 22. ***. Email from ***, May 19, 2021.

to 2020. The average COGS to net sales ratio irregularly increased from 92.1 percent in 2018 to 92.6 percent in 2020, largely reflecting the greater decline in total net sales compared to the declines in raw material and direct labor costs.[13]

Gross profit or loss

From 2018 to 2020, the overall decline in net sales value was greater than the decline in COGS, thus gross profit declined from $168.6 million in 2018 to $133.4 million in 2020. On a company-specific basis, all U.S. producers except *** reported an overall decline in gross profit from 2018 to 2020. ***.[14] Gross profit on a per 1,000 pounds basis and as a ratio to net sales declined irregularly from 2018 to 2020.

SG&A expenses and operating income or loss

Total SG&A expenses irregularly declined from $124.8 million in 2018 to $113.1 million in 2020. Table VI-3 shows that firms exhibited mixed trends in SG&A expenses during the reporting period. ***.[15] The SG&A expense ratio (SG&A expenses as a share of net sales) irregularly increased from 5.9 percent in 2018 to 6.3 percent in 2020. All U.S. producers except *** reported an overall increasing SG&A expense ratio from 2018 to 2020. ***.[16]

Operating income declined from $43.8 million in 2018 to $9.7 million in 2019 then increased to $20.3 million in 2020. The increase in operating income from 2019 to 2020 which is in contrast with the industry's gross profit trend, is mainly attributable to ***. The operating income margins (operating income as a share of net sales) irregularly declined from 2.1 percent in 2018 to 1.1 percent in 2020.

[13] Scrap/by-product revenue, consisting of the sale of scrap copper slag and dust produced during the course of producing SRC pipe and tube represented *** percent to *** percent of total revenue (net sales value plus scrap/by-product revenue) during the reporting period. All firms except *** reported scrap/by-product revenue. U.S. producers' questionnaire responses, question III-8b.

[14] Email from ***, May 18, 2021.

[15] Email from ***, May 13, 2021.

[16] Email from ***, May 10, 2021.

All U.S. producers except *** reported overall declining operating income and operating income margins from 2018 to 2020. ***.

Interest expense, other expenses and income, and net income or loss

Classified below the operating income level are interest expense, other expense, and other income. In table VI-1, these items are aggregated and only the net amount is shown. The net amount increased from 2018 to 2020. Net other expenses/income represented just 0.9 percent of total costs and expenses during the period for which data were requested. ***.[17]

On an overall basis and similar to the trend in operating income, net income declined from $29.1 million in 2018 to negative $6.7 million in 2019 then increased to $1.5 million in 2020. The net income margins (net income as a share of net sales) declined from 1.4 percent in 2018 to negative 0.3 percent in 2019 then increased to 0.1 percent in 2020. Table VI-3 shows that all U.S. producers except *** reported an overall declining net income and net income margin from 2018 to 2020. ***. Table VI-5 presents the U.S. producers' narrative responses regarding effects on financial performance of COVID-19.

[17] U.S. producers' questionnaire responses of ***, question III-10.

Table VI-5
SRC pipe and tube: Narrative responses relating to COVID-19 pandemic effects on U.S. producers' financial performance, by firm

Firm	Narrative
Cambridge	***
Cerro	***
GD Copper	***
H&H	***
Mueller	***
Wieland	***

Source: Compiled from data submitted in response to Commission questionnaires.

Variance analysis

A variance analysis for the operations of U.S. producers of SRC pipe and tube is presented in table VI-6.[18] The information for this variance analysis is derived from table VI-1.

Table VI-6
SRC pipe and tube: Variance analysis on the operations of U.S. producers between comparison periods

Values in 1,000 dollars

Item	2018-20	2018-19	2019-20
Net sales price variance	(91,570)	(115,647)	15,630
Net sales volume variance	(226,012)	(76,392)	(141,173)
Net sales total variance	(317,582)	(192,039)	(125,543)
COGS price variance	74,272	88,641	(7,894)
COGS volume variance	208,080	70,331	131,274
COGS total variance	282,352	158,972	123,380
Gross profit variance	(35,230)	(33,067)	(2,163)
SG&A price variance	(1,590)	(5,563)	3,567
SG&A volume variance	13,273	4,486	9,193
SG&A total variance	11,683	(1,077)	12,760
Operating income price variance	(91,570)	(115,647)	15,630
Operating income cost variance	72,683	83,078	(4,327)
Operating income volume variance	(4,659)	(1,575)	(705)
Operating income total variance	(23,547)	(34,144)	10,597

Source: Compiled from data submitted in response to Commission questionnaires.

[18] The Commission's variance analysis is calculated in three parts: Net sales variance, cost of sales variance (COGS variance), and SG&A expense variance. Each part consists of a price variance (in the case of the sales variance) or a cost or expense variance (in the case of the COGS and SG&A expense variance), and a volume variance. The net sales or cost/expense variance is calculated as the change in unit price or per-unit cost/expense times the new volume, while the volume variance is calculated as the change in volume times the old unit price or per-unit cost/expense. Summarized at the operating income level, the price variance is from net sales; the cost/expense variance is the sum of those items from COGS and SG&A variances, respectively, and the volume variance is the sum of the volume components of the net sales, COGS, and SG&A expense variances. The overall volume component of the variance analysis is generally small.

Capital expenditures and research and development expenses

Table VI-7 presents capital expenditures, by firm, and table VI-9 presents research and development ("R&D") expenses, by firm. Tables VI-8 and VI-10 present the firms' narrative explanations of the nature, focus, and significance of their capital expenditures and R&D expenses, respectively.

Table VI-7
SRC pipe and tube: U.S. producers' capital expenditures, by firm and period

Values in 1,000 dollars

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	18,443	29,707	20,523

Note: ***. Email from ***, May 19, 2021.

Source: Compiled from data submitted in response to Commission questionnaires.

Table VI-8
SRC pipe and tube: Narrative description of U.S. producers' capital expenditures, by firm

Firm	Narrative
Cambridge	***
Cerro	***
GD Copper	***
H&H	***
Mueller	***
Wieland	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table VI-9
SRC pipe and tube: U.S. producers' R&D expenses, by firm and period

Values in 1,000 dollars

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table VI-10
SRC pipe and tube: Narrative description of U.S. producers' R&D expenses, by firm

Firm	Narrative
Cambridge	***
Cerro	***
GD Copper	***
H&H	***
Mueller	***
Wieland	***

Source: Compiled from data submitted in response to Commission questionnaires.

Assets and return on assets

Table VI-11 presents data on the U.S. producers' total assets while table VI-12 presents their return on assets ("ROA"). Table VI-13 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time.[19]

Table VI-11
SRC pipe and tube: U.S. producers' total net assets, by firm and period

Values in 1,000 dollars

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	722,784	705,095	667,978

Source: Compiled from data submitted in response to Commission questionnaires.

Table VI-12
SRC pipe and tube: U.S. producers' ROA, by firm and period

Ratio in percent

Firm	2018	2019	2020
Cambridge	***	***	***
Cerro	***	***	***
GD Copper	***	***	***
H&H	***	***	***
Mueller	***	***	***
Wieland	***	***	***
All firms	6.1	1.4	3.0

Source: Compiled from data submitted in response to Commission questionnaires.

[19] The ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value for SRC pipe and tube

Table VI-13
SRC pipe and tube: Narrative descriptions of U.S. producers' total net assets, by firm

Firm	Narrative
Cambridge	***
Cerro	***
GD Copper	***
H&H	***
Mueller	***
Wieland	***

Source: Compiled from data submitted in response to Commission questionnaires.

Capital and investment

The Commission requested U.S. producers of SRC pipe and tube to describe any actual or potential negative effects of imports of SRC pipe and tube from Vietnam on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table VI-14 presents the number of firms reporting an impact in each category. Table VI-15 provides the U.S. producers' narrative responses relating to actual negative effects of imports on investment, growth, and development and table VI-16 provides the U.S. producers' narrative responses relating to anticipated negative effects of imports.

Table VI-14
SRC pipe and tube: Count of firms indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2018, by effect

Number of firms reporting

Item	Category	Count
Any negative effects on investment	Investment	3
Cancellation, postponement, or rejection of expansion projects	Investment	1
Denial or rejection of investment proposal	Investment	0
Reduction in the size of capital investments	Investment	2
Return on specific investments negatively impacted	Investment	2
Other investment effects	Investment	1
Any negative effects on growth and development	Growth	2
Rejection of bank loans	Growth	0
Lowering of credit rating	Growth	0
Problem related to the issue of stocks or bonds	Growth	0
Ability to service debt	Growth	0
Other growth and development effects	Growth	2
Anticipated negative effects of imports	Future	4

Source: Compiled from data submitted in response to Commission questionnaires.

Table VI-15
SRC pipe and tube: Narratives relating to actual negative effects of imports on investment, growth, and development, since January 1, 2018

Item	Firm	Narrative response
Cancellation, postponement, or rejection of expansion projects	***	***
Reduction in the size of capital investments	***	***
Reduction in the size of capital investments	***	***
Return on specific investments negatively impacted	***	***
Return on specific investments negatively impacted	***	***
Other negative effects on investments	***	***
Other effects on growth and development	***	***
Other effects on growth and development	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table VI-16
SRC pipe and tube: Narratives relating to anticipated negative effects of imports, since January 1, 2018

Firm	Narrative response
***	***
***	***
***	***
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Part VII: Threat considerations and information on nonsubject countries

Section 771(7)(F)(i) of the Act (19 U.S.C. § 1677(7)(F)(i)) provides that—

> *In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors*[1]*--*
>
> *(I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,*
>
> *(II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,*
>
> *(III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,*
>
> *(IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports,*
>
> *(V) inventories of the subject merchandise,*

---

[1] Section 771(7)(F)(ii) of the Act (19 U.S.C. § 1677(7)(F)(ii)) provides that "The Commission shall consider {these factors} . . . as a whole in making a determination of whether further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted under this title. The presence or absence of any factor which the Commission is required to consider . . . shall not necessarily give decisive guidance with respect to the determination. Such a determination may not be made on the basis of mere conjecture or supposition."

(VI) the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products,

(VII) in any investigation under this title which involves imports of both a raw agricultural product (within the meaning of paragraph (4)(E)(iv)) and any product processed from such raw agricultural product, the likelihood that there will be increased imports, by reason of product shifting, if there is an affirmative determination by the Commission under section 705(b)(1) or 735(b)(1) with respect to either the raw agricultural product or the processed agricultural product (but not both),

(VIII) the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and

(IX) any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).[2]

Information on the volume and pricing of imports of the subject merchandise is presented in *Parts IV* and *V*; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in *Part VI*. Information on inventories of the subject merchandise; foreign producers' operations, including the potential for "product-shifting;" any other threat indicators, if applicable; and any dumping in third-country markets, follows. Also presented in this section of the report is information obtained for consideration by the Commission on nonsubject countries.

[2] Section 771(7)(F)(iii) of the Act (19 U.S.C. § 1677(7)(F)(iii)) further provides that, in antidumping investigations, ". . . the Commission shall consider whether dumping in the markets of foreign countries (as evidenced by dumping findings or antidumping remedies in other WTO member markets against the same class or kind of merchandise manufactured or exported by the same party as under investigation) suggests a threat of material injury to the domestic industry."

The industry in Vietnam

The Commission issued questionnaires to five firms believed to produce and/or export SRC pipe and tube from Vietnam,[3] and received two responses. Toan Phat reported production of SRC pipe and tube in Vietnam as well as exportation of SRC pipe and tube manufactured by Vietnamese producers ***. Summit Tech reported exportation of SRC pipe and tube ***. Toan Phat estimates it accounts for *** percent of production in Vietnam in 2020.

According to the petitioner, the SRC pipe and tube industry in Vietnam has substantial production capacity. The petitioner notes that Hailiang established a plant in Vietnam in 2010 with 71,000 metric tons of capacity, and JinTian (another Chinese-owned company) reportedly installed 30,000 metric tons of copper tube capacity in 2018.[4] Responding producer Toan Phat's capacity increased by *** percent during 2018-20 following completion of its second manufacturing facility in Vietnam.

Table VII-1
SRC pipe and tube: Summary data on the Vietnamese producer Toan Phat, 2020

Firm	Production (1,000 pounds)	Share of reported production (percent)	Exports to the United States (1,000 pounds)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds)	Share of firm's total shipments exported to the United States (percent)
Toan Phat	***	***	***	***	***	***
All firms	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

[3] These firms were identified through a review of information submitted in the petition.
[4] Petitioner's prehearing brief, p. 28.

Table VII-2
SRC pipe and tube: Summary data on resellers in Vietnam, 2020

Resellers	Resales exported to the United States (1,000 pounds)	Share of resales to the United States (Percent)
Summit	***	***
Toan Phat	***	***
All firms	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Changes in operations

As presented in table VII-3, Toan Phat reported one change, a plant opening, since January 1, 2018.

Table VII-3
SRC pipe and tube: Reported changes in operations by Vietnamese producer Toan Phat, since January 1, 2018

Item	Firm name and accompanying narrative response
Plant openings	***

Source: Compiled from data submitted in response to Commission questionnaires.

Operations on SRC pipe and tube

Table VII-4 presents information on Toan Phat's SRC pipe and tube operations. Following completion of a second manufacturing facility, Toan Phat's capacity increased by *** percent during 2018-20 while its production decreased by *** percent in the same period.[5] Capacity is projected to remain constant from 2020 to 2022, while production is projected to increase by *** percent from 2020 to 2022. As production decreased while capacity increased from 2018 to 2020, capacity utilization decreased by *** percentage points. Toan Phat projected its capacity utilization to increase by *** percentage points during 2020-22. Toan Phat's end-of-period inventories decreased by *** percent during 2018-20 but are projected to increase by *** percent from 2020 to 2022.

Total home market shipments increased from *** percent to *** percent of total shipments from 2018 to 2020, while Toan Phat's direct export shipments to the United States

[5] Toan Phat did not report ***.

increased irregularly from *** to *** percent of total shipments during the same period.[6] The firm's exports to the United States decreased by *** percent during 2018-20, while exports to all other markets decreased by *** percent during the same period. Toan Phat projected a *** percent increase in total direct export shipments during 2020-22, with a *** percent increase in export shipments to all other markets during the same period but a *** percent decrease in direct export shipments to the United States. The firm's reported bases of its projections are ***.[7]

Table VII-4
SRC pipe and tube: Data on Vietnamese producer Toan Phat, by period

Quantity in 1,000 pounds

Item	2018	2019	2020	Projection 2021	Projection 2022
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Internal consumption	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Home market shipments	***	***	***	***	***
Exports to the United States	***	***	***	***	***
Exports to all other markets	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***

Table continued on next page.

[6] Toan Phat reported ***.

[7] Although Toan Phat projected ***, according to its website its second facility targeted manufacturing output of 25,000 MT (approximately 55.1 million pounds) from 2018 to 2020, and is targeting 50,000 MT (approximately 110.2 million pounds) from "2020 onwards". See https://www.rubycopper.vn/about.html.

Table VII-4--Continued
SRC pipe and tube: Data on Vietnamese producer Toan Phat, by period

Shares and ratios in percent

Item	2018	2019	2020	Projection 2021	Projection 2022
Capacity utilization ratio	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***
Internal consumption share	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***
Home market shipments share	***	***	***	***	***
Exports to the United States share	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***
Export shipments share	***	***	***	***	***
Total shipments share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Exports

According to GTA, the leading export markets for tubes and pipes of refined copper (including products outside of the scope of this investigation) from Vietnam are India, the United States, and China (table VII-5).[8] During 2020, exports to India under HS subheading 7411.10 accounted for 29.1 percent of Vietnam's exports of tubes and pipes of refined copper, exports to the United States accounted for 28.1 percent, and exports to China accounted for 15.0 percent. According to GTA, Vietnam was the second largest global exporter of tubes and pipes of refined copper, by value, in 2020 (table VII-14).

[8] All tubes and pipes of refined copper are classified in HS subheading 7411.10, including products that fall outside of the scope of this investigation because they do not meet the product dimensions described in the scope and/or because the pipe and tube are welded (not seamless).

Table VII-5
Tubes and pipes of refined copper: Quantity and value of exports from Vietnam by destination market, 2018-20

Quantity in 1,000 pounds; Value in 1,000 dollars

Destination market	Measure	2018	2019	2020
United States	Quantity	40,418	44,652	64,313
India	Quantity	59,282	84,558	66,542
China	Quantity	25,101	33,483	34,207
Korea	Quantity	9,337	10,672	19,009
United Kingdom	Quantity	6,885	10,008	7,374
Brazil	Quantity	4,744	6,115	7,200
Australia	Quantity	5,919	4,466	5,349
Russia	Quantity	67	680	4,310
Thailand	Quantity	1,609	4,390	3,810
All other destination markets	Quantity	12,871	16,336	16,355
All destination markets	Quantity	166,234	215,360	228,470
United States	Value	138,110	146,513	202,874
India	Value	204,574	269,922	208,379
China	Value	71,722	88,032	89,680
Korea	Value	31,412	33,251	58,488
United Kingdom	Value	23,248	30,976	23,274
Brazil	Value	16,866	20,159	22,667
Australia	Value	23,638	17,138	17,723
Russia	Value	286	2,313	13,610
Thailand	Value	5,524	13,486	11,115
All other destination markets	Value	44,071	51,018	52,367
All destination markets	Value	559,451	672,809	700,179

Table continued on next page.

Table VII-5—Continued
Tubes and pipes of refined copper: Unit value and share of quantity from Vietnam by destination market, 2018-20

Unit values in dollars per 1,000 pounds; Shares in percent

Destination market	Measure	2018	2019	2020
United States	Unit value	3,417	3,281	3,154
India	Unit value	3,451	3,192	3,132
China	Unit value	2,857	2,629	2,622
Korea	Unit value	3,364	3,116	3,077
United Kingdom	Unit value	3,376	3,095	3,156
Brazil	Unit value	3,555	3,296	3,148
Australia	Unit value	3,993	3,837	3,314
Russia	Unit value	4,235	3,402	3,158
Thailand	Unit value	3,433	3,072	2,918
All other destination markets	Unit value	3,424	3,123	3,202
All destination markets	Unit value	3,365	3,124	3,065
United States	Share of quantity	24.3	20.7	28.1
India	Share of quantity	35.7	39.3	29.1
China	Share of quantity	15.1	15.5	15.0
Korea	Share of quantity	5.6	5.0	8.3
United Kingdom	Share of quantity	4.1	4.6	3.2
Brazil	Share of quantity	2.9	2.8	3.2
Australia	Share of quantity	3.6	2.1	2.3
Russia	Share of quantity	0.0	0.3	1.9
Thailand	Share of quantity	1.0	2.0	1.7
All other destination markets	Share of quantity	7.7	7.6	7.2
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official imports statistics of imports from Vietnam (constructed export statistics for Vietnam) under HS subheading 7411.10 as reported by various statistical reporting authorities in the Global Trade Atlas database, accessed April 16, 2021.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2020 data.

U.S. inventories of imported merchandise

Table VII-6 presents data on U.S. importers' reported inventories of SRC pipe and tube. Inventories of imports from Vietnam increased by *** percent from 2018 to 2020 due to increases in inventories reported in each period by ***. Inventories of imports from nonsubject sources increased by *** percent from 2018 to 2020.

Table VII-6
SRC pipe and tube: U.S. importers' end-of-period inventories of imports by source and period

Quantity in 1,000 pounds; Ratios in percent

Measure	Source	2018	2019	2020
Inventories quantity	Vietnam	***	***	***
Ratio to imports	Vietnam	***	***	***
Ratio to U.S. shipments of imports	Vietnam	***	***	***
Ratio to total shipmemts of imports	Vietnam	***	***	***
Inventories quantity	Nonsubject	***	***	***
Ratio to imports	Nonsubject	***	***	***
Ratio to U.S. shipments of imports	Nonsubject	***	***	***
Ratio to total shipmemts of imports	Nonsubject	***	***	***
Inventories quantity	All	13,536	14,386	24,082
Ratio to imports	All	12.0	14.2	20.3
Ratio to U.S. shipments of imports	All	12.9	14.6	22.5
Ratio to total shipmemts of imports	All	12.8	14.3	22.1

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of SRC pipe and tube from Vietnam after December 31, 2020. Such arranged imports are reported in table VII-7.

Table VII-7
SRC pipe and tube: Arranged imports, January 2021 through December 2021

Quantity in 1,000 pounds

Source	Jan-Mar 2021	Apr-Jun 2021	Jul-Sept 2021	Oct-Dec 2021	Total
Vietnam	***	***	***	***	***
Nonsubect sources	***	***	***	***	***
All import sources	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Antidumping or countervailing duty orders in third-country markets

Several countries maintain trade remedies covering SRC pipe and tube from Vietnam or from other sources. Antidumping duty orders in Canada cover copper tube from Brazil, China, Greece, Mexico, and Korea, while a Canadian countervailing duty order covers copper tube from China. Canada's orders include seamless and welded copper tube; however, they cover a narrower range of seamless tube than what is covered in the scope of the current investigation. In Canada's orders, the OD of the subject product is limited to 0.2 inch to 4.25 inches (0.502 centimeter to 10.795 centimeters), and industrial and coated or insulated copper tube are excluded from the orders.[9]

Antidumping duty orders in Turkey cover copper tubes and pipes from Greece. The duty is set at 5 percent for Halcor and 9 percent for all other companies.[10] No description of the subject product was available beyond "tubes and pipes of refined copper."

Australia and India had ongoing investigations into imports of copper pipe and tube from Vietnam. In March 2021, Australia initiated an antidumping investigation into seamless copper tube from Vietnam with an outside nominal diameter between 9.52 millimeters and 53.98 millimeters and a nominal wall thickness between 0.71 mm and 1.83 mm. A final recommendation was scheduled for August 24, 2021.[11] In September 2020, India began a countervailing duty investigation into imports of copper tubes and pipes from Malaysia, Thailand, and Vietnam. No description of the subject product was available beyond "copper tubes and pipes" classified under customs headings 7411.10.00, 7411.21.00, 7411.22.00, and 7411.29.00 and no date for a final determination was provided.[12]

---

[9] Canada Border Services Agency, "Certain Copper Tube," accessed March 30, 2021, https://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev/ct-eng.html. The antidumping duty is set at 82.4 percent of the export price for copper tube originating in/or exported from Brazil, China, Greece, Mexico, and Korea. The countervailing duty is set at 25,239 Renminbi per metric ton for copper tube originating in/or exported from China.

[10] European Commission, "Actions against Exports from the EU: Cases: Non-EU markets," http://trade.ec.europa.eu/actions-against-eu-exporters/cases/case_details.cfm?id=10722.

[11] Department of Industry, Science, Energy, and Resources of the Australian Government, "580: Investigation – Dumping: Copper tube from Vietnam," accessed June 24, 2021, https://www.industry.gov.au/regulations-and-standards/anti-dumping-and-countervailing-system/anti-dumping-commission-current-cases/580.

[12] Directorate General of Trade Remedies of the Government of India, "Initiation of countervailing duty investigation concerning imports of copper tubes and pipes from Malaysia, Thailand and Vietnam," accessed June 24, 2021, https://www.dgtr.gov.in/countervailing-duty-investigation/initiation-countervailing-duty-investigation-concerning-imports-0.

Information on nonsubject countries

Canada

In 2020, the United States was the top destination market for tubes and pipes of refined copper (including products outside of the scope of this investigation) from Canada, accounting for 99.4 percent of Canada's tubes and pipes of refined copper exports under HS subheading 7411.10, by quantity (table VII-8).[13] According to GTA, Canada was the ninth largest global exporter of tubes and pipes of refined copper, by value, in 2020 (table VII-14).

[13] All tubes and pipes of refined copper are classified in HS subheading 7411.10, including products that fall outside of the scope of this investigation because they do not meet the product dimensions described in the scope and/or because the pipe and tube are welded (not seamless).

Table VII-8
SRC pipe and tube: Quantity and value of exports from Canada by destination market, 2018-20

Quantity in 1,000 pounds; Value in 1,000 dollars

Destination market	Measure	2018	2019	2020
United States	Quantity	27,865	29,659	29,248
Ethiopia	Quantity	---	153	80
India	Quantity	---	0	46
Sweden	Quantity	23	13	19
United Kingdom	Quantity	11	6	12
France	Quantity	16	25	8
Poland	Quantity	6	4	5
Australia	Quantity	---	---	4
New Zealand	Quantity	4	3	3
All other destination markets	Quantity	247	191	5
All destination markets	Quantity	28,172	30,054	29,431
United States	Value	116,764	121,259	134,630
Ethiopia	Value	---	470	242
India	Value	---	0	140
Sweden	Value	73	39	57
United Kingdom	Value	34	21	37
France	Value	55	77	23
Poland	Value	19	21	17
Australia	Value	---	---	12
New Zealand	Value	13	9	8
All other destination markets	Value	909	887	15
All destination markets	Value	117,867	122,783	135,181

Table continued on next page.

Table VII-8--Continued
SRC pipe and tube: Unit value and share of quantity from Canada by destination market, 2018-20

Unit values in dollars per 1,000 pounds; Shares in percent

Destination market	Measure	2018	2019	2020
United States	Unit value	4,190	4,088	4,603
Ethiopia	Unit value	---	3,076	3,013
India	Unit value	---	3,182	3,024
Sweden	Unit value	3,132	3,076	3,041
United Kingdom	Unit value	3,143	3,232	3,022
France	Unit value	3,496	3,073	3,016
Poland	Unit value	3,223	5,277	3,082
Australia	Unit value	---	---	2,928
New Zealand	Unit value	3,063	2,864	3,040
All other destination markets	Unit value	3,675	4,651	3,041
All destination markets	Unit value	4,184	4,085	4,593
United States	Share of quantity	98.9	98.7	99.4
Ethiopia	Share of quantity	---	0.5	0.3
India	Share of quantity	---	0.0	0.2
Sweden	Share of quantity	0.1	0.0	0.1
United Kingdom	Share of quantity	0.0	0.0	0.0
France	Share of quantity	0.1	0.1	0.0
Poland	Share of quantity	0.0	0.0	0.0
Australia	Share of quantity	---	---	0.0
New Zealand	Share of quantity	0.0	0.0	0.0
All other destination markets	Share of quantity	0.9	0.6	0.0
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7411.10 as reported by Statistics Canada in the Global Trade Atlas database, accessed May 1, 2021.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2020 data.

China[14]

In 2020, Thailand and Taiwan were the top destination markets for tubes and pipes of refined copper (including products outside of the scope of this investigation) from China, accounting for 21.3 and 12.4 percent of China's tubes and pipes of refined copper exports under HS subheading 7411.10, by quantity, respectively (table VII-9).[15] Vietnam was the fourteen leading destination market for tubes and pipes of refined copper from China in 2020, and accounted for 1.4 percent (4.9 million pounds) of China's tubes and pipes of refined copper exports under HS subheading 7411.10, by quantity. According to GTA, China was the leading global exporter of tubes and pipes of refined copper (including products outside of the scope of this investigation), by value, in 2020 (table VII-14).

[14] As discussed in Part I, since November 22, 2010, Commerce has administered antidumping duty orders on SRC pipe and tube from China.

[15] All tubes and pipes of refined copper are classified in HS subheading 7411.10, including products that fall outside of the scope of this investigation because they do not meet the product dimensions described in the scope and/or because the pipe and tube are welded (not seamless).

Table VII-9
SRC pipe and tube: Quantity and value of exports from China by destination market, 2018-20

Quantity in 1,000 pounds; Value in 1,000 dollars

Destination market	Measure	2018	2019	2020
United States	Quantity	3,242	3,700	4,864
Thailand	Quantity	60,486	73,829	76,204
Taiwan	Quantity	44,283	40,690	44,380
Malaysia	Quantity	33,020	30,744	27,572
Japan	Quantity	20,890	29,622	27,313
Indonesia	Quantity	17,953	19,098	18,989
Australia	Quantity	11,873	13,377	15,447
Korea	Quantity	16,547	16,949	14,219
Egypt	Quantity	9,446	11,349	12,145
All other destination markets	Quantity	122,720	136,258	117,039
All destination markets	Quantity	340,460	375,616	358,171
United States	Value	15,860	16,299	20,595
Thailand	Value	209,280	236,886	234,615
Taiwan	Value	151,645	129,182	136,370
Malaysia	Value	114,587	101,266	88,101
Japan	Value	75,807	99,784	89,481
Indonesia	Value	61,994	61,783	60,124
Australia	Value	42,441	44,024	50,479
Korea	Value	60,363	55,375	45,013
Egypt	Value	31,753	35,479	37,910
All other destination markets	Value	433,110	441,846	377,648
All destination markets	Value	1,196,840	1,221,925	1,140,336

Table continued on next page.

Table VII-9--Continued
SRC pipe and tube: Unit value and share of quantity from China by destination market, 2018-20

Unit values in dollars per 1,000 pounds; Shares in percent

Destination market	Measure	2018	2019	2020
United States	Unit value	4,893	4,406	4,235
Thailand	Unit value	3,460	3,209	3,079
Taiwan	Unit value	3,424	3,175	3,073
Malaysia	Unit value	3,470	3,294	3,195
Japan	Unit value	3,629	3,369	3,276
Indonesia	Unit value	3,453	3,235	3,166
Australia	Unit value	3,575	3,291	3,268
Korea	Unit value	3,648	3,267	3,166
Egypt	Unit value	3,362	3,126	3,121
All other destination markets	Unit value	3,529	3,243	3,227
All destination markets	Unit value	3,515	3,253	3,184
United States	Share of quantity	1.0	1.0	1.4
Thailand	Share of quantity	17.8	19.7	21.3
Taiwan	Share of quantity	13.0	10.8	12.4
Malaysia	Share of quantity	9.7	8.2	7.7
Japan	Share of quantity	6.1	7.9	7.6
Indonesia	Share of quantity	5.3	5.1	5.3
Australia	Share of quantity	3.5	3.6	4.3
Korea	Share of quantity	4.9	4.5	4.0
Egypt	Share of quantity	2.8	3.0	3.4
All other destination markets	Share of quantity	36.0	36.3	32.7
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7411.10 as reported by China Customs in the Global Trade Atlas database, accessed May 1, 2021.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2020 data.

Greece

In 2020, the United Kingdom, France, and Italy were the top destination markets for tubes and pipes of refined copper (including products outside of the scope of this investigation) from Greece, accounting for 13.5, 12.4, and 12.0 percent of Greece's tubes and pipes of refined copper exports under HS subheading 7411.10, by quantity, respectively (table VII-10).[16] According to GTA, Greece was the third largest global exporter of tubes and pipes of refined copper, by value, in 2020 (table VII-14).

Table VII-10
SRC pipe and tube: Quantity and value of exports from Greece by destination market, 2018-20

Quantity in 1,000 pounds; Value in 1,000 dollars

Destination market	Measure	2018	2019	2020
United States	Quantity	10,780	6,426	7,065
United Kingdom	Quantity	22,944	22,360	20,812
France	Quantity	18,151	18,939	19,040
Italy	Quantity	20,205	19,366	18,514
Germany	Quantity	14,425	14,256	15,822
Spain	Quantity	13,091	13,078	11,960
Turkey	Quantity	8,079	8,716	8,813
Israel	Quantity	4,928	5,382	6,232
Serbia	Quantity	2,809	2,836	5,407
All other destination markets	Quantity	35,567	40,573	40,446
All destination markets	Quantity	150,978	151,930	154,112
United States	Value	36,903	20,631	22,559
United Kingdom	Value	76,489	68,552	67,472
France	Value	63,330	60,412	62,746
Italy	Value	72,584	62,519	61,859
Germany	Value	51,280	46,566	51,784
Spain	Value	45,299	42,521	39,768
Turkey	Value	29,021	29,172	29,768
Israel	Value	16,052	16,495	19,825
Serbia	Value	7,028	6,830	15,329
All other destination markets	Value	128,494	136,165	135,039
All destination markets	Value	526,480	489,863	506,150

Table continued on next page.

[16] All tubes and pipes of refined copper are classified in HS subheading 7411.10, including products that fall outside of the scope of this investigation because they do not meet the product dimensions described in the scope and/or because the pipe and tube are welded (not seamless).

Table VII-10--Continued
SRC pipe and tube: Unit value and share of quantity from Greece by destination market, 2018-20

Unit values in dollars per 1,000 pounds; Shares in percent

Destination market	Measure	2018	2019	2020
United States	Unit value	3,423	3,211	3,193
United Kingdom	Unit value	3,334	3,066	3,242
France	Unit value	3,489	3,190	3,295
Italy	Unit value	3,592	3,228	3,341
Germany	Unit value	3,555	3,266	3,273
Spain	Unit value	3,460	3,251	3,325
Turkey	Unit value	3,592	3,347	3,378
Israel	Unit value	3,257	3,065	3,181
Serbia	Unit value	2,502	2,409	2,835
All other destination markets	Unit value	3,613	3,356	3,339
All destination markets	Unit value	3,487	3,224	3,284
United States	Share of quantity	7.1	4.2	4.6
United Kingdom	Share of quantity	15.2	14.7	13.5
France	Share of quantity	12.0	12.5	12.4
Italy	Share of quantity	13.4	12.7	12.0
Germany	Share of quantity	9.6	9.4	10.3
Spain	Share of quantity	8.7	8.6	7.8
Turkey	Share of quantity	5.4	5.7	5.7
Israel	Share of quantity	3.3	3.5	4.0
Serbia	Share of quantity	1.9	1.9	3.5
All other destination markets	Share of quantity	23.6	26.7	26.2
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7411.10 as reported by Eurostat in the Global Trade Atlas database, accessed May 1, 2021.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2020 data.

Korea

In 2020, the United States and Australia were the top destination markets for tubes and pipes of refined copper (including products outside of the scope of this investigation) from Korea, accounting for 31.6 and 12.4 percent of Korea's tubes and pipes of refined copper exports under HS subheading 7411.10, by quantity, respectively (table VII-11).[17] According to GTA, Korea was the seventh largest global exporter of tubes and pipes of refined copper, by value, in 2020 (table VII-14).

Table VII-11
SRC pipe and tube: Quantity and value of exports from Korea by destination market, 2018-20

Quantity in 1,000 pounds; Value in 1,000 dollars

Destination market	Measure	2018	2019	2020
United States	Quantity	23,958	21,714	25,065
Australia	Quantity	12,088	12,851	9,801
United Kingdom	Quantity	4,958	5,530	6,114
Thailand	Quantity	4,105	4,002	4,648
United Arab Emirates	Quantity	4,187	4,715	4,148
Saudi Arabia	Quantity	3,788	4,121	3,413
Turkey	Quantity	34	309	3,080
China	Quantity	5,372	4,163	2,744
Hong Kong	Quantity	3,346	3,255	2,619
All other destination markets	Quantity	25,091	21,707	17,587
All destination markets	Quantity	86,929	82,365	79,220
United States	Value	83,351	70,983	83,587
Australia	Value	41,254	40,939	31,023
United Kingdom	Value	16,340	17,150	19,997
Thailand	Value	15,357	13,437	16,104
United Arab Emirates	Value	14,551	15,092	13,304
Saudi Arabia	Value	13,124	12,940	10,677
Turkey	Value	151	1,052	9,583
China	Value	18,918	13,884	8,594
Hong Kong	Value	12,104	10,872	8,532
All other destination markets	Value	88,307	71,692	57,464
All destination markets	Value	303,457	268,041	258,866

Table continued on next page.

[17] All tubes and pipes of refined copper are classified in HS subheading 7411.10, including products that fall outside of the scope of this investigation because they do not meet the product dimensions described in the scope and/or because the pipe and tube are welded (not seamless).

Table VII-11--Continued
SRC pipe and tube: Unit value and share of quantity from Korea by destination market, 2018-20

Unit values in dollars per 1,000 pounds; Shares in percent

Destination market	Measure	2018	2019	2020
United States	Unit value	3,479	3,269	3,335
Australia	Unit value	3,413	3,186	3,165
United Kingdom	Unit value	3,296	3,101	3,270
Thailand	Unit value	3,741	3,358	3,465
United Arab Emirates	Unit value	3,475	3,201	3,207
Saudi Arabia	Unit value	3,465	3,140	3,129
Turkey	Unit value	4,393	3,408	3,111
China	Unit value	3,521	3,335	3,132
Hong Kong	Unit value	3,617	3,341	3,258
All other destination markets	Unit value	3,519	3,303	3,267
All destination markets	Unit value	3,491	3,254	3,268
United States	Share of quantity	27.6	26.4	31.6
Australia	Share of quantity	13.9	15.6	12.4
United Kingdom	Share of quantity	5.7	6.7	7.7
Thailand	Share of quantity	4.7	4.9	5.9
United Arab Emirates	Share of quantity	4.8	5.7	5.2
Saudi Arabia	Share of quantity	4.4	5.0	4.3
Turkey	Share of quantity	0.0	0.4	3.9
China	Share of quantity	6.2	5.1	3.5
Hong Kong	Share of quantity	3.8	4.0	3.3
All other destination markets	Share of quantity	28.9	26.4	22.2
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7411.10 as reported by Korea Trade Statistics Promotion Institute (KTSPI) in the Global Trade Atlas database, accessed May 1, 2021.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2020 data.

Mexico[18]

In 2020, the United States was the top destination market for tubes and pipes of refined copper (including products outside of the scope of this investigation) from Mexico, accounting for 83.0 percent of Mexico's tubes and pipes of refined copper exports under HS subheading 7411.10, by quantity (table VII-12).[19] According to GTA, Mexico was not one of the twelve leading exporters of tubes and pipes of refined copper in 2020 (table VII-14).

Table VII-12
SRC pipe and tube: Quantity and value of exports from Mexico by destination market, 2018-20

Quantity in 1,000 pounds; Value in 1,000 dollars

Destination market	Measure	2018	2019	2020
United States	Quantity	12,438	61,111	13,610
Chile	Quantity	2,417	---	1,216
Colombia	Quantity	6,107	1,959	1,151
Peru	Quantity	1,023	214	215
Panama	Quantity	1,041	155	166
Nicaragua	Quantity	69	---	19
El Salvador	Quantity	159	84	19
Venezuela	Quantity	123	---	---
Uruguay	Quantity	66	---	---
All other destination markets	Quantity	26,619	136	---
All destination markets	Quantity	50,062	63,659	16,396
United States	Value	46,476	53,379	52,806
Chile	Value	8,403	---	3,941
Colombia	Value	20,694	6,120	3,702
Peru	Value	3,397	640	654
Panama	Value	3,679	485	552
Nicaragua	Value	274	---	58
El Salvador	Value	585	273	64
Venezuela	Value	446	---	---
Uruguay	Value	242	---	---
All other destination markets	Value	92,860	455	---
All destination markets	Value	177,056	61,353	61,777

Table continued on next page.

[18] As discussed in Part I, since November 22, 2010, Commerce has administered antidumping duty orders on SRC pipe and tube from Mexico.

[19] All tubes and pipes of refined copper are classified in HS subheading 7411.10, including products that fall outside of the scope of this investigation because they do not meet the product dimensions described in the scope and/or because the pipe and tube are welded (not seamless).

Table VII-12--Continued
SRC pipe and tube: Unit value and share of quantity from Mexico by destination market, 2018-20

Unit values in dollars per 1,000 pounds; Shares in percent

Destination market	Measure	2018	2019	2020
United States	Unit value	3,737	873	3,880
Chile	Unit value	3,477	---	3,241
Colombia	Unit value	3,388	3,124	3,216
Peru	Unit value	3,321	2,984	3,046
Panama	Unit value	3,534	3,129	3,323
Nicaragua	Unit value	3,978	---	3,027
El Salvador	Unit value	3,676	3,264	3,430
Venezuela	Unit value	3,636	---	---
Uruguay	Unit value	3,692	---	---
All other destination markets	Unit value	3,488	3,342	---
All destination markets	Unit value	3,537	964	3,768
United States	Share of quantity	24.8	96.0	83.0
Chile	Share of quantity	4.8	---	7.4
Colombia	Share of quantity	12.2	3.1	7.0
Peru	Share of quantity	2.0	0.3	1.3
Panama	Share of quantity	2.1	0.2	1.0
Nicaragua	Share of quantity	0.1	---	0.1
El Salvador	Share of quantity	0.3	0.1	0.1
Venezuela	Share of quantity	0.2	---	---
Uruguay	Share of quantity	0.1	---	---
All other destination markets	Share of quantity	53.2	0.2	---
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7411.10 as reported by INEGI in the Global Trade Atlas database, accessed May 1, 2021.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2020 data.

Thailand

In 2020, Japan and the United States was the top destination markets for tubes and pipes of refined copper (including products outside of the scope of this investigation) from Thailand, accounting for 23.4 and 19.3 percent of Thailand's tubes and pipes of refined copper exports under HS subheading 7411.10, by quantity, respectively (table VII-13).[20] According to GTA, Thailand was the sixth largest global exporter of tubes and pipes of refined copper, by value, in 2020 (table VII-14).

Table VII-13
SRC pipe and tube: Quantity and value of exports from Thailand by destination market, 2018-20

Quantity in 1,000 pounds; Value in 1,000 dollars

Destination market	Measure	2018	2019	2020
United States	Quantity	1,107	2,273	13,591
Japan	Quantity	19,331	19,344	16,437
India	Quantity	9,505	9,507	7,900
Vietnam	Quantity	6,561	9,720	6,535
Malaysia	Quantity	8,169	7,755	6,112
Czech Republic	Quantity	3,559	4,133	3,212
United Kingdom	Quantity	3,270	3,355	3,056
China	Quantity	572	435	2,207
Indonesia	Quantity	2,222	2,093	1,850
All other destination markets	Quantity	11,789	9,796	9,358
All destination markets	Quantity	66,087	68,412	70,257
United States	Value	4,696	7,956	42,792
Japan	Value	91,556	91,218	78,513
India	Value	33,355	31,094	25,497
Vietnam	Value	22,979	31,866	21,193
Malaysia	Value	28,701	26,524	20,251
Czech Republic	Value	29,933	29,569	23,795
United Kingdom	Value	13,722	14,378	12,779
China	Value	2,137	1,566	7,898
Indonesia	Value	7,859	7,009	5,977
All other destination markets	Value	42,659	34,169	32,525
All destination markets	Value	277,597	275,347	271,220

Table continued on next page.

[20] All tubes and pipes of refined copper are classified in HS subheading 7411.10, including products that fall outside of the scope of this investigation because they do not meet the product dimensions described in the scope and/or because the pipe and tube are welded (not seamless).

Table VII-13--Continued
SRC pipe and tube: Unit value and share of quantity from Thailand by destination market, 2018-20

Unit values in dollars per 1,000 pounds; Shares in percent

Destination market	Measure	2018	2019	2020
United States	Unit value	4,241	3,499	3,149
Japan	Unit value	4,736	4,716	4,777
India	Unit value	3,509	3,271	3,227
Vietnam	Unit value	3,502	3,278	3,243
Malaysia	Unit value	3,513	3,420	3,314
Czech Republic	Unit value	8,411	7,153	7,408
United Kingdom	Unit value	4,196	4,286	4,182
China	Unit value	3,733	3,604	3,579
Indonesia	Unit value	3,536	3,348	3,231
All other destination markets	Unit value	3,619	3,488	3,476
All destination markets	Unit value	4,201	4,025	3,860
United States	Share of quantity	1.7	3.3	19.3
Japan	Share of quantity	29.3	28.3	23.4
India	Share of quantity	14.4	13.9	11.2
Vietnam	Share of quantity	9.9	14.2	9.3
Malaysia	Share of quantity	12.4	11.3	8.7
Czech Republic	Share of quantity	5.4	6.0	4.6
United Kingdom	Share of quantity	4.9	4.9	4.3
China	Share of quantity	0.9	0.6	3.1
Indonesia	Share of quantity	3.4	3.1	2.6
All other destination markets	Share of quantity	17.8	14.3	13.3
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7411.10 as reported by Thai Customs Department in the Global Trade Atlas database, accessed July 2, 2021.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2020 data.

Global exports

Table VII-14 presents the largest global export sources of tubes and pipes of refined copper under HS subheading 7411.10 (including products outside of the scope of this investigation).[21] Data are presented by value only because quantity data for some countries were only available in units that could not be converted to a standard unit of measure. China and Vietnam were the largest exporters in 2020 and accounted for 22.9 percent and 14.0 percent of total global exports by value, respectively.

[21] All tubes and pipes of refined copper are classified in HS subheading 7411.10, including products that fall outside of the scope of this investigation because they do not meet the product dimensions described in the scope and/or because the pipe and tube are welded (not seamless).

Table VII-14
SRC pipe and tube: Global exports by exporter, 2018-20

Value in 1,000 dollars; Shares in percent

Exporting country	Measure	2018	2019	2020
United States	Value	140,764	116,441	115,838
Vietnam	Value	559,451	672,809	700,179
China	Value	1,196,840	1,221,925	1,140,336
Greece	Value	526,480	489,863	506,150
Germany	Value	568,637	457,202	435,137
Italy	Value	466,068	441,225	430,475
Thailand	Value	277,597	275,347	271,220
Korea	Value	303,457	268,041	258,866
Malaysia	Value	322,491	306,801	201,436
Canada	Value	117,867	122,783	135,181
Austria	Value	139,643	106,222	106,052
Finland	Value	109,285	91,062	84,264
All other exporters	Value	1,102,254	811,166	687,399
All reporting exporters	Value	5,721,548	5,289,826	4,988,268
United States	Share of value	2.5	2.2	2.3
Vietnam	Share of value	9.8	12.7	14.0
China	Share of value	20.9	23.1	22.9
Greece	Share of value	9.2	9.3	10.1
Germany	Share of value	9.9	8.6	8.7
Italy	Share of value	8.1	8.3	8.6
Thailand	Share of value	4.9	5.2	5.4
Korea	Share of value	5.3	5.1	5.2
Malaysia	Share of value	5.6	5.8	4.0
Canada	Share of value	2.1	2.3	2.7
Austria	Share of value	2.4	2.0	2.1
Finland	Share of value	1.9	1.7	1.7
All other exporters	Share of value	19.3	15.3	13.8
All reporting exporters	Share of value	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7411.10 reported by various national statistical authorities in the Global Trade Atlas database, accessed April 29, 2020.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top followed by the countries under investigation, all remaining top exporting countries in descending order of 2020 data.

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
85 FR 40680 July 7, 2020	*Seamless Refined Copper Pipe and Tube From Vietnam; Institution of an Anti-Dumping Duty Investigation and Scheduling of Preliminary Phase Investigation*	https://www.govinfo.gov/content/pkg/FR-2020-07-07/pdf/2020-14541.pdf
85 FR 47181 August 4, 2020	*Seamless Refined Copper Pipe and Tube From the Socialist Republic of Vietnam: Initiation of Less-Than-Fair-Value Investigation*	https://www.govinfo.gov/content/pkg/FR-2020-08-04/pdf/2020-17067.pdf
85 FR 51490 August 20, 2020	*Seamless Refined Copper Pipe and Tube From Vietnam*	https://www.govinfo.gov/content/pkg/FR-2020-08-20/pdf/2020-18201.pdf
85 FR 73459 November 18, 2020	*Seamless Refined Copper Pipe and Tube From the Socialist Republic of Vietnam: Postponement of Preliminary Determination in the Less-Than-Fair-Value Investigation*	https://www.govinfo.gov/content/pkg/FR-2020-08-20/pdf/2020-18201.pdf
86 FR 7698 February 1, 2021	*Seamless Refined Copper Pipe and Tube From the Socialist Republic of Vietnam: Preliminary Affirmative Determination of Sales at Less Than Fair Value and Preliminary Negative Determination of Critical Circumstances*	https://www.govinfo.gov/content/pkg/FR-2021-02-01/pdf/2021-02082.pdf

Citation	Title	Link
86 FR 8589 February 8, 2021	*Seamless Refined Copper Pipe and Tube From the Socialist Republic of Vietnam: Postponement of Final Determination of Less-Than-Fair-Value Investigation*	https://www.govinfo.gov/content/pkg/FR-2021-02-08/pdf/2021-02531.pdf
86 FR 10994 February 23, 2021	*Seamless Refined Copper Pipe and Tube From Vietnam; Scheduling of the Final Phase of an Anti-Dumping Duty Investigation*	https://www.govinfo.gov/content/pkg/FR-2021-02-23/pdf/2021-03678.pdf
86 FR 32277 June 17, 2021	*Seamless Refined Copper Pipe and Tube From Vietnam; Cancellation of Hearing for a Final Phase Anti-Dumping Duty Investigation*	https://www.govinfo.gov/content/pkg/FR-2021-06-17/pdf/2021-12731.pdf
86 FR 33228 June 24, 2021	*Seamless Refined Copper Pipe and Tube From the Socialist Republic of Vietnam: Final Affirmative Determination of Sales at Less Than Fair Value and Final Negative Determination of Critical Circumstances*	https://www.govinfo.gov/content/pkg/FR-2021-06-24/pdf/2021-13204.pdf

APPENDIX B

FEDERAL REGISTER NOTICE: CANCELED HEARING

TEXAS

Bexar County

Aurora Apartment Hotel, 509 Howard St., San Antonio, SG100006722

Additional documentation has been received for the following resources:

KENTUCKY

Jefferson County

St. James-Belgravia Historic District (Additional Documentation), Roughly bounded by Central Park, South 4th, South 6th, and Hill Sts., Louisville, AD72000538

Old Louisville Residential District (Additional Documentation), Irregular pattern roughly bounded by South 7th St., North-South Expwy., Kentucky St., and Avery St., Louisville, AD75000772

Nomination submitted by Federal Preservation Officer:

The State Historic Preservation Officer reviewed the following nomination and responded to the Federal Preservation Officer within 45 days of receipt of the nomination and supports listing the property in the National Register of Historic Places.

ARKANSAS

Newton County

Henderson, Frank and Eva Barnes ''Granny,'' Farm, Southwest of Hemmed In Hollow, approx. 1/10 mi. west of Buffalo R. just south of Sneeds Cr., Compton vicinity, SG100006726

Authority: Section 60.13 of 36 CFR part 60

Dated: June 8, 2021.

Sherry A. Frear,

Chief, National Register of Historic Places/National Historic Landmarks Program.

[FR Doc. 2021–12837 Filed 6–16–21; 8:45 am]

BILLING CODE 4312–52–P

INTERNATIONAL TRADE COMMISSION

[Investigation No. 731–TA–1528 (Final)]

Seamless Refined Copper Pipe and Tube From Vietnam; Cancellation of Hearing for a Final Phase Anti-Dumping Duty Investigation

AGENCY: United States International Trade Commission.

ACTION: Notice.

DATES: June 11, 2021.

FOR FURTHER INFORMATION CONTACT: Jordan Harriman ((202) 205–2610), Office of Investigations, U.S. International Trade Commission, 500 E Street SW, Washington, DC 20436. Hearing-impaired persons can obtain information on this matter by contacting the Commission's TDD terminal on 202–205–1810. Persons with mobility impairments who will need special assistance in gaining access to the Commission should contact the Office of the Secretary at 202–205–2000. General information concerning the Commission may also be obtained by accessing its internet server (*http://www.usitc.gov*). The public record for this investigation may be viewed on the Commission's electronic docket (EDIS) at *http://edis.usitc.gov.*

SUPPLEMENTARY INFORMATION: Effective February 1, 2021, the Commission published its schedule for the final phase of this investigation (86 FR 10994, February 23, 2021). On June 1, 2021, petitioners American Copper Tube Coalition and its constituent members, and interested party GD Copper USA Inc. (collectively, ''domestic producers''), requested that the Commission cancel the hearing for this investigation if no other party requested to appear at the hearing before the June 8, 2021 deadline for such request. On June 8, 2021, petitioners reiterated the proposal to cancel the hearing, and clarified on June 10, 2021 that they were withdrawing any request to participate in a hearing. Counsel indicated a willingness to submit written responses to any Commission questions in lieu of an actual hearing. Consequently, since no party to the investigation has requested a hearing, the public hearing in connection with this investigation, scheduled to begin at 9:30 a.m. on June 15, 2021, is canceled. Parties to this investigation should respond to any written questions posed by the Commission in their posthearing briefs, which are due to be filed on June 22, 2021.

For further information concerning this investigation see the Commission's notice cited above and the Commission's Rules of Practice and Procedure, part 201, subparts A through E (19 CFR part 201), and part 207, subparts A and C (19 CFR part 207).

Authority: This investigation is being conducted under authority of title VII of the Tariff Act of 1930; this notice is published pursuant to section 207.21 of the Commission's rules.

By order of the Commission.

Issued: June 11, 2021.

Katherine Hiner,

Acting Secretary to the Commission.

[FR Doc. 2021–12731 Filed 6–16–21; 8:45 am]

BILLING CODE 7020–02–P

INTERNATIONAL TRADE COMMISSION

[Investigation No. AA1921–167 (Fifth Review)]

Pressure Sensitive Plastic Tape From Italy; Termination of Five-Year Review

AGENCY: United States International Trade Commission.

ACTION: Notice.

SUMMARY: The Commission instituted the subject five-year review in March 1, 2021 to determine whether revocation of the antidumping duty order on pressure sensitive plastic tape from Italy would be likely to lead to continuation or recurrence of material injury. On June 7, 2021, the Department of Commerce published notice that it was revoking the order effective April 14, 2021, because no domestic interested party filed a timely notice of intent to participate. Accordingly, the subject review is terminated.

DATES: April 14, 2021 (effective date of revocation of the order).

FOR FURTHER INFORMATION CONTACT: Andres Andrade (202–205–2078), Office of Investigations, U.S. International Trade Commission, 500 E Street SW, Washington, DC 20436. Hearing-impaired individuals are advised that information on this matter can be obtained by contacting the Commission's TDD terminal on 202–205–1810. Persons with mobility impairments who will need special assistance in gaining access to the Commission should contact the Office of the Secretary at 202–205–2000. General information concerning the Commission may also be obtained by accessing its internet server (*https://www.usitc.gov*).

Authority: This review is being terminated under authority of title VII of the Tariff Act of 1930 and pursuant to section 751(c) of the Tariff Act of 1930 (19 U.S.C. 1675(c)). This notice is published pursuant to § 207.69 of the Commission's rules (19 CFR 207.69).

By order of the Commission.

Issued: June 11, 2021.

Katherine Hiner,

Acting Secretary to the Commission.

[FR Doc. 2021–12730 Filed 6–16–21; 8:45 am]

BILLING CODE 7020–02–P

INTERNATIONAL TRADE COMMISSION

Notice of Receipt of Complaint; Solicitation of Comments Relating to the Public Interest

AGENCY: U.S. International Trade Commission.

APPENDIX C

SUMMARY DATA

Table C-1
SRC pipe and tube: Summary data concerning the U.S. market, 2018-20
(Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per 1,000 pounds; Period changes=percent--exceptions noted)

	Reported data			Period changes		
	Calendar year			Comparison years		
	2018	2019	2020	2018-20	2018-19	2019-20
U.S. consumption quantity:						
Amount	675,059	659,633	647,430	▼(4.1)	▼(2.3)	▼(1.8)
Producers' share (fn1)	80.8	79.9	75.3	▼(5.5)	▼(0.9)	▼(4.6)
Importers' share (fn1):						
Vietnam	6.0	6.8	9.9	▲3.9	▲0.8	▲3.1
Nonsubject sources	13.2	13.4	14.8	▲1.6	▲0.1	▲1.4
All import sources	19.2	20.1	24.7	▲5.5	▲0.9	▲4.6
U.S. consumption value:						
Amount	2,526,323	2,340,164	2,297,980	▼(9.0)	▼(7.4)	▼(1.8)
Producers' share (fn1)	80.2	78.9	74.8	▼(5.4)	▼(1.2)	▼(4.1)
Importers' share (fn1):						
Vietnam	5.7	6.5	9.1	▲3.4	▲0.8	▲2.6
Nonsubject sources	14.2	14.6	16.1	▲1.9	▲0.4	▲1.5
All import sources	19.8	21.1	25.2	▲5.4	▲1.2	▲4.1
U.S. imports from:						
Vietnam:						
Quantity	40,377	44,629	64,133	▲58.8	▲10.5	▲43.7
Value	142,996	151,776	209,220	▲46.3	▲6.1	▲37.8
Unit value	$3,542	$3,401	$3,262	▼(7.9)	▼(4.0)	▼(4.1)
Ending inventory quantity	***	***	***	▲***	▲***	▲***
Nonsubject sources:						
Quantity	89,315	88,135	95,817	▲7.3	▼(1.3)	▲8.7
Value	358,201	341,357	369,661	▲3.2	▼(4.7)	▲8.3
Unit value	$4,011	$3,873	$3,858	▼(3.8)	▼(3.4)	▼(0.4)
Ending inventory quantity	***	***	***	▲***	▼***	▲***
All import sources:						
Quantity	129,692	132,764	159,950	▲23.3	▲2.4	▲20.5
Value	501,197	493,133	578,881	▲15.5	▼(1.6)	▲17.4
Unit value	$3,865	$3,714	$3,619	▼(6.3)	▼(3.9)	▼(2.6)
Ending inventory quantity	13,536	14,386	24,082	▲77.9	▲6.3	▲67.4
U.S. producers':						
Average capacity quantity	945,281	943,619	912,941	▼(3.4)	▼(0.2)	▼(3.3)
Production quantity	572,347	545,557	511,389	▼(10.7)	▼(4.7)	▼(6.3)
Capacity utilization (fn1)	60.5	57.8	56.0	▼(4.5)	▼(2.7)	▼(1.8)
U.S. shipments:						
Quantity	545,367	526,869	487,480	▼(10.6)	▼(3.4)	▼(7.5)
Value	2,025,126	1,847,031	1,719,099	▼(15.1)	▼(8.8)	▼(6.9)
Unit value	$3,713	$3,506	$3,527	▼(5.0)	▼(5.6)	▲0.6
Export shipments:						
Quantity	***	***	***	▼***	▼***	▼***
Value	***	***	***	▼***	▼***	▲***
Unit value	***	***	***	▼***	▼***	▲***

Table continued on next page

Table C-1--Continued
SRC pipe and tube: Summary data concerning the U.S. market, 2018-20
(Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per 1,000 pounds; Period changes=percent--exceptions noted)

	Reported data			Period changes		
	Calendar year			Comparison years		
	2018	2019	2020	2018-20	2018-19	2019-20
U.S. producers'--Continued:						
Ending inventory quantity	40,563	40,336	47,174	▲16.3	▼(0.6)	▲17.0
Inventories/total shipments (fn1)	***	***	***	▲***	▲***	▲***
Production workers	2,285	2,312	2,208	▼(3.4)	▲1.2	▼(4.5)
Hours worked (1,000s)	5,408	5,140	4,545	▼(16.0)	▼(5.0)	▼(11.6)
Wages paid ($1,000)	112,023	114,445	108,712	▼(3.0)	▲2.2	▼(5.0)
Hourly wages (dollars per hour)	$20.71	$22.27	$23.92	▲15.5	▲7.5	▲7.4
Productivity (pounds per hour)	105.8	106.1	112.5	▲6.3	▲0.3	▲6.0
Unit labor costs	$196	$210	$213	▲8.6	▲7.2	▲1.3
Net sales:						
Quantity	570,798	550,277	510,085	▼(10.6)	▼(3.6)	▼(7.3)
Value	2,124,865	1,932,826	1,807,283	▼(14.9)	▼(9.0)	▼(6.5)
Unit value	$3,723	$3,512	$3,543	▼(4.8)	▼(5.6)	▲0.9
Cost of goods sold (COGS)	1,956,276	1,797,304	1,673,924	▼(14.4)	▼(8.1)	▼(6.9)
Gross profit or (loss) (fn2)	168,589	135,522	133,359	▼(20.9)	▼(19.6)	▼(1.6)
SG&A expenses	124,786	125,863	113,103	▼(9.4)	▲0.9	▼(10.1)
Operating income or (loss) (fn2)	43,803	9,659	20,256	▼(53.8)	▼(77.9)	▲109.7
Net income or (loss) (fn2)	29,116	(6,741)	1,458	▼(95.0)	▼***	▲***
Unit COGS	$3,427	$3,266	$3,282	▼(4.2)	▼(4.7)	▲0.5
Unit SG&A expenses	$219	$229	$222	▲1.4	▲4.6	▼(3.1)
Unit operating income or (loss) (fn2)	$77	$18	$40	▼(48.3)	▼(77.1)	▲126.2
Unit net income or (loss) (fn2)	$51	($12)	$3	▼(94.4)	▼***	▲***
COGS/sales (fn1)	92.1	93.0	92.6	▲0.6	▲0.9	▼(0.4)
Operating income or (loss)/sales (fn1)	2.1	0.5	1.1	▼(0.9)	▼(1.6)	▲0.6
Net income or (loss)/sales (fn1)	1.4	(0.3)	0.1	▼(1.3)	▼(1.7)	▲0.4
Capital expenditures	18,443	29,707	20,523	▲11.3	▲61.1	▼(30.9)
Research and development expenses	***	***	***	▲***	***	▲***
Net assets	722,784	705,095	667,978	▼(7.6)	▼(2.4)	▼(5.3)

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "---". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.--Reported data are in percent and period changes are in percentage points.
fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting numbers 7411.10.1030 and 7411.10.1090, accessed June 21, 2021.

APPENDIX D

QUARTERLY DATA BY CHANNELS OF DISTRIBUTION

Tables D-1 through D-3 and figures D-1 through D-3 present quarterly data on U.S. producers' and U.S importers' shipments of SRC pipe and tube to distributors, to end users, and to both channels, respectively, as derived from questionnaire responses. U.S. producers' shipments to distributors accounted for at least *** percent of such shipments in each quarter. U.S. importers' shipments of SRC pipe and tube from Vietnam to distributors accounted for between *** percent of such shipments in any quarter, while U.S. importers' shipments of SRC pipe and tube from nonsubject sources to distributors accounted for between *** percent of such shipments.

U.S. producers' shipments to end users accounted for at least *** percent of such shipments in each quarter. U.S. importers' shipments of SRC pipe and tube from Vietnam to end users accounted for between *** percent of such shipments in any quarter, while U.S. importers' shipments of SRC pipe and tube from nonsubject sources to end users accounted for between *** percent of such shipments.

Table D-1
SRC pipe and tube: U.S. producers' and U.S. importers' shipments to distributors, by quarter and by source

Quantity in 1,000 pounds; Value in 1,000 dollars

Quarter	Measure	United States	Vietnam	All other import sources	All import sources	All sources
2018 Q1	Quantity	***	***	***	***	***
2018 Q2	Quantity	***	***	***	***	***
2018 Q3	Quantity	***	***	***	***	***
2018 Q4	Quantity	***	***	***	***	***
2019 Q1	Quantity	***	***	***	***	***
2019 Q2	Quantity	***	***	***	***	***
2019 Q3	Quantity	***	***	***	***	***
2019 Q4	Quantity	***	***	***	***	***
2020 Q1	Quantity	***	***	***	***	***
2020 Q2	Quantity	***	***	***	***	***
2020 Q3	Quantity	***	***	***	***	***
2020 Q4	Quantity	***	***	***	***	***
2018 Q1	Value	***	***	***	***	***
2018 Q2	Value	***	***	***	***	***
2018 Q3	Value	***	***	***	***	***
2018 Q4	Value	***	***	***	***	***
2019 Q1	Value	***	***	***	***	***
2019 Q2	Value	***	***	***	***	***
2019 Q3	Value	***	***	***	***	***
2019 Q4	Value	***	***	***	***	***
2020 Q1	Value	***	***	***	***	***
2020 Q2	Value	***	***	***	***	***
2020 Q3	Value	***	***	***	***	***
2020 Q4	Value	***	***	***	***	***

Table continued on next page.

Table D-1--Continued
SRC pipe and tube: U.S. producers' and U.S. importers' shipments to distributors, by quarter and by source

Unit values in dollars per 1,000 pounds; Shares in percent and represent share of quantity across

Quarter	Measure	United States	Vietnam	All other import sources	All import sources	All sources
2018 Q1	Unit Value	***	***	***	***	***
2018 Q2	Unit Value	***	***	***	***	***
2018 Q3	Unit Value	***	***	***	***	***
2018 Q4	Unit Value	***	***	***	***	***
2019 Q1	Unit Value	***	***	***	***	***
2019 Q2	Unit Value	***	***	***	***	***
2019 Q3	Unit Value	***	***	***	***	***
2019 Q4	Unit Value	***	***	***	***	***
2020 Q1	Unit Value	***	***	***	***	***
2020 Q2	Unit Value	***	***	***	***	***
2020 Q3	Unit Value	***	***	***	***	***
2020 Q4	Unit Value	***	***	***	***	***
2018 Q1	Share	***	***	***	***	***
2018 Q2	Share	***	***	***	***	***
2018 Q3	Share	***	***	***	***	***
2018 Q4	Share	***	***	***	***	***
2019 Q1	Share	***	***	***	***	***
2019 Q2	Share	***	***	***	***	***
2019 Q3	Share	***	***	***	***	***
2019 Q4	Share	***	***	***	***	***
2020 Q1	Share	***	***	***	***	***
2020 Q2	Share	***	***	***	***	***
2020 Q3	Share	***	***	***	***	***
2020 Q4	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Figure D-1
SRC pipe and tube: U.S. producers' and U.S. importers' share of shipments to distributors, by quarter and by source

* * * * * * *

Table D-2
SRC pipe and tube: U.S. producers' and U.S. importers' shipments to end users, by quarter and by source

Quantity in 1,000 pounds; Value in 1,000 dollars

Quarter	Measure	United States	Vietnam	All other import sources	All import sources	All sources
2018 Q1	Quantity	***	***	***	***	***
2018 Q2	Quantity	***	***	***	***	***
2018 Q3	Quantity	***	***	***	***	***
2018 Q4	Quantity	***	***	***	***	***
2019 Q1	Quantity	***	***	***	***	***
2019 Q2	Quantity	***	***	***	***	***
2019 Q3	Quantity	***	***	***	***	***
2019 Q4	Quantity	***	***	***	***	***
2020 Q1	Quantity	***	***	***	***	***
2020 Q2	Quantity	***	***	***	***	***
2020 Q3	Quantity	***	***	***	***	***
2020 Q4	Quantity	***	***	***	***	***
2018 Q1	Value	***	***	***	***	***
2018 Q2	Value	***	***	***	***	***
2018 Q3	Value	***	***	***	***	***
2018 Q4	Value	***	***	***	***	***
2019 Q1	Value	***	***	***	***	***
2019 Q2	Value	***	***	***	***	***
2019 Q3	Value	***	***	***	***	***
2019 Q4	Value	***	***	***	***	***
2020 Q1	Value	***	***	***	***	***
2020 Q2	Value	***	***	***	***	***
2020 Q3	Value	***	***	***	***	***
2020 Q4	Value	***	***	***	***	***

Table continued on next page.

Table D-2--Continued
SRC pipe and tube: U.S. producers' and U.S. importers' shipments to end users, by quarter and by source

Unit values in dollars per 1,000 pounds; Shares in percent and represent share of quantity across

Quarter	Measure	United States	Vietnam	All other import sources	All import sources	All sources
2018 Q1	Unit Value	***	***	***	***	***
2018 Q2	Unit Value	***	***	***	***	***
2018 Q3	Unit Value	***	***	***	***	***
2018 Q4	Unit Value	***	***	***	***	***
2019 Q1	Unit Value	***	***	***	***	***
2019 Q2	Unit Value	***	***	***	***	***
2019 Q3	Unit Value	***	***	***	***	***
2019 Q4	Unit Value	***	***	***	***	***
2020 Q1	Unit Value	***	***	***	***	***
2020 Q2	Unit Value	***	***	***	***	***
2020 Q3	Unit Value	***	***	***	***	***
2020 Q4	Unit Value	***	***	***	***	***
2018 Q1	Share	***	***	***	***	***
2018 Q2	Share	***	***	***	***	***
2018 Q3	Share	***	***	***	***	***
2018 Q4	Share	***	***	***	***	***
2019 Q1	Share	***	***	***	***	***
2019 Q2	Share	***	***	***	***	***
2019 Q3	Share	***	***	***	***	***
2019 Q4	Share	***	***	***	***	***
2020 Q1	Share	***	***	***	***	***
2020 Q2	Share	***	***	***	***	***
2020 Q3	Share	***	***	***	***	***
2020 Q4	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Figure D-2
SRC pipe and tube: U.S. producers' and U.S. importers' share of shipments to end users, by quarter and by source

* * * * * * *

Table D-3
SRC pipe and tube: U.S. producers' and U.S. importers' shipments to distributors and end users, by quarter and by source

Quantity in 1,000 pounds; Value in 1,000 dollars

Quarter	Measure	United States	Vietnam	All other import sources	All import sources	All sources
2018 Q1	Quantity	***	***	***	***	***
2018 Q2	Quantity	***	***	***	***	***
2018 Q3	Quantity	***	***	***	***	***
2018 Q4	Quantity	***	***	***	***	***
2019 Q1	Quantity	***	***	***	***	***
2019 Q2	Quantity	***	***	***	***	***
2019 Q3	Quantity	***	***	***	***	***
2019 Q4	Quantity	***	***	***	***	***
2020 Q1	Quantity	***	***	***	***	***
2020 Q2	Quantity	***	***	***	***	***
2020 Q3	Quantity	***	***	***	***	***
2020 Q4	Quantity	***	***	***	***	***
2018 Q1	Value	***	***	***	***	***
2018 Q2	Value	***	***	***	***	***
2018 Q3	Value	***	***	***	***	***
2018 Q4	Value	***	***	***	***	***
2019 Q1	Value	***	***	***	***	***
2019 Q2	Value	***	***	***	***	***
2019 Q3	Value	***	***	***	***	***
2019 Q4	Value	***	***	***	***	***
2020 Q1	Value	***	***	***	***	***
2020 Q2	Value	***	***	***	***	***
2020 Q3	Value	***	***	***	***	***
2020 Q4	Value	***	***	***	***	***

Table continued on next page.

Table D-3--Continued
SRC pipe and tube: U.S. producers' and U.S. importers' shipments to distributors and end users, by quarter and by source

Unit values in dollars per 1,000 pounds; Shares in percent and represent share of quantity across

Quarter	Measure	United States	Vietnam	All other import sources	All import sources	All sources
2018 Q1	Unit Value	***	***	***	***	***
2018 Q2	Unit Value	***	***	***	***	***
2018 Q3	Unit Value	***	***	***	***	***
2018 Q4	Unit Value	***	***	***	***	***
2019 Q1	Unit Value	***	***	***	***	***
2019 Q2	Unit Value	***	***	***	***	***
2019 Q3	Unit Value	***	***	***	***	***
2019 Q4	Unit Value	***	***	***	***	***
2020 Q1	Unit Value	***	***	***	***	***
2020 Q2	Unit Value	***	***	***	***	***
2020 Q3	Unit Value	***	***	***	***	***
2020 Q4	Unit Value	***	***	***	***	***
2018 Q1	Share	***	***	***	***	***
2018 Q2	Share	***	***	***	***	***
2018 Q3	Share	***	***	***	***	***
2018 Q4	Share	***	***	***	***	***
2019 Q1	Share	***	***	***	***	***
2019 Q2	Share	***	***	***	***	***
2019 Q3	Share	***	***	***	***	***
2019 Q4	Share	***	***	***	***	***
2020 Q1	Share	***	***	***	***	***
2020 Q2	Share	***	***	***	***	***
2020 Q3	Share	***	***	***	***	***
2020 Q4	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Figure D-3
SRC pipe and tube: U.S. producers' and U.S. importers' share of shipments to distributors and end users, by quarter and by source

* * * * * * *