

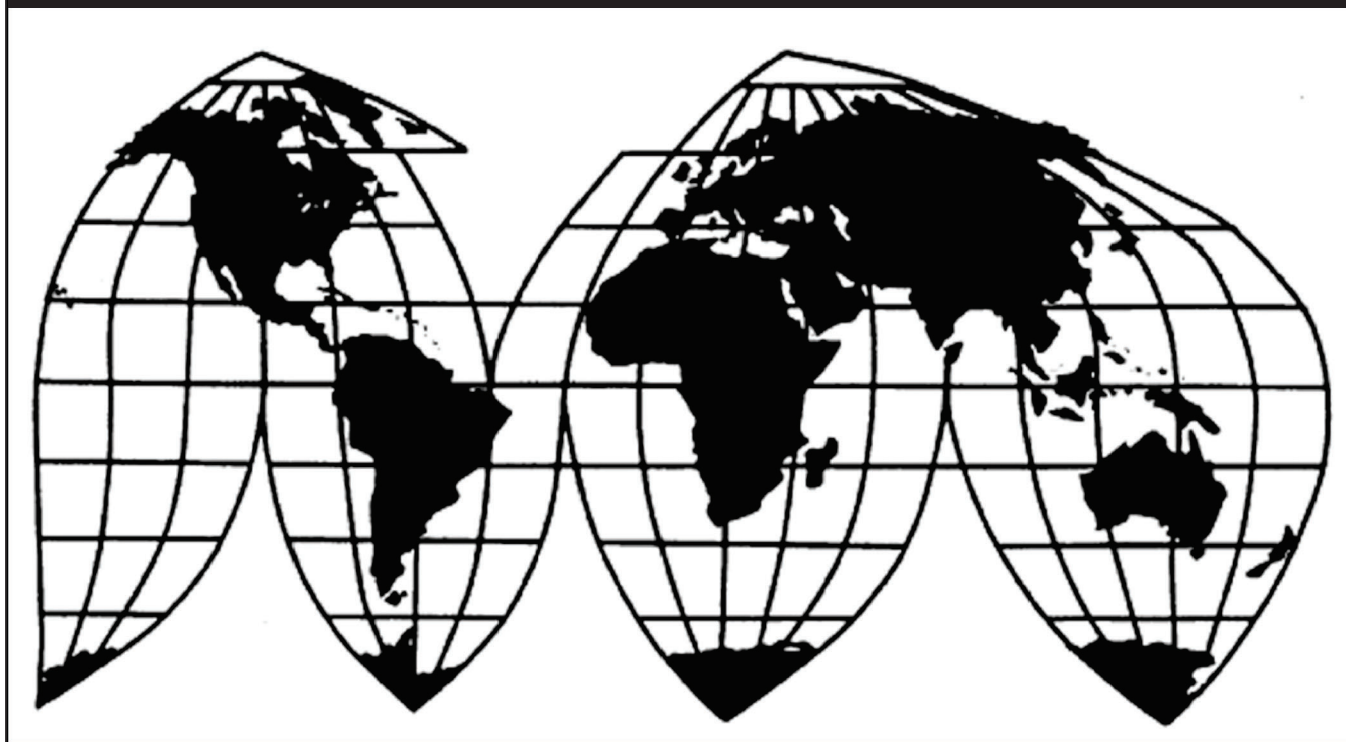
# **Paper File Folders from China, India, and Vietnam**

Investigation Nos. 701-TA-683 and 731-TA-1594-1596 (Final)

**Publication 5472**

**November 2023**

**U.S. International Trade Commission**



Washington, DC 20436

# U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual concerns may not be published.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 Nos. 701-TA-683 and 731-TA-1594-1596 (Final)

Paper File Folders from China, India, and Vietnam

### DETERMINATIONS

On the basis of the record<sup>1</sup> developed in the subject investigations, 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 paper file folders from China, India, and Vietnam, provided for in subheading 4820.30.00 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”), and to be subsidized by the government of India.<sup>2</sup>

### BACKGROUND

The Commission instituted these investigations, effective October 12, 2022, following receipt of petitions filed with the Commission and Commerce by the Coalition of Domestic Folder Manufacturers, Hastings, Minnesota and Naperville, Illinois. The final phase of the investigations was scheduled by the Commission following notification of preliminary determinations by Commerce that imports of paper file folders from India were subsidized within the meaning of section 703(b) of the Act (19 U.S.C. 1671b(b)) and imports of paper file folders from China, India, and Vietnam were sold at LTFV within the meaning of 733(b) of the Act (19 U.S.C. 1673b(b)). Notice of the scheduling of the final phase of the Commission’s investigations and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* on June 8, 2023 (88 FR

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<sup>1</sup> The record is defined in § 207.2(f) of the Commission’s Rules of Practice and Procedure (19 CFR 207.2(f)).

<sup>2</sup> 88 FR 69130, 88 FR 69134, 88 FR 69138, and 88 FR 69141, October 5, 2023.

37579). The public hearing in connection with the investigations, originally scheduled for October 3, 2023, was cancelled.<sup>3</sup>

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<sup>3</sup> 88 FR 68670, October 4, 2023.

## Views of the Commission

Based on the record in the final phase of these investigations, we determine that an industry in the United States is materially injured by reason of imports of paper file folders (“PFFs”) from China, India, and Vietnam found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”) and to be subsidized by the government of India.

### I. Background

The Coalition of Domestic Folder Manufacturers (“Petitioner”) filed the petitions in these investigations on October 12, 2022. Petitioner consists of Smead Manufacturing Company, Inc. (“Smead”) and TOPS Products LLC (“TOPS”), domestic producers of PFFs.<sup>1</sup> Petitioner submitted a prehearing brief, witness testimony, responses to Commission questions, and a posthearing brief.<sup>2</sup> No respondent participated in the final phase of these investigations.

The period of investigation in the final phase of these investigations is January 2020 through June 2023 (“POI”). U.S. industry data are based on the questionnaire responses from three firms that accounted for the vast majority of domestic production of PFFs during 2022.<sup>3</sup>

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<sup>1</sup> Petitions at 2-3.

<sup>2</sup> No public hearing was conducted in the final phase of these investigations. The Commission initially scheduled a hearing for Tuesday, October 3, 2023. *Paper File Folders From China, India, and Vietnam; Scheduling of the Final Phase of Countervailing Duty and Anti-Dumping Duty Investigations*, 88 Fed. Reg. 37,579, 37580 (May 17, 2023). While Petitioner filed a request to appear at the hearing, it later withdrew its appearance and requested that the Commission cancel the hearing when no other requests to appear were filed. Subsequently, the Commission granted this request and cancelled the hearing. *Paper File Folders From China, India, and Vietnam; Cancellation of Hearing for Antidumping and Countervailing Duty Investigations*, 88 Fed. Reg. 68,670 (Sep. 28, 2023).

<sup>3</sup> Confidential Report, Memorandum INV-VV-088 (Oct. 20, 2023), as amended by Memorandum INV-VV-089 (Oct. 23, 2023) (“CR”) and *Paper File Folders from China, India, and Vietnam*, Inv. Nos. 701-TA-683 and 731-TA-1594-1596 (Final), USITC Publication 5472 (Nov. 2023) (“PR”) at I-5 and III-1.

U.S. import data are based on official Commerce import statistics and from questionnaire responses of 12 U.S. importers of PFFs, accounting for over \*\*\* percent of imports from China and over \*\*\* percent of imports from India, Vietnam, and nonsubject sources classified under HTS statistical reporting number 4820.30.0040, a “basket” category that includes PFFs and out-of-scope merchandise, in 2022.<sup>4</sup> Data concerning the subject industry in India are based on the questionnaire response of one Indian producer of subject merchandise that accounted for approximately \*\*\* percent of production of subject merchandise in India during 2022.<sup>5</sup> Data concerning the subject industry in Vietnam are based on the questionnaire response of one Vietnamese producer of subject merchandise that accounted for an estimated \*\*\* percent of production of subject merchandise in Vietnam during 2022.<sup>6</sup> In the absence of questionnaire responses from Chinese producers, data and related information concerning the paper file folders industry in China are based on the questionnaire response of one Chinese producer of subject merchandise filed in the preliminary phase of these investigations, industry research, and public export data.<sup>7</sup>

## **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.”<sup>8</sup> Section 771(4)(A) of the Tariff Act

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<sup>4</sup> CR/PR at I-5 and IV-1.

<sup>5</sup> CR/PR at VII-6

<sup>6</sup> CR/PR at VII-14.

<sup>7</sup> CR/PR at VII-3-VII-5, VII-27-VII-29.

<sup>8</sup> 19 U.S.C. § 1677(4)(A).

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.”<sup>9</sup> 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.”<sup>10</sup>

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.<sup>11</sup> 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.”<sup>12</sup> The Commission then defines the domestic like product in light of the imported articles Commerce has identified.<sup>13</sup> The decision regarding the appropriate domestic like product(s) in an investigation is a factual determination, and the

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<sup>9</sup> 19 U.S.C. § 1677(4)(A).

<sup>10</sup> 19 U.S.C. § 1677(10).

<sup>11</sup> 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).

<sup>12</sup> *Cleo Inc. v. United States*, 501 F.3d 1291, 1298 (Fed. Cir. 2007); *see also* *Hitachi Metals, Ltd. v. United States*, Case No. 19-1289, slip op. at 8-9 (Fed. Circ. Feb. 7, 2020) (the statute requires the Commission to start with Commerce’s subject merchandise in reaching its own like product determination).

<sup>13</sup> *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).

Commission has applied the statutory standard of “like” or “most similar in characteristics and uses” on a case-by-case basis.<sup>14</sup> No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.<sup>15</sup> The Commission looks for clear dividing lines among possible like products and disregards minor variations.<sup>16</sup>

## **B. Product Description**

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

The products within the scope of the investigation are file folders consisting primarily of paper, paperboard, pressboard, or other cellulose material, whether coated or uncoated, that has been folded (or creased in preparation to be folded), glued, taped, bound, or otherwise assembled to be suitable for holding documents. The scope includes all such folders, regardless of color, whether or not expanding, whether or not laminated, and with or without tabs, fasteners, closures, hooks, rods, hangers, pockets, gussets, or internal dividers. The term “primarily” as used in the first sentence of this scope means 50 percent or more of the total product weight, exclusive of the weight of fasteners, closures, hooks,

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<sup>14</sup> See, e.g., *Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department 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 Co. v. United States*, 747 F. Supp. 744, 749 n.3 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (“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).

<sup>15</sup> See, e.g., S. Rep. No. 96-249 at 90-91 (1979).

<sup>16</sup> *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.”).



rods, hangers, removable tabs, and similar accessories, and exclusive of the weight of packaging.

Subject folders have the following dimensions in their folded and closed position: lengths and widths of at least 8 inches and no greater than 17 inches, regardless of depth.

The scope covers all varieties of folders, including but not limited to manila folders, hanging folders, fastener folders, classification folders, expanding folders, pockets, jackets, and wallets.

Excluded from the scope are:

- mailing envelopes with a flap bearing one or more adhesive strips that can be used permanently to seal the entire length of a side such that, when sealed, the folder is closed on all four sides;
- binders, with two or more rings to hold documents in place, made from paperboard or pressboard encased entirely in plastic;
- binders consisting of a front cover, back cover, and spine, with or without a flap; to be excluded, a mechanism with two or more metal rings must be included on or adjacent to the interior spine;
- non-expanding folders with a depth exceeding 2.5 inches and that are closed or closeable on the top, bottom, and all four sides (e.g., boxes or cartons);
- expanding folders that have (1) 13 or more pockets, (2) a flap covering the top, (3) a latching mechanism made of plastic and/or metal to close the flap, and (4) an affixed plastic or metal carry handle;
- folders that have an outer surface (other than the gusset, handles, and/or closing mechanisms, if any) that is covered entirely with fabric, leather, and/or faux leather;
- fashion folders, which are defined as folders with all of the following characteristics: (1) plastic lamination covering the entire exterior of the folder, (2) printing, foil stamping, embossing ( *i.e.*, raised relief patterns that are recessed on the opposite side), and/or debossing ( *i.e.*, recessed relief patterns that are raised on the opposite side), covering the entire exterior surface area of the folder, (3) at least two visible and printed or foil stamped colors (other than the color of the base paper), each of which separately covers no less than 10 percent of the entire exterior

surface area, and (4) patterns, pictures, designs, or artwork covering no less than thirty percent of the exterior surface area of the folder;

- portfolios, which are folders having (1) a width of at least 16 inches when open flat, (2) no tabs or dividers, and (3) one or more pockets that are suitable for holding letter size documents and that cover at least 15 percent of the surface area of the relevant interior side or sides; and
- report covers, which are folders having (1) no tabs, dividers, or pockets, and (2) one or more fasteners or clips, each of which is permanently affixed to the center fold, to hold papers securely in place.
- Imports of the subject merchandise are provided for under Harmonized Tariff Schedule of the United States (HTSUS) category 4820.30.0040. Subject imports may also enter under other HTSUS classifications. While the HTSUS subheading is provided for convenience and customs purposes, the written description of the scope of the investigation is dispositive.<sup>17</sup>

File folders are folded products used mainly to hold documents or other records together for professional office or home office organization. PFFs are primarily made of paper, paperboard, pressboard, or other cellulose material.<sup>18</sup>

PFFs can be glued, taped, bound, or otherwise assembled. They can also be coated or uncoated; laminated or not; and expanding or not. They may incorporate fasteners, closures, hooks, rods, hangers, pockets, gussets, or internal dividers. All PFFs are folded to be opened on a least one side to allow for the insertion and removal of documents and other materials. They generally feature plain designs and colors.<sup>19</sup>

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<sup>17</sup> *Paper File Folders From the People's Republic of China: Final Affirmative Determination of Sales at Less-Than-Fair Value*, 88 Fed. Reg. 69,141, 69,142 (Oct. 5, 2023); *Paper File Folders From India: Final Affirmative Determination of Sales at Less Than Fair Value*, 88 Fed. Reg. 69,138, 69,140-69,141 (Oct. 5, 2023); *Paper File Folders From the Socialist Republic of Vietnam: Final Affirmative Determination of Sales at Less-Than-Fair-Value Investigation*, 88 Fed. Reg. 69,130, 69,131-69,132 (Oct. 5, 2023); *Paper File Folders From India: Final Affirmative Countervailing Duty Determination*, 88 Fed. Reg. 69,134, 69,136 (Oct. 5, 2023).

<sup>18</sup> CR/PR at I-10.

<sup>19</sup> CR/PR at I-10.

PFFs are usually designed to hold letter and legal-size documents. As such, PFFs, in their folded and closed position, have lengths and widths of at least 8 inches and no greater than 17 inches, regardless of depth. The type of PFF being used varies based on the filing system utilized in a specific office setting. Many users organize their filing systems based on the thickness of the document being filed. There are many types of PFFs, including but not limited to manila folders, hanging folders, fastener folders, classification folders, expanding folders, pockets, jackets, and wallets.<sup>20</sup>

**C. Petitioner's Arguments**

Petitioner argues that the Commission should define a single domestic like product, consisting of PFFs, that is coextensive with the scope.<sup>21</sup>

**D. Domestic Like Product Analysis**

In the preliminary determinations, the Commission defined a single domestic product consisting of all PFFs within the scope. It found that all domestically produced PFFs within the scope shared the same basic characteristics and general use, are generally produced using the same production processes and employees in the same manufacturing facilities, are generally interchangeable, are sold through the same channels of distribution, and are perceived to be a single product category by market participants. While recognizing that there were some differences among domestically produced PFFs in terms of form, finishes, features, and price,

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<sup>20</sup> CR/PR at I-11.

<sup>21</sup> Petitioner's Prehearing Br. at 6-11.

the Commission viewed these differences as consistent with a continuum of paper file folder products within a single domestic like product.<sup>22</sup>

The record of these final phase investigations does not contain any new information concerning the characteristics and uses of PFFs suggesting that the Commission should revisit its definition of the domestic like product from the preliminary phase of the investigations.<sup>23</sup> Accordingly, we again define a single domestic like product consisting of all PFFs, coextensive with the scope of investigations.

### **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.”<sup>24</sup> 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.

#### **A. Related Parties**

We must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise

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<sup>22</sup> *Paper File Folders from China, India, and Vietnam*, Inv. Nos. 701-TA-683 and 731-TA-1594-1596 (Preliminary), USITC Pub. 5389 (Dec. 2022) (“*Preliminary Determinations*”) at 13-17.

<sup>23</sup> See generally CR/PR at I-10-I-20.

<sup>24</sup> 19 U.S.C. § 1677(4)(A).

or which are themselves importers.<sup>25</sup> Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.<sup>26</sup>

Domestic producers \*\*\* and \*\*\* qualify for possible exclusion under the related parties provision<sup>27</sup> because they imported subject merchandise during the period of investigation.<sup>28</sup> \*\*\* also qualifies as a related party through its \*\*\* percent ownership stake in \*\*\*, a U.S. importer of subject merchandise.<sup>29</sup> We discuss below whether appropriate circumstances exist to exclude either producer from the domestic industry.

## **B. Petitioner's Arguments**

Petitioner argues that the Commission should define the domestic industry to include all domestic producers of PFFs.<sup>30</sup> It contends that, while \*\*\* and \*\*\* are subject to

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<sup>25</sup> See *Torrington Co. v. United States*, 790 F. Supp. 1161, 1168 (Ct. Int'l Trade 1992), *aff'd without opinion*, 991 F.2d 809 (Fed. Cir. 1993); *Sandvik AB v. United States*, 721 F. Supp. 1322, 1331-32 (Ct. Int'l Trade 1989), *aff'd mem.*, 904 F.2d 46 (Fed. Cir. 1990); *Empire Plow Co. v. United States*, 675 F. Supp. 1348, 1352 (Ct. Int'l Trade 1987).

<sup>26</sup> The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

- (1) the percentage of domestic production attributable to the importing producer;
- (2) the reason the U.S. producer has decided to import the product subject to investigation (whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market);
- (3) whether inclusion or exclusion of the related party will skew the data for the rest of the industry;
- (4) the ratio of import shipments to U.S. production for the imported product; and
- (5) whether the primary interest of the importing producer lies in domestic production or importation. *Changzhou Trina Solar Energy Co. v. USITC*, 100 F. Supp.3d 1314, 1326-31 (Ct. Int'l. Trade 2015); see also *Torrington Co. v. United States*, 790 F. Supp. at 1168.

<sup>27</sup> CR/PR at III-1, Tables III-2, III-11-III-13. See 19 U.S.C. § 1677(4)(B)(i).

<sup>28</sup> CR/PR at Tables III-11-III-12.

<sup>29</sup> CR/PR at Table III-2.

<sup>30</sup> Petitioner's Prehearing Br. at 11.

possible exclusion as related parties, the Commission should find that appropriate circumstances do not exist to exclude them from the domestic industry.<sup>31</sup>

### C. Analysis

In its preliminary determinations, the Commission found that appropriate circumstances did not exist to exclude either \*\*\* or \*\*\* from the domestic industry under the related parties provision because their imports of subject merchandise were small in relation to their domestic production.<sup>32</sup> In the final phase of these investigations, we continue to find that appropriate circumstances do not exist to exclude either \*\*\* or \*\*\* from the domestic industry, based upon the following analysis.

\*\*\*. The record indicates that \*\*\*, was the second largest reporting domestic producer, accounting for \*\*\* percent of U.S. production of PFFs in 2022.<sup>33</sup> \*\*\* imports of subject merchandise were \*\*\* folders in 2020, \*\*\* folders in 2021, and \*\*\* folders in 2022; they were \*\*\* folders in January through June (“interim”) 2023 compared to \*\*\* folders in interim 2022.<sup>34</sup> The ratio of \*\*\* imports of subject merchandise to \*\*\* domestic production was \*\*\* percent in 2020, \*\*\* percent in 2021, and \*\*\* percent in 2022; it was \*\*\* percent in interim 2023 compared to \*\*\* percent in interim 2022.<sup>35</sup> \*\*\* indicated that it imported subject merchandise to \*\*\*.<sup>36</sup>

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<sup>31</sup> Petitioner’s Prehearing Br. at 12.

<sup>32</sup> See *Confidential Preliminary Views*, EDIS Doc. No. 785804 (Dec. 6, 2022) at 19-20.

<sup>33</sup> CR/PR at Table III-1.

<sup>34</sup> CR/PR at Table III-11.

<sup>35</sup> CR/PR at Table III-11.

<sup>36</sup> CR/PR at Table III-13.

In view of the fact that imports of subject merchandise by \*\*\* were very small in relation to \*\*\* domestic production and it accounted for \*\*\* percent of domestic production of PFFs in 2022, the record indicates \*\*\* primary interest is in domestic production. Additionally, the record provides no indication that its inclusion would skew data for the domestic industry. We therefore find that appropriate circumstances do not exist to exclude \*\*\* from the domestic industry under the related parties provision.

\*\*\*. The record indicates that \*\*\*, was responsible for \*\*\* percent of U.S. production of PFFs in 2022, and was the \*\*\* of the two responding U.S. producers that year in terms of quantity of U.S. production.<sup>37</sup> \*\*\* imported \*\*\* subject folders in 2020, \*\*\* subject folders in 2021, and \*\*\* folders in 2022; it imported \*\*\* folders in interim 2023 compared to \*\*\* folders in interim 2022.<sup>38</sup> The ratio of its imports of subject merchandise to its domestic production was \*\*\* percent in 2020, and \*\*\* percent in 2021 and 2022; it was \*\*\* percent in interim 2023 compared to \*\*\* percent in interim 2022.<sup>39</sup> \*\*\* indicated that it imported subject merchandise to \*\*\*.<sup>40</sup>

The fact that \*\*\* imports of subject merchandise were small in relation to its domestic production and that it accounted for \*\*\* percent of domestic production of PFFs in 2022 indicates that \*\*\* primary interest lies in domestic production. Additionally, the record provides no indication that its inclusion would skew data for the domestic industry. We

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<sup>37</sup> CR/PR at Table III-1.

<sup>38</sup> CR/PR at Table III-12.

<sup>39</sup> CR/PR at Table III-12.

<sup>40</sup> CR/PR at Table III-13.

therefore find that appropriate circumstances do not exist to exclude \*\*\* from the domestic industry under the related parties provision.

In sum, consistent with our definition of the domestic like product, we define the domestic industry as consisting of all U.S. producers of PFFs.

#### **IV. Negligibility**

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.<sup>41</sup> The statute further provides that subject imports from a single country which comprise less than 3 percent of total such imports of the product may not be considered negligible if there are several countries subject to investigation with negligible imports and the sum of such imports from all those countries collectively accounts for more than 7 percent of the volume of all such merchandise imported into the United States.<sup>42</sup>

##### **A. Petitioner's Arguments**

Petitioner argues that the Commission should rely on adjusted official U.S. import statistics instead of questionnaire data to find that imports from each of the subject countries are above the negligibility thresholds.<sup>43</sup>

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<sup>41</sup> 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)).

<sup>42</sup> 19 U.S.C. § 1677(24)(A)(ii).

<sup>43</sup> Petitioner's Prehearing Br. at 12-13.



## B. Analysis

In its preliminary determinations, the Commission found that neither official U.S. import statistics nor importer questionnaire data alone provided a reliable measure of imports of PFF for negligibility purposes because official U.S. import statistics contain substantial quantities of out-of-scope merchandise, and were thus overstated, whereas questionnaire data did not include responses from certain large importers, and were thus understated.<sup>44</sup> To calculate a more reliable estimate of PFF import volumes, the Commission adjusted official U.S. import statistics by removing volumes of out-of-scope merchandise as reported in the questionnaire data as a share of total primary HTS questionnaire data, and by adding additional volumes of PFFs that were imported under other HTS numbers based on questionnaire data. Based on these adjusted data, the Commission found that imports from each subject country were above the statutory threshold.<sup>45</sup>

In the absence of any new information or argument to the contrary in the final phase of the investigations, we again rely on adjusted official U.S. import statistics to assess negligibility. These data indicate that during the 12-month period preceding the filing of the petitions, October 2021 through September 2022, subject imports from China accounted for \*\*\* percent of total imports of PFFs, subject imports from India accounted for \*\*\* percent of total imports of PFFs, and subject imports from Vietnam accounted for \*\*\* percent of total imports of PFFs.<sup>46</sup>

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<sup>44</sup> Preliminary Determinations at 22.

<sup>45</sup> Preliminary Determinations at 22-23.

<sup>46</sup> CR/PR at Table IV-5. According to official U.S. import statistics, imports from China accounted for 15.4 percent of total imports, imports from India accounted for 12.7 percent of total imports, and imports from Vietnam accounted for 36.1 percent of total imports from October 2021 through September 2022. *Id.* at Table D-3. According to questionnaire data, subject imports from China accounted for \*\*\* percent of total imports, imports from India accounted for \*\*\* percent of total imports, and imports from Vietnam accounted for \*\*\* percent of total imports. *Id.* at Table IV-5.

Because imports for each country subject to these investigations are above the statutory threshold of 3 percent, we find that imports from China and Vietnam subject to the antidumping duty investigations, and imports from India subject to the antidumping and countervailing duty investigations, are not negligible.

## V. Cumulation

For purposes of evaluating the volume and effects for a determination of material injury by reason of subject imports, section 771(7)(G)(i) of the Tariff Act requires the Commission to cumulate subject imports from all countries as to which petitions were filed and/or investigations self-initiated by Commerce on the same day, if such imports compete with each other and with the domestic like product in the U.S. market. In assessing whether subject imports compete with each other and with the domestic like product, the Commission generally has considered four factors:

- (1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality related questions;
- (2) the presence of sales or offers to sell in the same geographic markets of subject imports from different countries and the domestic like product;
- (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and
- (4) whether the subject imports are simultaneously present in the market.<sup>47</sup>

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<sup>47</sup> See *Certain Cast-Iron Pipe Fittings from Brazil, the Republic of Korea, and Taiwan*, Inv. Nos. 731-TA-278-280 (Final), USITC Pub. 1845 (May 1986), *aff'd*, *Fundicao Tupy, S.A. v. United States*, 678 F. Supp. 898 (Ct. Int'l Trade), *aff'd*, 859 F.2d 915 (Fed. Cir. 1988).

While no single factor is necessarily determinative, and the list of factors is not exclusive, these factors are intended to provide the Commission with a framework for determining whether the subject imports compete with each other and with the domestic like product.<sup>48</sup> Only a “reasonable overlap” of competition is required.<sup>49</sup>

#### **A. Petitioner’s Arguments**

Petitioner argues that imports from each subject source should be cumulated.<sup>50</sup> It contends that the petitions were filed on the same day and there is a reasonable overlap of competition between and among subject imports from each source and the domestic like product. Specifically, it contends that subject imports from each source and the domestic like product are fungible, sold in the same geographic regions, simultaneously present in the U.S. market, and sold through the same channels of distribution.<sup>51</sup>

#### **B. Analysis**

The statutory threshold for cumulation is satisfied in these investigations because Petitioner filed the antidumping duty petitions with respect to all three countries and the countervailing duty petition with respect to India on the same day, October 12, 2022.<sup>52</sup> As discussed below, the record in the final phase of these investigations continues to demonstrate

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<sup>48</sup> See, e.g., *Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int’l Trade 1989).

<sup>49</sup> The Statement of Administrative Action (SAA) to the Uruguay Round Agreements Act (URAA), expressly states that “the new section will not affect current Commission practice under which the statutory requirement is satisfied if there is a reasonable overlap of competition.” H.R. Rep. No. 103-316, Vol. I at 848 (1994) (citing *Fundicao Tupy, S.A. v. United States*, 678 F. Supp. at 902; see *Goss Graphic Sys., Inc. v. United States*, 33 F. Supp. 2d 1082, 1087 (Ct. Int’l Trade 1998) (“cumulation does not require two products to be highly fungible”); *Wieland Werke, AG*, 718 F. Supp. at 52 (“Completely overlapping markets are not required.”)).

<sup>50</sup> Petitioner’s Prehearing Br. at 14; Petitioner’s Posthearing Br. at 2.

<sup>51</sup> Petitioner’s Prehearing Br. at 14-18; Petitioner’s Posthearing Br. at 2-4.

<sup>52</sup> None of the statutory exceptions to cumulation apply.

that there is a reasonable overlap of competition between the domestic like product and imports from China, India, and Vietnam, and among imports from each subject country.

*Fungibility.* The record indicates that domestically produced PFFs and subject imports from each subject country are fungible.<sup>53</sup> Both responding U.S. producers and nearly all responding importers reported that PFFs from each subject source are always interchangeable with each other as well as the domestic like product.<sup>54</sup> All responding purchasers reported that PFFs across all sources are always or frequently interchangeable.<sup>55</sup>

The record also indicates that domestically produced PFFs and imports from each source generally consisted of the same types of PFFs in 2022.<sup>56</sup> Manila folders accounted for the majority of PFFs sold from each source.<sup>57</sup> Hanging folders accounted for the second largest share of U.S. producers' sales, whereas folders other than manila, hanging, fastener, or expanding accounted for the second largest share of U.S. importers' sales of subject imports from each subject source.<sup>58</sup>

*Channels of Distribution.* During the POI, domestically produced PFFs and imports from China and Vietnam were sold primarily to retailers, as were \*\*\* subject imports from India.<sup>59</sup> The remainder of domestically produced PFFs were sold to distributors, followed by end-users, whereas the remainder of subject imports from China were sold to distributors in all but one

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<sup>53</sup> CR/PR at II-11.

<sup>54</sup> CR/PR at Tables II-11-II-12.

<sup>55</sup> CR/PR at Table II-13.

<sup>56</sup> See CR/PR at Table IV-6. Appendix E, at Table E-1, also indicates that domestically produced PFFs and subject imports from each source were sold in overlapping forms throughout the POI.

<sup>57</sup> CR/PR at Table IV-6.

<sup>58</sup> CR/PR at Table IV-6.

<sup>59</sup> CR/PR at Table II-1.

year, and the remainder of subject imports from Vietnam were sold to end-users.<sup>60</sup> The record thus shows that domestically produced PFFs and subject imports from China, India, and Vietnam overlapped with respect to channels of distribution.

*Geographic Overlap.* Domestically produced PFFs and imports from each subject country were sold in all geographic market areas of the United States.<sup>61</sup> In addition, imports from each subject country entered the United States through all borders of entry in substantial volumes in 2022.<sup>62</sup> The record thus shows that imports from each subject country and domestically produced PFFs were sold in overlapping geographical areas.

*Simultaneous Presence in Market.* Official U.S. import statistics indicate that imports of PFFs from each subject source were present in the U.S. market with the domestic like product in every month of the POI.<sup>63</sup>

*Conclusion.* The record shows that imports from each subject country are fungible with the domestic like product and with each other, and that subject imports from each subject country and the domestic like product overlapped in terms of channels of distribution and geographic markets. The record also indicates that imports from each subject country and the domestic like product were simultaneously present in the U.S. market. Because the record indicates that there is a reasonable overlap of competition between and among imports from each subject country and the domestic like product, we cumulate subject imports from China, India, and Vietnam for purposes of our material injury analysis.

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<sup>60</sup> CR/PR at Table II-1. In 2020, the remainder of subject imports from China were sold to end-users, followed by distributors. *Id.*

<sup>61</sup> CR/PR at Table II-2.

<sup>62</sup> CR/PR at Table IV-8.

<sup>63</sup> CR/PR at Table IV-9.

## **VI. Material Injury by Reason of Subject Imports**

Based on the record in the final phase of these investigations, we find that an industry in the United States is materially injured by reason of imports of PFFs from China, India, and Vietnam that Commerce has found to be sold in the United States at LTFV and to be subsidized by the government of India.

### **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.<sup>64</sup> 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.<sup>65</sup> The statute defines “material injury” as “harm which is not inconsequential, immaterial, or unimportant.”<sup>66</sup> 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.<sup>67</sup> No 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.”<sup>68</sup>

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<sup>64</sup> 19 U.S.C. §§ 1671d(b), 1673d(b).

<sup>65</sup> 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).

<sup>66</sup> 19 U.S.C. § 1677(7)(A).

<sup>67</sup> 19 U.S.C. § 1677(7)(C)(iii).

<sup>68</sup> 19 U.S.C. § 1677(7)(C)(iii).

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,<sup>69</sup> 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.<sup>70</sup> 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.<sup>71</sup>

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

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<sup>69</sup> 19 U.S.C. §§ 1671d(b), 1673d(b).

<sup>70</sup> *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).

<sup>71</sup> 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. USITC*, 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. USITC*, 266 F.3d 1339, 1345 (Fed. Cir. 2001).

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.<sup>72</sup> In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.<sup>73</sup> 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.<sup>74</sup> It is

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<sup>72</sup> SAA 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 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.

<sup>73</sup> 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.”).

<sup>74</sup> S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.



clear that the existence of injury caused by other factors does not compel a negative determination.<sup>75</sup>

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.”<sup>76</sup> 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 sources to the subject imports.”<sup>77</sup> The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed “rigid adherence to a specific formula.”<sup>78</sup>

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

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<sup>75</sup> 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.”).

<sup>76</sup> *Mittal Steel*, 542 F.3d at 876 &78; 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 *Swift-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission’s causation analysis as comports with the Court’s guidance in *Mittal*.

<sup>77</sup> *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.

<sup>78</sup> *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.”).

evidence standard.<sup>79</sup> Congress has delegated this factual finding to the Commission because of the agency's institutional expertise in resolving injury issues.<sup>80</sup>

## **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**

PFFs are generally used to organize U.S. letter- and legal-sized documents in professional and home office settings.<sup>81</sup> U.S. demand for PFFs is driven by overall economic activity, white collar employment, and office occupancy rates.<sup>82</sup> Two of three U.S. producers, three of seven responding U.S. importers, and three of six purchasers indicated that the U.S. market for PFFs was subject to business cycles, with demand for PFFs increasing around the beginning of the year, the tax filing season, and the start of the schoolyear.<sup>83</sup>

Most U.S. producers, importers, and purchasers reported that demand for PFFs in the U.S. market fluctuated down or steadily decreased since the start of the POI.<sup>84</sup> The record indicates that environmental concerns and the digitization of office records have impacted demand for PFFs.<sup>85</sup> Apparent U.S. consumption of PFFs increased from 2020 to 2022, from \*\*\*

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<sup>79</sup> We provide in our discussion below a full analysis of other factors alleged to have caused any material injury experienced by the domestic industry.

<sup>80</sup> *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.”).

<sup>81</sup> CR/PR at II-1. Two of three U.S. producers, four of seven responding importers, and four of six responding purchasers reported that poly folders are substitutes for PFFs. CR/PR at II-10.

<sup>82</sup> Conf. Tr. at 86 (Roberts).

<sup>83</sup> CR/PR at II-9.

<sup>84</sup> CR/PR at Table II-4.

<sup>85</sup> Conf. Tr. at 84 (Avent), 152 (Vaughn) (characterizing these factors as long-term trends).

PFFs in 2020 to \*\*\* PFFs in 2021, and \*\*\* PFFs in 2022; it was \*\*\* PFFs in interim 2023, down from \*\*\* PFFs in interim 2022.<sup>86</sup>

## 2. Supply Considerations

The domestic industry, consisting of three firms (BSP Filings, Smead, and TOPS),<sup>87</sup> was the largest source of PFFs in the U.S. market from 2020 through 2022, and the second largest source of supply in interim 2023, following subject imports. Its share of apparent U.S. consumption, by quantity, declined from \*\*\* percent in 2020 and 2021 to \*\*\* percent in 2022; it was \*\*\* percent in interim 2023, down from \*\*\* percent in interim 2022.<sup>88</sup>

The domestic industry reported sufficient installed overall capacity to supply the entire U.S. market,<sup>89</sup> though it declined irregularly during the POI, from \*\*\* folders in 2020 to \*\*\* folders in 2021, and \*\*\* folders in 2022; it was \*\*\* folders in both interim periods.<sup>90</sup> Its reported practical capacity, the level of production the industry could reasonably have expected to attain with its actual employment levels and raw material supply, also declined irregularly during the POI, from \*\*\* folders in 2020 to \*\*\* folders in 2021, and \*\*\* folders in 2022; it was \*\*\* folders in both interim periods.<sup>91</sup>

Subject imports were the third largest source of PFFs in 2020 and 2021, overtook nonsubject imports as the second largest source of PFFs in 2022, and overtook the domestic industry as the largest source of PFFs in interim 2023. By quantity, their share of apparent U.S.

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<sup>86</sup> CR/PR at Table IV-10.

<sup>87</sup> CR/PR at Table III-1. Smead reported closing a plant in Texas, expanding two other plants in Ohio and Utah, and temporarily shuttering the Ohio plant during the COVID-19 pandemic. *Id.* at Table III-2.

<sup>88</sup> CR/PR at Table IV-10.

<sup>89</sup> *Compare* CR/PR at Table III-5 *with* Table IV-10.

<sup>90</sup> CR/PR at Table III-5.

<sup>91</sup> CR/PR at Table III-5.

consumption increased from \*\*\* percent in 2020 to \*\*\* percent in 2021, and \*\*\* percent in 2022; it was \*\*\* percent in interim 2023, up from \*\*\* percent in interim 2022.<sup>92</sup>

Nonsubject imports were the second largest source of PFFs in 2020 and 2021, and then fell to the third largest source of PFFs for the remainder of the POI. By quantity, their share of apparent U.S. consumption declined from \*\*\* percent in 2020 to \*\*\* percent in 2021, and \*\*\* percent in 2022; their share was \*\*\* percent in interim 2023, down from \*\*\* percent in interim 2022.<sup>93</sup> U.S. imports from Mexico accounted for the majority of total imports from 2020 through 2021, and virtually all nonsubject imports throughout the POI.<sup>94</sup>

Two U.S. producers and one importer reported that they experienced supply constraints between January 1, 2020 and October 12, 2022, the date on which the petitions were filed. U.S. producers report that these supply constraints were due to the COVID-19 pandemic; no firm reported supply constraints since the filing of the petitions.<sup>95</sup> Petitioner argues that the domestic industry is capable of supplying the entire U.S. market and could have produced more PFFs during the POI had it not lost sales and market share to subject imports.<sup>96</sup> As discussed above, the domestic industry possessed substantial and increasing unused capacity throughout the period of investigation, ranging from \*\*\* PFFs to \*\*\* PFFs, when the industry's rate of capacity utilization also declined.<sup>97</sup>

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<sup>92</sup> CR/PR at Table IV-10.

<sup>93</sup> CR/PR at Table IV-10.

<sup>94</sup> CR/PR at Table IV-2. Smead and TOPS operated PFF production facilities in Mexico during the POI. *Id.* at VII-29 n.30. Smead reported that it closed its facility in Reynoso, Mexico in 2020, and moved this nonsubject production to its various domestic PFF production facilities. Conf. Tr. at 27 (Avent).

<sup>95</sup> CR/PR at II-8-II-9, Table VI-12.

<sup>96</sup> Petitioner's Posthearing Br., Exh. 1, Response to Written Questions from Commission Staff, at 2-3.

<sup>97</sup> See CR/PR at Table III-5.

### 3. Substitutability and Other Conditions

We find that there is a high degree of substitutability between domestically produced PFFs and subject imports.<sup>98</sup> As discussed above, domestically produced PFFs and subject imports were sold in overlapping forms throughout the POI, and both responding U.S. producers and nearly all responding importers reported that PFFs from each subject source were always interchangeable.<sup>99</sup> Moreover, both U.S. producers and most responding importers reported that differences other than price were sometimes or never significant.<sup>100</sup> Purchaser responses were more varied; with the exception of the U.S. and India country pairing, at least half of responding purchasers reported that differences other than price were sometimes or never significant.<sup>101</sup>

We also find that price is an important purchasing factor, in addition to quality. Three responding purchasers identified quality as the first-most important purchasing factor and price/cost and quality as the second-most important purchasing factors, whereas two firms each identified price/cost, availability/supply, and other factors as the third-most important purchasing factors.<sup>102</sup> Three purchasers each reported that they usually or sometimes purchase the lowest-price product; no purchaser reported always or never purchasing the

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<sup>98</sup> CR/PR at II-11.

<sup>99</sup> See Section V.B. above.

<sup>100</sup> CR/PR at Tables II-14-II-15.

<sup>101</sup> CR/PR at Table II-16. Three purchasers reported that differences other than price were always or frequently significant purchasing factors; one purchaser reported that they were sometimes significant purchasing factors. *Id.*

<sup>102</sup> CR/PR at Table II-6.

lowest-priced product.<sup>103</sup> Further, purchasers rated subject imports from each source and the domestic like product as comparable in terms of most non-price factors.<sup>104</sup>

PFFs are primarily sold from inventory. U.S. producers reported that \*\*\* percent of their U.S. shipments were sold from inventory with lead times of \*\*\* days, with the remaining \*\*\* percent produced-to-order with lead times of \*\*\* days.<sup>105</sup> Importers reported that \*\*\* percent of their U.S. shipments were sold from inventory with lead times of \*\*\* days, \*\*\* percent were sold from foreign inventories, with lead times of \*\*\* days, and the remaining \*\*\* percent were produced-to-order, with lead times of \*\*\* days.<sup>106</sup> With respect to selling methods, domestic and subject imported PFFs are sold predominantly under annual contracts.<sup>107</sup>

Information on the record indicates that large purchasers purchased both branded PFFs and PFFs for sale to end-use customers under their private labels.<sup>108</sup> The record also indicates that the COVID-19 pandemic caused supply chain disruptions and lowered demand for PFFs at the beginning of the POI.<sup>109</sup>

The primary raw material used to produce PFFs is rolls of uncoated freesheet paper.<sup>110</sup> Overall, raw materials as a share of the domestic industry's cost of goods sold ("COGS") declined irregularly during the POI. Raw materials as a share of COGS declined slightly from \*\*\*

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<sup>103</sup> CR/PR at II-12.

<sup>104</sup> CR/PR at Table II-10.

<sup>105</sup> CR/PR at II-13.

<sup>106</sup> CR/PR at II-13.

<sup>107</sup> CR/PR at Table V-2.

<sup>108</sup> Conf. Tr. at 29-30 (Avent). Purchasers reported buying more than twice as many private label PFFs as branded PFFs during the POI. See Worksheet, EDIS Doc. No. 806625 (Oct. 23, 2023) at 79.

<sup>109</sup> Conf. Tr. at 22-23 (Roberts).

<sup>110</sup> CR/PR at V-1. Other components include metal fasteners and steel rods. *Id.*

percent in 2020 to \*\*\* percent in 2021, and \*\*\* percent in 2022, and was lower in interim 2023 at \*\*\* percent, compared to interim 2022 at \*\*\* percent.<sup>111</sup>

Imports of PFFs from China entering under HTS subheading 4820.30.00 became subject to additional 10 percent *ad valorem* duties pursuant to section 301 of the Tariff Act of 1974,<sup>112</sup> effective September 24, 2018. Effective May 10, 2019, these duties were increased to 25 percent.<sup>113</sup> Two of three responding U.S. producers, five of eight responding importers, and two of seven responding purchasers reported that these duties had an impact on the U.S. market, while one producer, one importer, and three purchasers reported that they did not know whether the duties had an impact on the market.<sup>114</sup>

### **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.”<sup>115</sup>

Cumulated subject imports increased during the POI, from \*\*\* folders in 2020 to \*\*\* folders in 2021, and \*\*\* folders in 2022; they were \*\*\* folders in interim 2023, up from \*\*\* folders in interim 2022.<sup>116</sup>

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<sup>111</sup> CR/PR at Table VI-1.

<sup>112</sup> 19 U.S.C. § 2411.

<sup>113</sup> CR/PR at I-9.

<sup>114</sup> CR/PR at II-2.

<sup>115</sup> 19 U.S.C. § 1677(7)(C)(i).

<sup>116</sup> CR/PR at Table IV-2.

As a share of apparent consumption, cumulated subject imports' market share, by quantity, also increased from \*\*\* percent in 2020 to \*\*\* percent in 2021, and \*\*\* percent in 2022; it was \*\*\* percent in interim 2023, up from \*\*\* percent in interim 2022.<sup>117</sup>

Cumulated subject imports also increased as a ratio to domestic industry production during the POI, from \*\*\* percent in 2020 to \*\*\* percent in 2021, and \*\*\* percent in 2022; the ratio was \*\*\* percent in interim 2023, up from \*\*\* percent in interim 2022.<sup>118</sup>

We find that the volume of cumulated subject imports and the increase in that volume were significant over the POI, both in absolute terms and relative to consumption and production in the United States.

#### **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.<sup>119</sup>

As discussed in section VI.B.3 above, the record indicates that there is a high degree of substitutability between domestically produced PFFs and the subject merchandise, and that price is an important factor in purchasing decisions, in addition to quality.<sup>120</sup>

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<sup>117</sup> CR/PR at Table IV-10.

<sup>118</sup> CR/PR at Table IV-10.

<sup>119</sup> 19 U.S.C. § 1677(7)(C)(ii).

<sup>120</sup> See Section VI.B.3 above.



The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. values of seven pricing products sold to unrelated customers during the POI.<sup>121</sup> Three U.S. producers and \*\*\* importer provided usable pricing data for sales of the requested products, although no firm reported pricing data for all products for all quarters and

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<sup>121</sup> CR/PR at V-6. The seven pricing products were as follows:

**Product 1.** – Packages of up to 25 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right);

**Product 2.** – Boxes of 75 to 99 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right);

**Product 3.** – Boxes of 100 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled postconsumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right);

**Product 4.** – Boxes of 125 to 150 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right);

**Product 5.** – Boxes of 250 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled postconsumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right);

**Product 6.** – Boxes of 20 to 25 hanging file folders, standard green color, letter size, made from uncoated freesheet paperboard, 11 points thickness, 126 to 144 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), metal rod with small indentations or hooks on the end, and the ends of the rods coated. The box also contains the same number of plastic tabs, each of which is 1/5 cut size, and white paper inserts as the box size; and

**Product 7.** – Boxes of up to 50 fastener folders, manila color, letter size, two embedded and stamped 2 inch fasteners, made from uncoated freesheet paperboard, 11 points thickness, 118 to 128 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled postconsumer waste, with an extended reinforced paper tab on the back flap visible above the height of the front flap and one 1/3 reinforced tab in one of three positions (left, center, right). *Id.* at V-6-V-7.

no importer reported pricing data allowing for quarterly comparisons between subject imports from any source and the domestic like product.<sup>122</sup>

Firms that imported subject merchandise for their own use, repacking, and/or retail sale were also requested to provide import purchase cost data. Four importers provided information for the requested products, although no firm reported pricing data for all products for all quarters. Purchase cost data reported by these firms accounted for approximately \*\*\* percent of imports from India, and \*\*\* percent of imports from Vietnam.<sup>123</sup>

The purchase cost data indicate that landed duty-paid costs for cumulated subject imports were below the sales prices of the domestic like product in \*\*\* of \*\*\* quarterly comparisons (\*\*\* percent of quarterly comparisons) involving \*\*\* PFFs at price-cost differentials ranging from 0.3 percent to 69.4 percent and averaging 27.9 percent. Landed duty-paid costs for cumulated subject imports were above the sales prices of the domestic like product in the remaining \*\*\* quarterly comparisons (\*\*\* percent of quarterly comparisons) involving \*\*\* PFFs at price-cost differentials ranging from 0.7 percent to 389.6 percent and averaging 47.4 percent.<sup>124</sup> Quarters in which landed duty-paid costs for cumulated subject imports were below the sales prices of the domestic like product accounted for a substantial portion, \*\*\* percent, of reported subject import purchase cost data by volume.<sup>125</sup> Moreover, information on the record indicates that the number of quarters during which landed duty-paid

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<sup>122</sup> CR/PR at V-8 and Tables V-3-V-9.

<sup>123</sup> CR/PR at V-22. Purchase cost data reported with respect to imports from China did not allow for comparison between subject merchandise from China and the domestic like product. *Id.* at V-22 and Tables V-10-V-16.

<sup>124</sup> CR/PR at Tables V-19-V-21.

<sup>125</sup> CR/PR at Tables V-19-V-21.

costs for cumulated subject imports were below the sales prices of the domestic like product increased towards the end of the POI.<sup>126</sup>

We recognize that the import purchase cost data may not reflect the total cost of importing, and therefore requested that importers provide additional information regarding the costs and benefits of importing PFFs themselves. Three importers reported incurring additional costs beyond the landed duty-paid costs associated with importing PFFs, including charges in connection with ensuring adequate inventories, carrying costs, freight, warehousing fees, demurrage charges, detention fees, bobtail fees, and transload fees, as additional costs.<sup>127</sup> Two of these importers estimated these additional costs at \*\*\* percent compared to the landed duty-paid value.<sup>128</sup> Given that the subject import purchase costs were, on average, 27.9 percent below domestic sales prices, these additional costs amounted to \*\*\* less than the average price-cost differential.<sup>129</sup>

We have also considered purchasers' responses regarding lost sales/lost revenue. Four of seven responding purchasers reported that subject import prices were lower than the prices of domestically produced PFFs.<sup>130</sup> Two of these purchasers, \*\*\* and \*\*\*, reported that price

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<sup>126</sup> CR/PR at Table V-21. The number of quarters in which subject import purchase costs were lower than the sales prices of the domestic like product increased irregularly, from seven quarters in 2020 to two quarters in 2021 and 29 quarters of 2022. CR/PR at Table V-21. They totaled 18 quarters in interim 2023, on course to match or exceed the figure reported for 2022. *Id.*

<sup>127</sup> CR/PR at V-22.

<sup>128</sup> CR/PR at V-22.

<sup>129</sup> Four firms reported that the cost of importing PFFs themselves, inclusive of such costs, were lower than the cost of purchasing PFFs domestically; while three firms reported that direct import costs were higher inclusive of additional costs than purchasing PFFs domestically. CR/PR at V-22-V-23. In determining whether to directly import PFFs, four responding importers each reported that they compare costs of importing to the cost of purchasing from a U.S. producer or U.S. importer; one firm, \*\*\*, reported that it does not compare costs of purchasing from either U.S. producers or importers. *Id.* at V-23.

<sup>130</sup> CR/PR at Table V-23.

was a primary reason for purchasing \*\*\* subject imported folders instead of the domestic like product, equivalent to \*\*\* percent of the \*\*\* PFFs purchased or imported by responding purchasers during the POI, and \*\*\* of subject imports reported by all responding purchasers during the period.<sup>131</sup>

Other record information corroborates that cumulated subject imports were generally priced lower than the domestic like product. Purchaser questionnaire responses regarding the comparability of domestic PFFs and subject imports with respect to a number of purchasing factors indicate that U.S. prices were reported as being “inferior” to subject import prices by three of four responding purchasers with respect to China, all four responding purchasers with respect to India, and two of three responding purchasers with respect to Vietnam.<sup>132</sup>

Additionally, the record contains average unit value (“AUV”) data compiled for a range of product types showing that the AUVs of U.S. shipments of subject imports were generally lower than the AUVs of the domestic industry's U.S. shipments of comparable products.<sup>133</sup>

Given the high degree of substitutability between subject imports and the domestic like product, the importance of price in purchasing decisions, the purchase cost data, information concerning lost sales, and other record information showing that cumulated subject imports

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<sup>131</sup> CR/PR at Tables V-22-V-24. \*\*\* reported that it switched to subject imports after TOPS failed to meet certain paperweight minimum standards for sales of its private label manila file folders. *Id.* at V-51. Petitioner contends that \*\*\* confused the paperweight minimum standards for colored folders, which generally use a heavier paperweight, with the standards for manila folders, such that \*\*\* Petitioner’s Posthearing Br., Exh. 1 at 1-2. Petitioner submits a sworn affidavit from a TOPS executive containing an email correspondence from a \*\*\* purchasing agent indicating that it was “exiting TOPS’ private brand. . . due to continued cost pressures.” *Id.*, Exh. 2 (Garber Decl.) at 1-2, Att.

<sup>132</sup> CR/PR at Table II-10.

<sup>133</sup> CR/PR at Table E-1. These data indicate that domestic producers’ U.S. shipment AUVs for manila folders and fastener folders were higher than importers’ U.S. shipment AUVs from any source, whereas domestic producers’ U.S. shipment AUVs for hanging folders, expanding folders, and other folders were below only importers’ U.S. shipment AUVs from China. *Id.*

were lower priced than the domestic like product, we find that there has been significant price underselling of the domestic like product by subject imports during the POI. The underselling by subject imports led to a market share shift of \*\*\* percentage points from the domestic industry to subject imports from 2020 to 2022, and \*\*\* percentage points in interim 2023 compared to interim 2022.<sup>134</sup>

We have also considered price trends during the POI. The pricing data indicate that prices for domestically produced PFFs increased for all reported pricing products, although prices for certain products, particularly pricing product 1, fluctuated between the second quarters of 2020 and 2021 before rising between the end of 2021 and the second half of 2022.<sup>135</sup> Domestic producer prices for pricing products 1, 3, 4, 5, 6, and 7 increased by \*\*\* percent, \*\*\* percent, \*\*\* percent, \*\*\* percent, \*\*\* percent, and \*\*\* percent, respectively, over the POI.<sup>136</sup> The available purchase cost data indicate that subject imports' landed duty-paid purchase costs increased for all pricing products for which data were available, with the exception of pricing product 7 from Vietnam.<sup>137</sup> Consistent with these data, no responding purchasers reported that U.S. producers had reduced their prices to compete with lower-priced subject imports from any subject country.<sup>138</sup>

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<sup>134</sup> CR/PR at Tables IV-10, C-1.

<sup>135</sup> CR/PR at Tables V-3-V-9.

<sup>136</sup> CR/PR at Table V-17.

<sup>137</sup> CR/PR at Table V-18. Subject landed duty-paid purchase costs declined by \*\*\* percent for this pricing product. *Id.* The other pricing products for which subject import purchase cost data were available were pricing product 3 from Vietnam, which increased by \*\*\* percent, and pricing product 6 from \*\*\*, which increased by \*\*\* percent. *Id.*

<sup>138</sup> CR/PR at V-49. Petitioner argues that lost sales of lower-value products to cumulated subject imports towards the end of the POI, particularly by \*\*\*, skewed the AUVs of the domestic industry's U.S. shipments towards higher-value products in 2022 and interim 2023. Petitioner's Posthearing Br., Exh. 1 at 4-8, Exh. 2 at 3-4 (Garber Decl.), Exh. 3 at 2 (Beckman Decl.).

We have also examined whether subject imports prevented price increases which otherwise would have occurred. The domestic industry's COGS to net sales ratio declined irregularly during the POI, from \*\*\* percent in 2020 to \*\*\* percent in 2021, and \*\*\* percent in 2022; it was \*\*\* percent in interim 2023, down from \*\*\* percent in interim 2022.<sup>139</sup> The decline in this ratio is consistent with the U.S. producers' ability to successfully increase their net sales AUVs by a greater amount than the increase to their unit COGS over the POI. Specifically, between 2020 and 2022, the domestic industry's net sales AUVs increased by \*\*\*, from \*\*\* to \*\*\* to \*\*\*, whereas its unit COGS only increased by \*\*\*, from \*\*\* to \*\*\* to \*\*\*.<sup>140</sup>

We find that significant underselling by cumulated subject imports enabled the increasing volume of cumulated subject imports to take sales and market share from the domestic industry during the POI. We therefore find that cumulated subject imports had significant price effects.

#### **E. Impact of the Subject Imports<sup>141</sup>**

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

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<sup>139</sup> CR/PR at Table VI-1.

<sup>140</sup> CR/PR at Tables VI-1-VI-2.

<sup>141</sup> The statute instructs the Commission to consider the "magnitude of the dumping margin" in an antidumping proceeding as part of its consideration of the impact of imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final determinations of sales at LTFV, Commerce found dumping margins of 192.70 percent for subject imports from China, 17.22 to 86.01 percent for subject imports from India, and 97.52 to 233.93 percent for subject imports from Vietnam. *Paper File Folders From the People's Republic of China: Final Affirmative Determination of Sales at Less-Than-Fair Value*, 88 Fed. Reg. 69,141, 69,142 (Oct. 5, 2023); *Paper File Folders From India: Final Affirmative Determination of Sales at Less Than Fair Value*, 88 Fed. Reg. 69,138, 69,140-69,141 (Oct. 5, 2023); *Paper File Folders From the Socialist Republic of Vietnam: Final Affirmative Determination of Sales at Less-Than-Fair-Value Investigation*, 88 Fed. Reg. 69,130, 69,131-69,132 (Oct. 5, 2023). We take into account in our analysis the fact that Commerce has made final findings that all subject producers in China, India, and Vietnam are selling (Continued...)

the state of the industry.”<sup>142</sup> 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, and factors affecting domestic prices. No 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.”<sup>143</sup>

The record shows that the domestic industry’s trade measures and financial performance declined according to most measures during the POI, driven by the industry’s declining production and capacity utilization.<sup>144</sup> As apparent U.S. consumption increased from 2020 to 2022, the domestic industry lost \*\*\* percentage points of market share to subject imports during the period, and another \*\*\* percentage points between the interim periods.<sup>145</sup>

All of the domestic industry’s output-related indicators declined during the POI. The industry’s practical capacity declined irregularly by \*\*\* percent from 2020 through 2022, from \*\*\* folders in 2020 to \*\*\* folders in 2021 and 2022; it was \*\*\* folders in both interim periods.<sup>146</sup> The industry’s production declined irregularly by \*\*\* percent from 2020 through

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subject imports in the United States at LTFV. 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 cumulated subject imports.

<sup>142</sup> 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.”).

<sup>143</sup> 19 U.S.C. § 1677(7)(C)(iii). This provision was amended by the Trade Preferences Extension Act of 2015, Pub. L. 114-27.

<sup>144</sup> CR/PR at Table III-5.

<sup>145</sup> CR/PR at Table IV-10.

<sup>146</sup> CR/PR at Table III-5, C-1.

2022, from \*\*\* folders in 2020 and 2021 to \*\*\* folders in 2022; it was \*\*\* percent lower in interim 2023, at \*\*\* folders, compared to interim 2022, at \*\*\* folders.<sup>147</sup> Its capacity utilization declined irregularly by \*\*\* percentage points from 2020 through 2022, from \*\*\* percent in 2020 to \*\*\* percent in 2021, and \*\*\* percent in 2022; it was \*\*\* percentage points lower in interim 2023, at \*\*\* percent, compared to interim 2022, at \*\*\* percent.<sup>148</sup>

The domestic industry's employment-related performance indicators were mixed during the POI. Employment in terms of the number of production and related workers ("PRWs") increased irregularly by \*\*\* percent from 2020 through 2022; it was \*\*\* percent lower in interim 2023, compared to interim 2022.<sup>149</sup> Hourly wages and unit labor costs also increased during the POI.<sup>150</sup> Productivity and wages paid both declined irregularly during the POI. Productivity declined by \*\*\* percent from 2020 through 2022; it was \*\*\* percent lower in interim 2023, compared to interim 2022.<sup>151</sup> Wages paid declined by \*\*\* percent from 2020

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<sup>147</sup> CR/PR at Tables III-5, C-1.

<sup>148</sup> CR/PR at Tables III-5, C-1.

<sup>149</sup> Employment was \*\*\* PRWs in 2020, \*\*\* PRWs in 2021, \*\*\* PRWs in 2022, \*\*\* PRWs in interim 2022, and \*\*\* PRWs in interim 2023. CR/PR at Tables III-12, C-1.

<sup>150</sup> Hourly wages increased by \*\*\* percent from 2020 through 2022, from \$\*\*\* per hour in 2020 to \$\*\*\* per hour in 2021, and \$\*\*\* in 2022; they were \*\*\* percent higher in interim 2023, at \$\*\*\* per hour, compared to interim 2022, at \$\*\*\* per hour. CR/PR at Tables III-12, C-1.

Unit labor costs increased irregularly by \*\*\* percent from 2020 through 2022, from \$\*\*\* per 1,000 folders in 2020 to \$\*\*\* per 1,000 folders in 2021, and \$\*\*\* per 1,000 folders in 2022; they were \*\*\* percent higher in interim 2023, at \$\*\*\* per 1,000 folders, compared to interim 2022, at \$\*\*\* per 1,000 folders. CR/PR at Tables III-12, C-1.

<sup>151</sup> Productivity was \*\*\* folders per hour in 2020, \*\*\* folders per hour in 2021, \*\*\* folders in 2022, \*\*\* folders in interim 2022, and \*\*\* folders in interim 2023. CR/PR at Tables III-12, C-1.



through 2022, and were \*\*\* percent lower in interim 2023, compared to interim 2022.<sup>152</sup> Total hours worked and hours worked per PRW both declined throughout the POI.<sup>153</sup>

The domestic industry's U.S. shipments declined by \*\*\* percent from 2020 through 2022, from \*\*\* folders in 2020 to \*\*\* folders in 2021, and \*\*\* folders in 2022; they were \*\*\* percent lower in interim 2023, at \*\*\* folders, compared to interim 2022, at \*\*\* folders.<sup>154</sup> As discussed above, the domestic industry's market share declined by \*\*\* percentage points from \*\*\* percent in 2020 to \*\*\* percent in 2022, and was \*\*\* percentage points lower in interim 2023, at \*\*\* percent, than in interim 2022, at \*\*\* percent.<sup>155</sup>

The domestic industry's end-of-period inventories declined throughout the POI, from \*\*\* folders in 2020 to \*\*\* folders in 2021, and \*\*\* folders in 2022, a level \*\*\* percent lower than in 2020; it was \*\*\* percent lower in interim 2023, at \*\*\* folders, compared to \*\*\* folders in interim 2022.<sup>156</sup> As a share of total shipments, the domestic industry's end-of-period inventories declined from \*\*\* percent in 2020 to \*\*\* percent in 2021, and \*\*\* percent in 2022, a level \*\*\* percentage points lower than in 2020; it was \*\*\* percentage points lower interim 2023, at \*\*\* percent, compared to \*\*\* percent in interim 2022.<sup>157</sup>

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<sup>152</sup> Wages paid totaled \$\*\*\* in 2020, \$\*\*\* in 2021, \$\*\*\* in 2022, \$\*\*\* in interim 2022, and \$\*\*\* in interim 2023. CR/PR at Tables III-12, C-1.

<sup>153</sup> Total hours worked totaled \*\*\* hours in 2020, \*\*\* hours in 2021, \*\*\* hours in 2022, \*\*\* hours in interim 2022, and \*\*\* hours in interim 2023. CR/PR at Tables III-12, C-1.

Hours worked per PRW were \*\*\* hours in 2020, \*\*\* hours in 2021, \*\*\* hours in 2022, \*\*\* hours in interim 2022, and \*\*\* hours in interim 2023. CR/PR at Table III-12.

<sup>154</sup> CR/PR at Tables III-9, C-1.

<sup>155</sup> CR/PR at Tables IV-10, C-1. The domestic industry's market share was \*\*\* percent in 2020 and 2021, \*\*\* percent in 2022, \*\*\* percent in interim 2022, and \*\*\* percent in interim 2023. *Id.*

<sup>156</sup> CR/PR at Tables III-10, C-1.

<sup>157</sup> CR/PR at Tables III-10, C-1.

The domestic industry's declining production and sales volumes resulted in a deterioration in a number of its financial performance indicators during the POI notwithstanding its higher sales prices and sales values, as the industry's fixed costs were spread over fewer units.<sup>158</sup> The industry's total net sales increased irregularly by \*\*\* percent from 2020 through 2022 as domestic producers sold fewer PFFs at higher prices, from \$\*\*\* in 2020 to \$\*\*\* in 2021, and \$\*\*\* in 2022; they were \*\*\* percent lower in interim 2023, at \$\*\*\*, compared to interim 2022, at \$\*\*\*.<sup>159</sup> The industry's gross profits also increased irregularly, by \*\*\* percent from 2020 through 2022, from \$\*\*\* in 2020 to \$\*\*\* in 2021, and \$\*\*\* in 2022; they were \*\*\* percent higher in interim 2023, at \$\*\*\*, compared to interim 2022, at \$\*\*\*.<sup>160</sup>

The domestic industry's operating income, operating income margin, and net income margin all declined from 2020 through 2022, then improved in interim 2023 compared to interim 2022.<sup>161</sup> The industry's operating income declined irregularly by \*\*\* percent from 2020 through 2022, from \$\*\*\* in 2020 to \$\*\*\* in 2021, and \$\*\*\* in 2022; it was \*\*\* percent higher in interim 2023, at \$\*\*\*, compared to interim 2022, at \$\*\*\*.<sup>162</sup> The industry's operating income margin declined irregularly by \*\*\* percentage points from 2020 through 2022, from \*\*\* percent in 2020 to \*\*\* percent in 2021, and \*\*\* percent in 2022; it was \*\*\* percentage points higher in interim 2023, at \*\*\* percent, compared to interim 2022, at \*\*\* percent.<sup>163</sup> The

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<sup>158</sup> The industry's total net sales quantity declined irregularly by \*\*\* percent from 2020 through 2022, from \*\*\* folders in 2020 to \*\*\* folders in 2021, and \*\*\* folders in 2022; it was \*\*\* percent lower in interim 2023, at \*\*\*, compared to interim 2022, at \*\*\* folders. CR/PR at Tables VI-1, C-1.

<sup>159</sup> CR/PR at Tables VI-1, C-1.

<sup>160</sup> CR/PR at Tables VI-1, C-1.

<sup>161</sup> We acknowledge that \*\*\* reported \*\*\* during the POI that resulted in increases to \*\*\* that were spread across a declining sales volume of PFFs. In addition, \*\*\* reported \*\*\*. CR/PR at VI-15. These expenses reduced the domestic industry's operating income during the period.

<sup>162</sup> CR/PR at Tables VI-1, C-1.

<sup>163</sup> CR/PR at Tables VI-1, C-1.

industry's net income margin declined by \*\*\* percentage points from 2020 through 2022, from \*\*\* percent in 2020 to \*\*\* percent in 2021, and \*\*\* percent in 2022; it was \*\*\* percentage points higher in interim 2023, at \*\*\* percent, compared to interim 2022, at \*\*\* percent.<sup>164</sup> The industry's return on assets also declined, irregularly, by \*\*\* percentage points from 2020 through 2022, from \*\*\* percent in 2020 to \*\*\* percent in 2021, and \*\*\* percent in 2022.<sup>165</sup>

The domestic industry's capital expenditures increased by \*\*\* percent from 2020 through 2022, from \$\*\*\* in 2020 to \$\*\*\* in 2021, and \$\*\*\* in 2022; it was \*\*\* percent higher in interim 2023, at \$\*\*\* compared to interim 2022, at \$\*\*\*.<sup>166</sup> The industry's research and development expenditures increased by \*\*\* percent from 2020 through 2022, from \$\*\*\* in 2020 to \$\*\*\* in 2021, and \$\*\*\* in 2022; they were \*\*\* percent higher in interim 2023, at \$\*\*\* compared to interim 2022, at \$\*\*\*.<sup>167</sup> Lastly, two of three responding U.S. producers reported that subject imports had negative effects on investment, growth, and development.<sup>168</sup>

We find that the significant and increasing volume of lower-priced cumulated subject imports captured sales and market share from the domestic industry throughout the POI. As the domestic industry lost \*\*\* percentage points of market share to cumulated subject imports from 2020 to 2022, and another \*\*\* percentage points of market share in interim 2023 compared to interim 2022, the industry's production, capacity utilization, and U.S. shipments declined, despite generally increasing apparent U.S. consumption. The domestic industry's declining capacity utilization, which drove up the industry's unit fixed costs, productivity, and

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<sup>164</sup> CR/PR at Tables VI-1, C-1.

<sup>165</sup> CR/PR at Table VI-10.

<sup>166</sup> CR/PR at Tables VI-5, C-1.

<sup>167</sup> CR/PR at Tables VI-7, C-1.

<sup>168</sup> CR/PR at Tables VI-13-VI-14.

U.S. shipments caused the industry's financial performance to deteriorate during the POI, notwithstanding increasing prices.<sup>169</sup> We find that cumulated subject imports had a significant impact on the domestic industry.

We have also considered whether there are other factors that may have had an impact on the domestic industry during the POI to ensure that we are not attributing injury from such other factors to cumulated subject imports. Apparent U.S. consumption increased by \*\*\* percent from 2020 through 2022, such that demand conditions cannot explain the domestic industry's declining performance during this period. Although apparent U.S. consumption was \*\*\* percent lower in interim 2023 compared to interim 2022, the effect of this lower level of demand on the domestic industry was exacerbated by the industry's loss of \*\*\* percentage points of market share to cumulated subject imports in interim 2023 compared to interim 2022.<sup>170</sup>

Nor could nonsubject imports explain the domestic industry's declining performance during the POI. Nonsubject imports declined in terms of both volume and market share throughout the POI, and were generally sold at higher prices than cumulated subject imports during the period, based upon the available pricing data.<sup>171</sup>

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<sup>169</sup> CR/PR at Tables IV-10, C-1. Petitioner argues that the declines to the domestic industry's performance also interrupted planned upgrades by \*\*\* and \*\*\* to their production operations. Petitioner's Prehearing Br. at 33-34.

<sup>170</sup> CR/PR at Tables IV-2, IV-10, V-21, C-1.

<sup>171</sup> CR/PR at Tables IV-2, IV-10, C-1, G-15. Nonsubject import volume declined irregularly from \*\*\* PFFs in 2020 to \*\*\* PFFs in 2021, and \*\*\* PFFs in 2022; it was lower in interim 2023, at \*\*\* PFFs, than in interim 2022, at \*\*\* PFFs. CR/PR at Table IV-2. Nonsubject import market share declined from \*\*\* percent in 2020 to \*\*\* percent in 2021, and \*\*\* percent in 2020; it was lower in interim 2023, at \*\*\* percent, than in interim 2022, at \*\*\* percent. *Id.* at Tables IV-10, C-1. The available purchase cost data indicate that nonsubject imports from Mexico were priced higher than nonsubject imports in all \*\*\* available quarterly comparisons. *Id.* at Table G-15.

Finally, the domestic industry's supply constraints prior to the filing of the petitions cannot explain the industry's declining performance during the POI.<sup>172</sup> As discussed in section VI.B.2 above, the domestic industry possessed substantial and increasing unused capacity throughout the POI with which it could have increased its production and U.S. shipments, had it not lost sales and market share to increasing volumes of low-priced cumulated subject imports.<sup>173</sup>

For the reasons discussed above, we conclude that the cumulated subject imports had a significant impact on the domestic industry.

## **VII. Conclusion**

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of subject imports of PFFs from China, India, and Vietnam that are sold in the United States at LTFV and subsidized by the government of India.

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<sup>172</sup> CR/PR at II-8-II-9.

<sup>173</sup> CR/PR at Table III-5.



# Part I: Introduction

## Background

These investigations result from petitions filed with the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (“USITC” or “Commission”) by the Coalition of Domestic Folder Manufacturers,<sup>1</sup> Hastings, Minnesota, and Naperville, Illinois on October 12, 2022, 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 paper file folders<sup>2</sup> from China, India, and Vietnam and subsidized imports of subject merchandise from India. Table I-1 presents information relating to the background of these investigations.<sup>3 4</sup>

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<sup>1</sup> Consisting of Smead Manufacturing Company, Inc. (“Smead”) and TOPS Products LLC (“TOPS”).

<sup>2</sup> See the section entitled “The subject merchandise” in Part I of this report for a complete description of the merchandise subject in this proceeding.

<sup>3</sup> Pertinent Federal Register notices are referenced in appendix A and may be found at the Commission’s website ([www.usitc.gov](http://www.usitc.gov)).

<sup>4</sup> Appendix B presents the Federal Register notice cancelling the Commission’s hearing.

**Table I-1****Paper file folders: Information relating to the background and schedule of this proceeding**

<b>Effective date</b>	<b>Action</b>
October 12, 2022	Petitions filed with Commerce and the Commission; institution of Commission investigations (87 FR 63526, October 19, 2022)
November 1, 2022	Commerce's notice of initiation of its China, India, and Vietnam antidumping duty investigations (87 FR 67441, November 8, 2022), and its India countervailing duty investigation (87 FR 67447, November 8, 2022)
November 28, 2022	Commission's preliminary determinations (87 FR 74167, December 2, 2022)
March 20, 2023	Commerce's preliminary countervailing duty determination with respect to India and alignment with final antidumping duty determination (88 FR 16590, March 20, 2023)
May 17, 2023	Commerce's preliminary antidumping duty determinations with respect to China, India, and Vietnam (88 FR 31485, 88 FR 31490, and 88 FR 31488, May 17, 2023) and scheduling of final phase of Commission investigations (88 FR 37579, June 8, 2023)
June 20, 2023	Commerce's amended preliminary antidumping duty determination with respect to Vietnam (88 FR 39825, June 20, 2023)
October 3, 2023	Scheduled date for the Commission's hearing. The hearing was subsequently cancelled (88 FR 68670, October 4, 2023)
October 5, 2023	Commerce's final antidumping determinations with respect to China, India, and Vietnam (88 FR 69141, 88 FR 69138, and 88 FR 69130, October 5, 2023) and final countervailing duty determination with respect to India (88 FR 69134, October 5, 2023)
October 31, 2023	Commission's vote
November 13, 2023	Commission's views

**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--<sup>5</sup>

*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.*

*In addition, Section 771(7)(J) of the Act (19 U.S.C. § 1677(7)(J)) provides that—<sup>6</sup>*

*(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.*

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<sup>5</sup> Amended by PL 114-27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

<sup>6</sup> Amended by PL 114-27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

## **Organization of report**

Part I of this report presents information on the subject merchandise, subsidy/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**

Paper file folders are generally used to hold documents or other records for professional office or home office organization. The leading U.S. producers of paper file folders are Smead Manufacturing Company, Inc. ("Smead") and TOPS Products LLC ("TOPS"), while leading producers of paper file folders outside the United States include \*\*\* in India, and \*\*\* in Vietnam. The leading U.S. importers of paper file folders from China are \*\*\*; the leading importers of paper file folders from India are \*\*\*; and the leading importers of paper file folders from Vietnam are \*\*\*. Leading importers of product from nonsubject countries (primarily Mexico) include \*\*\*. U.S. purchasers of paper file folders are large retailers; leading purchasers include \*\*\*.

Apparent U.S. consumption of paper file folders totaled approximately \*\*\* folders (\$\*\*\*) in 2022. Currently, four firms are known to produce paper file folders in the United States.<sup>7</sup> U.S. producers' U.S. shipments of paper file folders totaled \*\*\* folders (\$\*\*\*) in 2022, and accounted for \*\*\* percent of apparent U.S. consumption by quantity and \*\*\* percent by value. U.S. shipments of subject imports totaled \*\*\* folders (\$\*\*\*) in 2022, and accounted for \*\*\* percent of apparent U.S. consumption by quantity and \*\*\* percent by value. U.S. shipments of imports from nonsubject sources totaled \*\*\* folders (\$\*\*\*) in 2022, and accounted for \*\*\* percent of apparent U.S. consumption by quantity and \*\*\* percent by value.

## Summary data and data sources

A summary of data collected in these investigations is presented in appendix C, table C-1. Except as noted, U.S. industry data are based on questionnaire responses of three firms that are believed to account for the vast majority of U.S. production of paper file folders during 2022.<sup>8</sup> U.S. imports are based on questionnaire responses from 12 firms and official import statistics from Commerce.

## Previous and related investigations

Paper file folders have not been the subject of prior countervailing and antidumping duty investigations in the United States.

## Nature and extent of subsidies and sales at LTFV

### Subsidies

On October 5, 2023, Commerce published a notice in the Federal Register of its final determination of countervailable subsidies for producers and exporters of paper file folders from India.<sup>9</sup> Table I-2 presents Commerce's findings of subsidization of paper file folders in India.

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<sup>7</sup> In addition to the three firms that submitted a response to the Commission's questionnaire in this final phase, a fourth producer, STS Filing Products, submitted an incomplete response during the preliminary phase of these investigations. The firm reported producing \*\*\* folders in 2021.

<sup>8</sup> Smead and TOPS reported that they accounted for between \*\*\* percent of U.S. production in 2021. Petition, Volume I, p. 5.

<sup>9</sup> 88 FR 69134, October 5, 2023.

**Table I-2****Paper file folders: Commerce’s final subsidy determination with respect to imports from India**

Entity	Final countervailable subsidy rate (percent)
Navneet Education Ltd	3.78
Lotus Global Pvt. Ltd	90.98
All others	3.78

Source: 88 FR 69134, October 5, 2023.

Note: For further information on programs determined to be countervailable, see Commerce’s associated Issues and Decision Memorandum.

**Sales at LTFV**

On October 5, 2023, Commerce published notices in the Federal Register of its final determinations of sales at LTFV with respect to imports from China,<sup>10</sup> India,<sup>11</sup> and Vietnam.<sup>12</sup> Tables I-3, I-4, and I-5 present Commerce’s dumping margins with respect to imports of product from China, India, and Vietnam, respectively.

**Table I-3****Paper file folders: Commerce’s final weighted-average LTFV margins with respect to imports from China**

Exporter/producer	Final dumping margin (percent)
China-wide entity	192.70

Source: 88 FR 69141, October 5, 2023

**Table I-4****Paper file folders: Commerce’s final weighted-average LTFV margins with respect to imports from India**

Producer/exporter	Final dumping margin (percent)
Navneet Education Limited	17.22
Kokuyo Riddhi Paper Products Pvt. Ltd	86.01
LGPL Paper Industries Pvt. Limited	86.01
All others	17.22

Source: 88 FR 69138, October 5, 2023.

<sup>10</sup> 88 FR 69141, October 5, 2023.

<sup>11</sup> 88 FR 69138, October 5, 2023.

<sup>12</sup> 88 FR 69130, October 5, 2023.

**Table I-5**

**Paper file folders: Commerce’s final weighted-average LTFV margins with respect to imports from Vietnam**

<b>Producer/exporter</b>	<b>Final dumping margin (percent)</b>
Three-Color Stone Stationary (Viet Nam) Company Limited	97.52
All others	233.93

Source: 88 FR 69130, October 5, 2023.

## **The subject merchandise**

### **Commerce’s scope**

In the current proceeding, Commerce has defined the scope as follows:<sup>13</sup>

*The products within the scope of the investigation are file folders consisting primarily of paper, paperboard, pressboard, or other cellulose material, whether coated or uncoated, that has been folded (or creased in preparation to be folded), glued, taped, bound, or otherwise assembled to be suitable for holding documents. The scope includes all such folders, regardless of color, whether or not expanding, whether or not laminated, and with or without tabs, fasteners, closures, hooks, rods, hangers, pockets, gussets, or internal dividers. The term “primarily” as used in the first sentence of this scope means 50 percent or more of the total product weight, exclusive of the weight of fasteners, closures, hooks, rods, hangers, removable tabs, and similar accessories, and exclusive of the weight of packaging.*

*Subject folders have the following dimensions in their folded and closed position: lengths and widths of at least 8 inches and no greater than 17 inches, regardless of depth.*

*The scope covers all varieties of folders, including but not limited to manila folders, hanging folders, fastener folders, classification folders, expanding folders, pockets, jackets, and wallets.*

*Excluded from the scope are:*

- *mailing envelopes with a flap bearing one or more adhesive strips that can be used permanently to seal the entire length of a side such that, when sealed, the folder is closed on all four sides;*

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<sup>13</sup> 88 FR 69141, 88 FR 69138, and 88 FR 69130, October 5, 2023.

- *binders, with two or more rings to hold documents in place, made from paperboard or pressboard encased entirely in plastic;*
- *binders consisting of a front cover, back cover, and spine, with or without a flap; to be excluded, a mechanism with two or more metal rings must be included on or adjacent to the interior spine;*
- *non-expanding folders with a depth exceeding 2.5 inches and that are closed or closeable on the top, bottom, and all four sides ( e.g., boxes or cartons);*
- *expanding folders that have (1) 13 or more pockets, (2) a flap covering the top, (3) a latching mechanism made of plastic and/or metal to close the flap, and (4) an affixed plastic or metal carry handle;*
- *folders that have an outer surface (other than the gusset, handles, and/or closing mechanisms, if any) that is covered entirely with fabric, leather, and/or faux leather;*
- *fashion folders, which are defined as folders with all of the following characteristics: (1) plastic lamination covering the entire exterior of the folder, (2) printing, foil stamping, embossing ( i.e., raised relief patterns that are recessed on the opposite side), and/or debossing ( i.e., recessed relief patterns that are raised on the opposite side), covering the entire exterior surface area of the folder, (3) at least two visible and printed or foil stamped colors (other than the color of the base paper), each of which separately covers no less than 10 percent of the entire exterior surface area, and (4) patterns, pictures, designs, or artwork covering no less than thirty percent of the exterior surface area of the folder;*
- *portfolios, which are folders having (1) a width of at least 16 inches when open flat, (2) no tabs or dividers, and (3) one or more pockets that are suitable for holding letter size documents and that cover at least 15 percent of the surface area of the relevant interior side or sides; and*
- *report covers, which are folders having (1) no tabs, dividers, or pockets, and (2) one or more fasteners or clips, each of which is permanently affixed to the center fold, to hold papers securely in place.*

## Tariff treatment

Harmonized Tariff Schedule of the United States (“HTS”) subheading 4820.30.00 covers binders (other than book covers), folders, and file covers of paper or paperboard. Paper file folders, specifically, are currently imported under HTS statistical reporting number 4820.30.0040.<sup>14</sup> The general rate of duty is “free” for HTS statistical reporting number 4820.30.0040.<sup>15</sup> Products described in HTS subheading 4820.30, including statistical reporting number 4820.30.0040, that originate in China are subject to an additional 25 percent ad valorem duty under Section 301 of the Trade Act of 1974.<sup>16</sup> Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

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<sup>14</sup> This tariff classification includes products that are outside the scope of these investigations.

<sup>15</sup> See HTS (2023) Revision 10, Publication 5451, July 2023, p. 48-24.

<sup>16</sup> The U.S. Trade Representative imposed the tariffs under Section 301 of the Trade Act of 1974 after determining that certain acts, policies, and practices of China are unreasonable or discriminatory and burden or restrict U.S. commerce. 82 FR 40213, August 24, 2017 and 83 FR 14906, April 6, 2018). The products included in the third enumeration (“Tranche 3”) of goods produced in China are subject to additional Section 301 duties. Tranche 3 tariffs with a duty rate of 10 percent were put in place September 24, 2018 (83 FR 47974, September 21, 2018). On May 10, 2019, tranche 3 tariffs were increased to 25 percent ad valorem (84 FR 20459, May 9, 2019). If a Tranche 3 good was exported from China to the United States prior to May 10, 2019, and entered the United States prior to June 1, 2019, it was not subject to the escalated 25 percent duty (84 FR 21892, May 15, 2019). See HTS heading 9903.88.03 and U.S. notes 20 (e) and (f) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2022) Revision 11, Publication 5382, October 2022, pp. 99-III-26, 99-III-27, 99-III-40.

## The product<sup>17</sup>

### Description and applications

File folders are a folded (or creased in preparation to be folded) product used mainly to hold documents or other records together for professional office or home office organization.<sup>18</sup> Paper file folders are primarily<sup>19</sup> made of paper, paperboard, pressboard, or other cellulose material.<sup>20</sup>

Paper file folders can be glued, taped, bound, or otherwise assembled. They can also be coated or uncoated; laminated or not; expanding or not; or use fasteners, closures, hooks, rods, hangers, pockets, gussets, or internal dividers. They are folded to be opened on a least one side to allow for the insertion and removal of documents and other materials. They generally feature plain designs and colors.<sup>21</sup>

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<sup>17</sup> Unless otherwise noted, the information in this section is based on Petition, Vol. I, pp. 7-9, Response of Petitioner to Second Volume I Supplemental Questions, Exhibit I-2S1, p. 1-2, Petitioners' postconference brief, Exhibit 1, pp. 20-22. The universe of paper file folders is extensive, and the discussion provided is not exhaustive.

<sup>18</sup> Merriam-Webster.com Dictionary, (n.d.), "Folder," <https://www.merriam-webster.com/dictionary/folder>, accessed November 5, 2022.

<sup>19</sup> According to the Response of Petitioner to Second Volume I Supplemental Questions and Petitioner postconference brief, a paper file folder is paper based for at least 50 percent of the total product weight, exclusive of the weight of fasteners, closures, hooks, rods, hangers, removable tabs, and similar accessories and exclusive of the weight of packaging. For example, there are also file folders made mostly of plastic materials like polypropylene, which, because they are not primarily made from paper, are not paper file folders and are outside of the scope of these investigations.

<sup>20</sup> Cellulose is a naturally occurring plant material. Cellulose. Merriam-Webster.com Dictionary, (n.d.), <https://www.merriam-webster.com/dictionary/cellulose>, accessed November 5, 2022.

<sup>21</sup> According to the Response of Petitioner to Second Volume I Supplemental Questions, some folders, not commonly referred to as paper file folders, are known as "fashion folders," and are outside of the Scope. Fashion folders typically feature (1) plastic lamination covering the entire exterior of the folder, (2) printing, foil stamping, embossing (i.e., raised relief patterns that are recessed on the opposite side), and/or debossing (i.e., recessed relief patterns that are raised on the opposite side), (3) at least two visible and distinct printed or foil stamped colors other than the color of the base paper, and other than the printing of numbers, letters, words, or logos, each of which separately covers no less than 10 percent of the entire exterior surface area, and (4) elaborate designs and colors (such as patterns, pictures, designs, or artwork) covering no less than thirty percent of the exterior surface area of the folder.



These products are usually designed to hold documents of the two primary paper sizes in North America: (1) letter size and (2) legal size.<sup>22</sup> As such, these paper file folders, in their folded and closed position, have the following dimensions: lengths and widths of at least 8 inches and no greater than 17 inches, regardless of depth.

Paper file folders commonly feature some type of tab or label that allows one to identify the type of information contained within. These tabs can vary in placement and measurement but are usually top tabs or end tabs. The top tabs come in varied positions for ease of review when stored in a cabinet. End tabs are for vertical storage. The most common tab size is 1/3 (but can go to 1/12) of the folder's width, placed to the right, center, or left. Tabs are available reinforced or plain (not reinforced). Reinforced tabs are typically doubled in thickness for added durability. Users commonly write on the tab or use adhesive labels to categorize the paper file folder contents.

The type of paper file folder being used varies based on the filing system used in a specific office setting. Many users organize their filing systems based on the thickness of the document being filed.<sup>23</sup> There are many types of paper file folders, including but not limited to manila folders, hanging folders, fastener folders, classification folders, expanding folders, pockets, jackets, and wallets.

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<sup>22</sup> The term "letter size" commonly refers to paper that is 8-½ inches wide and 11 inches long (216 mm x 279 mm). The term "legal size" commonly refers to paper that is 8-½ inches wide and 14 inches long (216 mm x 356 mm). Paper Sizes 2022, (n.d.) "US Paper Sizes," <https://www.papersizes.org/us-paper-sizes.htm>, accessed November 5, 2022.

<sup>23</sup> Petitioner, Postconference Brief, November 7, 2022, p. 6 and conference transcript, p. 41 (Beckman).

## Manila folders

Manila folders get their name from the fiber originally used, manila hemp or abaca primarily grown in the Philippines (figure I-1).<sup>24</sup> These paper file folders are no longer banana-based, they are commonly made instead from wood pulp fiber inputs. Manila folders are typically made with 11 point (pt.)<sup>25</sup> paper (card stock<sup>26</sup>) and available in buff or beige.

**Figure I-1**  
**Paper file folders: Manila folder**



Source: TOPS™ Products. "Pendaflex® File Folders, Legal Size, Manila, 1/3 Cut, Center Position, 100/BX," <https://www.tops-products.com/pendaflexr-file-folders-legal-size-manila-1-3-cut-center-position-100-bx.html>, accessed November 5, 2022.

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<sup>24</sup> Lui, Claire, April 2, 2021, "A Manila Envelope: The Inspiration behind an Exhibition's Graphic Identity," <https://www.guggenheim.org/blogs/checklist/a-manila-envelope-the-inspiration-behind-an-exhibitions-graphic-identity>.

<sup>25</sup> Point (pt.) is a common paper and packaging measure of thickness. The thickness of the product is measured with each point representing 1/1000<sup>th</sup> of an inch. An 11-pt. paper is 11/1000ths of an inch in thickness. The thickness increases as the point value increases. GSM, grams per square meter, is another measure, using meters rather than inches. The thickness and weight increase as the GSM value increases. Point and GSM measurements cannot be converted, as GSM measures additional information (it measures weight and thickness). Iverson, Jana, September 23, 2021, "GSM vs PT Unit System: What is the Difference?," <https://pakfactory.com/blog/gsm-vs-pt-unit-system/>.

<sup>26</sup> Card stock is a general term for heavy weight paper. It is thicker than writing paper, but thinner than paperboard. The Paper, (February 17, 2017), Paper 101, Paper Facts, "The Ultimate Guide to Card Stock: Part 1," <https://blog.thepapermillstore.com/ultimate-guide-to-card-stock/part-1-what-is-card-stock/>.

## Hanging folders

Hanging folders are named as such because they hang from the rails found in some file cabinets, desktop hanging file frames, and other file storage options (figure I-2). These paper file folders include metal rods for hanging. Hanging folders are typically made with 11 pt. thick paper (card stock) and are available in a variety of colors (as an additional categorization feature to allow for color coding).

**Figure I-2**  
**Paper file folders: Hanging folders**



Source: Smead Manufacturing Company, Inc., “FasTab® Hanging File Folders, 1/3-Cut Built-In Tab,” <https://www.smead.com/products/fastab-hanging-file-folders-1-3-cut-built-in-tab?variant=42101669527723>, accessed November 5, 2022.

## Fastener folders

Fastener folders are paper file folders that are intended to hold documents in place using flat prongs (figure I-3). Two metal fasteners are typically embossed or bonded (glued) and positioned at the end on the folder interior. Embossed prongs are threaded through the folder and are kept in place using smaller prongs. Bonded prongs are glued with an adhesive to the folder surface. The documents would be hole-punched to thread the prongs to hold them in place. These prongs are typically 2 to 2.75 inches wide, with a 1-inch to 2-inch capacity for holding documents. These paper file folders are generally made with 11 pt. thick paper (card stock). They are available in a variety of colors and card stocks (figure I-3 shows two options, including manila and kraft paper).<sup>27</sup>

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<sup>27</sup> Kraft paper is made with a particular wood pulp manufacturing process to ensure durability. PaperIndex Academy, (n.d.), “Kraft Paper Primer,” <https://www.paperindex.com/academy/paper-grades/kraft-paper-primer>, accessed November 7, 2022.

**Figure I-3**  
**Paper file folders: Fastener folders**



Source: TOPS™ Products.(left) “Pendaflex® Manila Fastener Folders, Legal Size, 2 Fasteners, Straight Cut, 50/BX,” <https://www.tops-products.com/fastener-folder-2-fasteners-straight-manila-legal.html> and (right) “Pendaflex® Kraft Fastener Folders, Legal Size, 2 Fasteners, 1/3 Cut, 50/BX,” <https://www.tops-products.com/pendaflexr-kraft-fastener-folders-legal-size-kraft.html>, accessed November 7, 2022.

### **Classification folders**

Classification folders are paper file folders that are intended to hold many documents related to a single topic (figure I-4). These paper file folders have dividers built in to allow organizing and sorting. They are generally made with 25 pt. thick paper (pressboard stock). They offer a range of dividers, with the most common between 1 and 4 dividers. Most feature a tear resistant gusset to allow expansion (range of this expansion is typically from 1- 5-inches). Metal prongs are inserted for each section to keep documents secure (see fastener folders, above). Classification folders come in a wide range of colors, to allow for color coding.

**Figure I-4**  
**Paper file folders: Classification folder**



Source: Smead Manufacturing Company, Inc., “Pressboard Classification Folders, 2 Dividers, 2 inch Expansion, 2/5-Cut Tab,” [https://www.smead.com/products/pressboard-classification-folders-2-dividers-2-inch-expansion-2-5-cut-tab?\\_pos=3&\\_psq=pressboard+classification&\\_ss=e&\\_v=1.0](https://www.smead.com/products/pressboard-classification-folders-2-dividers-2-inch-expansion-2-5-cut-tab?_pos=3&_psq=pressboard+classification&_ss=e&_v=1.0), accessed November 5, 2022.

## Expanding folders

Expanding folders are expandable paper file folders which are closed on three sides. The expansion adjusts in size based upon the contents and capacity, as they feature an accordion-like structure (figure I-5).<sup>28</sup> They are available in a variety of colors. Regardless of their external color, their construction is typically of 11 pt. card stock and reinforced with manila-lined fronts, backs, and gussets. These paper file folders are intended to hold bulk documents together and generally have a scored design so that the tops of the front and back fold down for access.

**Figure I-5**  
**Paper file folders: Expanding folder**



Source: Office Depot, "Smead® Expanding File Pockets, 5 1/4" Expansion, 9 1/2" x 14 3/4", 30% Recycled, Redrope, Pack of 10," [https://www.officedepot.com/a/products/808584/Smead-Expanding-File-Pockets-5-14/?utm\\_source=google&utm\\_medium=cpc&mediacampaignid=71700000094453789\\_17280504614&gclid=CjwKCAiA9qKbBhAzEiwAS4yeDZ\\_EO1ioDKnNU\\_PmKnL8zZXfSM4aGCpfjFzx2FlgD-gBk5CFFyGdMxoCyllQAvD\\_BwE&gclidsrc=aw.ds](https://www.officedepot.com/a/products/808584/Smead-Expanding-File-Pockets-5-14/?utm_source=google&utm_medium=cpc&mediacampaignid=71700000094453789_17280504614&gclid=CjwKCAiA9qKbBhAzEiwAS4yeDZ_EO1ioDKnNU_PmKnL8zZXfSM4aGCpfjFzx2FlgD-gBk5CFFyGdMxoCyllQAvD_BwE&gclidsrc=aw.ds), accessed November 7, 2022.

## Pocket folders

Pocket folders are paper file folders that are open on three sides and have one or two pockets on the inside (figure 1-6). They are intended to store small or loose items. They are typically made with 11 pt. thick paper (card stock) and are available in a variety of colors.

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<sup>28</sup> According to the Response of Petitioner to Second Volume I Supplemental Questions, expanding folders that feature products that are not paper (such as those covered entirely with fabric, leather, or faux leather) on an outer surface (other than the gusset, handles, and/or closing mechanisms), are also not considered paper file folders and are outside of the scope of these investigations.

**Figure I-6**  
**Paper file folders: Pocket folder**



Source: Smead Manufacturing Company, Inc., “End Tab Pocket Folders with Reinforced Tab,” [https://www.smead.com/products/end-tab-pocket-folders-with-reinforced-tab?\\_pos=1&\\_psq=end-tab+packet-folders-with-reinforced+tab&\\_ss=e&\\_v=1.0](https://www.smead.com/products/end-tab-pocket-folders-with-reinforced-tab?_pos=1&_psq=end-tab+packet-folders-with-reinforced+tab&_ss=e&_v=1.0), accessed November 7, 2022.

### **File jackets**

File jackets are paper file folders that are closed on three sides with a straight-cut, reinforced tab (figure I-7). They are generally made with 11 pt. card stock and are available in a variety of colors. They are designed to slide into hanging folders to keep documents together, but can be used outside of this application, based on user preference. These paper file folders are available in a flat shape or with expansion capability to increase filing capacity.<sup>29, 30</sup>

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<sup>29</sup> In contrast to file jackets, report covers, which are excluded from the scope of these investigations, are folders having (1) no tabs, dividers, or pockets, and (2) one or more fasteners or clips, each of which is permanently affixed to the center fold, to hold papers security in place.

<sup>30</sup> In contrast to file jackets, portfolios, which are excluded from the scope of these investigations, are folders having (1) a width of at least 16 inches when open flat, (2) no tabs or dividers, and (3) one or more pockets that are suitable for holding letter size documents and that cover at least 15 percent of the surface area of the relevant interior side or sides.

**Figure I-7**  
**Paper file folders: File jacket**



Source: Smead Manufacturing Company, Inc., “Manila File Jackets, Flat-No Expansion, Straight-Cut Tab,” [https://www.smead.com/products/manila-file-jackets-flat-no-expansion-straight-cut-tab?\\_pos=1&\\_psq=manila+file+jacket&\\_ss=e&\\_v=1.0](https://www.smead.com/products/manila-file-jackets-flat-no-expansion-straight-cut-tab?_pos=1&_psq=manila+file+jacket&_ss=e&_v=1.0), accessed November 7, 2022.

### **File wallets**

File wallets are paper file folders that are intended to protect documents while carrying. They are closed on three sides, are usually expandable (with accordion-type structure) and offer a top protective flap to keep documents inside (figure I-8). File wallets are designed to permit top tab file folders to fit inside. They are generally made with 11 pt. card stock and some are lined with tear-resistant material for added durability. Most come with an elastic cord or other fastener to keep them securely closed.<sup>31</sup>

**Figure I-8**  
**Paper file folders: File wallet**



Source: Smead Manufacturing Company, Inc., “TUFF® Expanding Wallets, 5-1/4-Inch Expansion,” [https://www.smead.com/products/tuff-expanding-wallets-5-1-4-inch-expansion?\\_pos=4&\\_psq=tuff+expanding&\\_ss=e&\\_v=1.0](https://www.smead.com/products/tuff-expanding-wallets-5-1-4-inch-expansion?_pos=4&_psq=tuff+expanding&_ss=e&_v=1.0), accessed November 7, 2022.

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<sup>31</sup> Unlike file wallets, mailing envelopes have a flap bearing one or more adhesive strips that can be used permanently to seal the entire length of a side such that, when sealed, the folder is closed on all four sides. Mailing envelopes are excluded from the scope of these investigations.

## Manufacturing processes

The manufacturing process for paper file folder products usually includes four steps: (1) setting up the paper at the beginning of the line; (2) using a die cutting machine to size and score the paper; (3) any finishing required to achieve the proper functionality for the item at issue; and (4) preparing the item for shipment. Domestic production processes are believed to be similar to those of foreign production.<sup>32,33</sup>

Paper file folders are typically made using a wood pulp fiber-based material referred to as “Bristol paper,” which is commonly used in the manufacture of both these products and other select paper products.<sup>34</sup>

In the first step of the manufacturing process for some paper file folders (such as manila folder, pocket folder, and file jacket<sup>35</sup>), a roll of paper is set up at the beginning of the line. Second, the paper is run through a die cutting machine that die cuts the paper to the desired folder size and scores the resulting folders. Next, the folders are closed and passed through an automated packaging line where they are counted, stacked, and placed in a box bottom. The automated packaging line then places a box lid over the box bottom. The automated packaging line stacks the folder boxes and places them in a shipping carton. The shipping carton is taped closed and stacked on a pallet.

The process for manufacturing hanging folders is similar to the paper file folders above, in that the first step of the manufacturing process includes setting up a roll of paper at the beginning of the line. The roll of paper runs through the line with the inside of the folder facing up. Glue is applied near the top edges of the paper. Second, steel hanging rods are placed at both ends of the paper on top of the glue line (which helps hold them in place), and the paper is then scored at the top edges of both panels and die cut to create multiple tab positions in the panels. Third, the top edges are folded over the hanging folder rods and sealed with glue. The hanging folder is then scored and folded closed. Fourth, the hanging folders pass through an

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<sup>32</sup> “\*\*\* production process is similar to the production processes of the Chinese producers and is therefore representative for purposes of this petition.” Petition, Vol. II, p. 8.

<sup>33</sup> Petitioners note that the industry has not undergone any major manufacturing process innovation. Petitioners have invested in some improvements and manufacturing enhancements \*\*\*. Petitioner, Postconference brief, November 7, 2022, Exhibit 1, p. 18-19. Respondents also note that the industry has not had significant manufacturing process innovations in the last 10 years. However, respondents indicate that there have been some technological upgrades to improve production efficiency. Respondent, Postconference brief, November 7, 2022, Exhibit 6, p. 5-6.

<sup>34</sup> Petitioners’ postconference brief, p. 6. and White Birch Paper, (n.d.), “Bristol Paper,” <https://whitebirchpaper.com/products/bristol-paper/>, accessed November 8, 2022.

<sup>35</sup> The process for file wallet folders and classification folders has a similar process and may include additional steps for dividers, clasps, and elastic chords or other fasteners.



automated packaging line where they are counted, stacked, and placed in a box bottom. A bag of tabs and paper inserts are automatically fed into the box and placed on top of the folders. The automated packaging line then places a box lid over the box bottom. The automated packaging line stacks the hanging folder boxes and places them in a shipping carton. The shipping carton is taped closed and stacked on a pallet.

In the first step of the manufacturing process for fastener folders, a roll of paper is set up at the beginning of the line. Second, the paper is run through a die cutter, which die cuts and scores one folder at a time. Third, the paper is run through a gluer to apply a spot of glue at the top edge before the top edge is folded over to create the reinforced tab. The folder is then folded closed and stacked at the end of the line. The folders are then transferred to a fastener line. The folder is fed through a fastener machine which opens the folder, places two fasteners at the top of the folder covers and then folded closed. Finally, the folders are counted, stacked, and placed in a box bottom. A box lid is placed over the box bottom. Boxes of fastener folders are stacked and placed in a shipping carton. The shipping carton is taped closed and stacked on a pallet.

In the first step of the manufacturing process for expanding folders, rolls of paper are set up at the beginning of the line. Second, one roll of paper runs through a die cutter with cutting dies that cut, score, and round the corners of one front or back cover for subassembly purposes. A second roll of paper is run through a gusset machine to apply reinforcing tape on the edge of the paper followed by the folding and cutting of the gusset. A third roll of paper is run through a gluer that folds the top edge of the paper and applies a spot of glue before the top edge is folded over to create the reinforced tabs, which are then cut by dies to into expanding file indexes, and information is printed on the index tabs. Third, the covers, gusset, and indexes are assembled, and then the front and back covers are glued to chipboards.<sup>36</sup> The expanding file folder then is compressed, shrink- wrapped, counted, and placed in a shipping carton. The shipping carton is taped closed and stacked on a pallet.

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<sup>36</sup> Chip board is also referred to as particle board or low-density fiberboard. It is made by mixing wood particles with resin. This mixture is pressed with heat to produce a board.

For each paper file folder product, packaging for shipment includes marking the product brand.<sup>37</sup> Brands that are owned and marketed by producers are called “manufacturer brand” or “branded.” Brands that are owned and marketed by sellers are called “private label.” At that stage, the product box is labeled according to the product brand.

## **Domestic like product issues**

The petitioners contend that there is a single like product consisting of all domestically produced paper file folders, coextensive with the scope of these investigations.<sup>38</sup> Respondent parties did not submit prehearing or posthearing briefs and thus did not comment on the definition of the domestic like production in the final phase of these investigations.<sup>39</sup> In its preliminary determinations, the Commission defined the domestic like product as a single domestic like product consisting of all domestically produced paper file folders, coextensive with the scope of these investigations.<sup>40</sup> No parties requested data or other information necessary for the analysis of the domestic like product.

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<sup>37</sup> \*\*\*. Petitioners’ postconference brief, exhibit 1 and pp. 22.

<sup>38</sup> Petitioners’ prehearing brief, p 10.

<sup>39</sup> In the preliminary phase of these investigations, respondents Staples, Navneet Education Limited, Three-Color Stone Stationery Company Limited, and Thrasio LLC did not challenge the petitioners’ position, while respondent Target did not comment on the issue.

<sup>40</sup> Paper File Folders from China, India, and Vietnam, Inv. Nos. 701-TA-683 and 731-TA-1594-1596 (Preliminary), USITC Publication 5389, December 2022., p. 17.

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

### U.S. market characteristics

Paper file folders are generally used to organize U.S. letter and legal-sized documents in home and office settings. As a consumer product, it is sold primarily through the retail channel, followed by the distribution channel. Retailers comprised the majority of responding importers in these investigations; these firms are also large purchasers of domestically produced paper file folders. U.S. producers sell both branded and private label file folders to the major retailers. \*\*\*.

The majority of firms (two of three U.S. producers, all eight responding importers, and five of six responding purchasers) indicated that the market for paper file folders was not subject to distinctive conditions of competition, while one U.S. producer, no importers and one purchaser reported that it is. U.S. producer \*\*\* reported that the paper file folders market “peaks slightly” from December through March as businesses re-establish their filing systems and during the tax filing period, while U.S. producer \*\*\* reported that the fourth quarter is generally heavier than other quarters.<sup>1</sup>

Apparent U.S. consumption of paper file folders, by quantity, decreased over the period for which data were collected. Overall, apparent U.S. consumption increased by \*\*\* percent between 2020 and 2022, but was \*\*\* percent lower in January – June 2023 compared to January – June 2022. U.S. producers’ share of apparent consumption quantity decreased by \*\*\* percentage points between 2020 and 2022.

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<sup>1</sup> Purchaser \*\*\* identified domestic pricing versus imports as a distinct condition of competition.

## U.S. purchasers

The Commission received seven usable questionnaire responses from firms that had purchased paper file folders during January 2020 – June 2023.<sup>2 3 4</sup> Five responding purchasers are retailers, three are distributors, and one purchaser, \*\*\*, identified as a cooperative. In general, responding U.S. purchasers are located across the United States. The responding purchasers were generally large retailers. Large purchasers of paper file folders include \*\*\*.

## Impact of section 301 tariffs and 232 tariffs

U.S. producers, importers, and purchasers were asked to report the impact of section 301 tariffs on overall demand, supply, prices, or raw material costs. Two of three U.S. producers, five of eight responding importers, and two of seven responding purchasers reported that section 301 tariffs had an impact in the paper file folders market, while one U.S. producer and importer each \*\*\* and 3 purchasers \*\*\* reported that they did not know. U.S. importers reported that section 301 tariffs increased costs; \*\*\* reporting that the tariffs increased costs by 25 percent and that the market did not support this increase, resulting in its need to search for alternative sources within 12 months. Similarly, importer/purchaser \*\*\* reported that most importers initially absorbed the additional costs but that as other inflationary factors came into play, most importers/resellers of paper file folders began increasing their prices to help offset the tariff increases.

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<sup>2</sup> The following firms provided purchaser questionnaire responses: \*\*\*.

<sup>3</sup> Of the seven responding purchasers, five purchased the domestic paper file folders, five purchased subject imports of paper file folders from China, two purchased from India, five purchased from Vietnam, and two purchased nonsubject paper file folders from Mexico. Two purchasers purchased imports of paper file folders from other sources. Purchaser \*\*\* identified the other nonsubject sources as \*\*\*.

<sup>4</sup> Seven purchasers indicated they had marketing/pricing knowledge of the domestic product, five of Chinese product, four of Indian product, three of Vietnamese product, four of Mexican product, and three of product from other nonsubject countries.

## Channels of distribution

U.S. producers and importers mainly sold to retailers, and mostly under private label, as shown in table II-1. The share of U.S. producers' shipments of private label paper file folders to retailers decreased from 2020 to 2022. The share of private label paper file folders produced in China and sold to retailers represented an \*\*\* majority of U.S. shipments between 2020-22, but this share peaked in 2022 and \*\*\*. U.S. importers of paper file folders from India sold \*\*\*. The share of importers' U.S. shipments of private label paper file folders produced in Vietnam sold to retailers \*\*\* through June 2023.

**Table II-1**

**Paper file folders: Share of U.S. shipments by source, channel of distribution, and period**

Shares in percent

Source	Channel	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
United States	Retailers: Branded	***	***	***	***	***
United States	Retailers: Private label	***	***	***	***	***
United States	Distributors	***	***	***	***	***
United States	End users	***	***	***	***	***
China	Retailers: Branded	***	***	***	***	***
China	Retailers: Private label	***	***	***	***	***
China	Distributors	***	***	***	***	***
China	End users	***	***	***	***	***
India	Retailers: Branded	***	***	***	***	***
India	Retailers: Private label	***	***	***	***	***
India	Distributors	***	***	***	***	***
India	End users	***	***	***	***	***
Vietnam	Retailers: Branded	***	***	***	***	***
Vietnam	Retailers: Private label	***	***	***	***	***
Vietnam	Distributors	***	***	***	***	***
Vietnam	End users	***	***	***	***	***
Subject sources	Retailers: Branded	***	***	***	***	***
Subject sources	Retailers: Private label	***	***	***	***	***
Subject sources	Distributors	***	***	***	***	***
Subject sources	End users	***	***	***	***	***
Mexico	Retailers: Branded	***	***	***	***	***
Mexico	Retailers: Private label	***	***	***	***	***
Mexico	Distributors	***	***	***	***	***
Mexico	End users	***	***	***	***	***
All other sources	Retailers: Branded	***	***	***	***	***
All other sources	Retailers: Private label	***	***	***	***	***
All other sources	Distributors	***	***	***	***	***
All other sources	End users	***	***	***	***	***
Nonsubject sources	Retailers: Branded	***	***	***	***	***
Nonsubject sources	Retailers: Private label	***	***	***	***	***
Nonsubject sources	Distributors	***	***	***	***	***
Nonsubject sources	End users	***	***	***	***	***
All imports	Retailers: Branded	***	***	***	***	***
All imports	Retailers: Private label	***	***	***	***	***
All imports	Distributors	***	***	***	***	***
All imports	End users	***	***	***	***	***

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

## Geographic distribution

U.S. producers and importers reported selling paper file folders to all regions in the contiguous United States (table II-2). For U.S. producers, \*\*\* percent of sales were within 100 miles of their production facility, \*\*\* percent were between 101 and 1,000 miles, and \*\*\* percent were over 1,000 miles. For U.S. importers, \*\*\* percent of sales were within 100 miles of their production facility, \*\*\* percent were between 101 and 1,000 miles, and \*\*\* percent were over 1,000 miles.

**Table II-2**  
**Paper file folders: Count of U.S. producers' and U.S. importers' geographic markets**

Count in number of firms reporting

Region	U.S. producers	China	India	Vietnam	Subject sources
Northeast	3	5	1	4	5
Midwest	3	5	1	4	5
Southeast	3	5	1	4	5
Central Southwest	3	5	1	4	5
Mountain	3	5	1	4	5
Pacific Coast	3	5	1	4	5
Other	3	4	1	4	4
All regions (except Other)	3	5	1	4	5
Reporting firms	3	5	1	4	5

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 paper file folders from U.S. producers and from subject countries. Generally, subject country capacity utilization was high, inventories were low for India, and nearly all shipments of paper file folders from all sources went to the U.S. market.

**Table II-3**  
**Paper file folders: Supply factors that affect the ability to increase shipments to the U.S. market, by country**

Quantity in 1,000 folders; ratio and share in percent, count in number of firms reporting

Factor	Measure	United States	China	India	Vietnam	Subject sources
Capacity 2020	Quantity	***	***	***	***	***
Capacity 2022	Quantity	***	***	***	***	***
Capacity utilization 2020	Ratio	***	***	***	***	***
Capacity utilization 2022	Ratio	***	***	***	***	***
Inventories to total shipments 2020	Ratio	***	***	***	***	***
Inventories to total shipments 2022	Ratio	***	***	***	***	***
Home market shipments 2022	Share	***	***	***	***	***
Non-US export market shipments 2022	Share	***	***	***	***	***
Ability to shift production (firms reporting "yes")	Count	***	***	***	***	***

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

Note: Responding U.S. producers accounted for more than 75 percent of U.S. production of paper file folders in 2022. No responses to the Commission questionnaire were received from foreign producers/exporter firms of U.S. imports of paper file folders from China. Responding foreign producer/exporter firms accounted for more than 75 percent of U.S. imports of paper file folders from India and less than 25 percent of U.S. imports of paper file folders from Vietnam during 2022. 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 Parts III and IV.



## **Domestic production**

Based on available information, U.S. producers of paper file folders have the ability to respond to changes in demand with at least moderate-to-large changes in the quantity of shipments of U.S.-produced paper file folders to the U.S. market. The main contributing factor to this degree of responsiveness of supply is the availability of unused capacity and some inventories. Factors mitigating responsiveness of supply include a limited ability to shift production to or from alternate products or shift shipments from other markets.

U.S. producers' capacity \*\*\* by \*\*\* percent, while production \*\*\* by \*\*\* percent, leading to an overall \*\*\* in capacity utilization during 2020-22. U.S. producers held inventories during the period, though those ultimately declined from 2020-22. U.S. producers export \*\*\* and \*\*\* U.S. producers reportedly cannot domestically produce other products on the same equipment as paper file folders. Other products that producers reportedly can produce on the same equipment as paper file folders are small pockets (reported by \*\*\*). Factors affecting U.S. producers' ability to shift production include specialized die cutting equipment and setup costs to switch production.

## **Subject imports from China**

No producers from China responded to the foreign producers' questionnaire. Based on limited available information, producers of paper file folders from China have the ability to respond to changes in demand with small-to-moderate changes in the quantity of shipments of paper file folders to the U.S. market. Imports of paper file folders from China decreased \*\*\* between 2020 and 2022.<sup>5</sup>

## **Subject imports from India**

Based on available information, the sole producer of paper file folders from India, Navneet, has the ability to respond to changes in demand with \*\*\* changes in the quantity of shipments of paper file folders to the U.S. market. The main contributing factor to this degree of responsiveness of supply is the ability to \*\*\*. Factors mitigating responsiveness of supply include \*\*\*. Navneet reported that it \*\*\* to shift production to or from alternate products.

Navneet's capacity \*\*\* during 2020-22, but the \*\*\* outpaced the \*\*\* , resulting in a capacity utilization increase of \*\*\*

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<sup>5</sup> For more information on subject imports from China, please refer to table IV-2.

percentage points. Navneet reported \*\*\* shipments of paper file folders to its home or third-country markets, and identified those markets as \*\*\*. Other products that it reportedly can produce on the same equipment as paper file folders are \*\*\*. Factors affecting Navneet's ability to shift production include \*\*\*.

### **Subject imports from Vietnam**

Based on available information, producers of paper file folders from Vietnam have the ability to respond to changes in demand with \*\*\* changes in the quantity of shipments of paper file folders to the U.S. market. The main contributing factors to this degree of responsiveness of supply are \*\*\*.

The one responding Vietnamese producer, TCS, increased its capacity more than \*\*\* between 2020 and 2022, however production increased \*\*\*, and capacity utilization fell by \*\*\* percentage points. TCS also identified \*\*\* as its export markets other than the United States. Other products that TCS reportedly can produce on the same equipment as paper file folders are \*\*\*. Factors affecting this foreign producer's ability to shift production include \*\*\*.

### **Imports from nonsubject sources**

Nonsubject imports accounted for \*\*\* percent of total U.S. imports in 2020-21 and \*\*\* percent in 2022. The largest source of imports was Mexico, which accounted for \*\*\* percent of nonsubject imports in 2020-21 and \*\*\* percent of nonsubject imports in 2022.

### **Supply constraints**

Two U.S. producers and one importer reported that they had experienced supply constraints between January 1, 2020 and October 12, 2022, when the petition was filed. Three purchasers reported supply constraints for domestically produced paper file folders, one reported supply constraints for paper file folders produced in subject countries, and two

reported supply constraints for nonsubject paper file folders. No firms reported supply constraints since the filing of the petition. U.S. producer \*\*\* reported that it had an ongoing problem of meeting timely shipment commitments. U.S. producer \*\*\* reported that it had temporary supply chain challenges due to the COVID-19 pandemic. Similarly, \*\*\* reported experiencing periods during which inventory was out of stock during the ordinary course of business as the result of the COVID-19 pandemic.

### **New suppliers**

No purchasers indicated that new suppliers entered the U.S. market since January 1, 2020.

### **U.S. demand**

Based on available information, the overall demand for paper file folders is likely to experience small changes in response to changes in price. The main contributing factor is limited economically-viable substitute products.

### **Business cycles**

Two of three U.S. producers, three of seven responding importers, and three of six purchasers indicated that the market was subject to business cycles. Specifically, firms cited the beginning of the calendar year, tax season, and back-to-school/business as part of business cycles for the paper file folders market. U.S. producer \*\*\* reported that the fourth quarter is generally heavier than other quarters. According to an industry report, uncoated free sheet suppliers were expecting better demand because of back-to-school in July-September 2023, but the demand was below expectations.<sup>6</sup>

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<sup>6</sup> Mercante, Renata, Fastmarkets, "Printing and Writing Paper Destocking in North America Continues to Put Prices Under Downward Pressure", retrieved October 10, 2023.

## Demand trends

Most importers and purchasers reported that U.S. demand for paper file folders fluctuated down or steadily decreased since January 1, 2020 (table II-4). Importer/purchaser \*\*\* reported that there has been an overall decrease in demand for office folders that began before 2019 since customers decreased the amount of printing. It also added that its own internal use of paper file folders decreased due to remote work that began during COVID-19. U.S. producer \*\*\* added that sales have not returned to pre-COVID-19 levels since remote/hybrid office models continue to be the preferred work model.

**Table II-4**  
**Paper file folders: Count of firms' responses regarding overall domestic and foreign demand, by firm type**

Count in number of firms reporting

Market	Firm type	Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decrease
Domestic demand	U.S. producers	0	0	0	1	2
Domestic demand	Importers	1	0	1	4	2
Domestic demand	Purchasers	0	0	1	3	2
Foreign demand	U.S. producers	0	0	1	0	0
Foreign demand	Importers	0	0	1	0	0
Foreign demand	Purchasers	0	0	1	1	0

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

## Substitute products

One of three U.S. producers, five of seven responding importers, and four of six responding purchasers reported that there are substitutes. Two U.S. producers, four importers, and four purchasers reported that polypropylene file folders are substitutes and that they are used for the same end uses as paper file folders. However, U.S. producers \*\*\* and importer/purchaser \*\*\* reported that polypropylene folders are more expensive than paper file folders, with \*\*\* adding that they are generally perceived as a direct substitute but that the price sensitivity is not as pronounced as it is between private brand and manufacturer branded paper filing products.

## **Substitutability issues**

This section assesses the degree to which U.S.-produced paper file folders and imports of paper file folders from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of paper file folders from domestic and imported sources based on those factors. Based on available data, staff believes that there is a high degree of substitutability between domestically produced paper file folders and paper file folders imported from subject sources.<sup>7</sup> Factors contributing to this level of substitutability include high comparability across most purchase factors, little customer preference for a particular country of origin, interchangeability between domestic and subject sources, and limited significant factors other than price.

### **Factors affecting purchasing decisions**

#### **Purchaser decisions based on source**

As shown in table II-5, most purchasers and their customers either sometimes or usually make purchasing decisions based on the producer, with no purchasers reporting that they or their customers always make decisions based the manufacturer. \*\*\* reported that its preference is not to source from countries with significant trade, political or social risk, and may consider duty rates and supply chain options, while \*\*\* cited uniqueness of offerings and quality and continuing vendor relationships with known partners that produce reliably and \*\*\* cited quality, price, and strategic relationships as reasons for which they make purchasing decisions based on the producer.

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<sup>7</sup> The degree of substitution between domestic and imported paper file folders depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced paper file folders to paper file folders imported from subject countries (or vice versa) when prices change. The degree of substitution may include such factors as relative prices (discounts/rebates), quality differences (e.g., grade standards, defect rates, etc.), and differences in sales conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

**Table II-5**  
**Paper file folders: Count of U.S. purchasers' responses regarding frequency of purchasing decisions based on producer and country of origin**

Count in number of firms reporting

Firm making decision	Decision based on	Always	Usually	Sometimes	Never
Purchaser	Producer	1	3	2	0
Customer	Producer	0	0	1	2
Purchaser	Country	0	1	4	1
Customer	Country	0	0	1	2

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

### Importance of purchasing domestic product

Four of five responding purchasers reported that most or all of their purchases did not require purchasing U.S.-produced product. One reported that domestic product was required by law (for \*\*\* of its purchases), none reported it was required by their customers. One firm \*\*\* reported other preferences for domestic product, though this firm did not elaborate on its reasons for preferring domestic product.

### Most important purchase factors

The most often cited first-most important factor firms consider in their purchasing decisions for paper file folders was quality (3 firms), as shown in table II-6. Price/cost and quality were the most frequently cited second-most important factors (cited by 3 firms each), and price/cost, availability, and other factors were the most frequently reported third-most important factors (cited by 2 firms each).

**Table II-6**  
**Paper file folders: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor**

Count in number of firms reporting

Factor	First	Second	Third	Total
Price / Cost	1	3	2	6
Quality	3	3	0	6
Availability / Supply	1	0	2	3
All other factors	1	0	2	NA

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

Note: Other factors include marketing support and reliability and familiarity with purchasing practices, policies and expectations, consistent execution of quality requirements, and production of items that meet design objectives.

Three purchasers each reported that they usually or sometimes purchase the lowest-priced product; no purchasers reported that they always or never purchase the lowest-priced product.

## Importance of specified purchase factors

Purchasers were asked to rate the importance of 17 factors in their purchasing decisions (table II-7). The factors rated as very important by more than half of responding purchasers were overall availability, delivery time, price, product consistency, quality meets industry standards, and reliability of supply (6 each); availability of private label, delivery terms, and payment terms (5 each); minimum quantity requirements and packaging (4 each).

**Table II-7**  
**Paper file folders: Count of U.S. purchasers' responses regarding importance of purchase factors, by factor**

Count in number of firms reporting

Factor	Very important	Somewhat important	Not important
Availability overall	6	0	0
Availability of branded	2	3	1
Availability of private label	5	1	0
Delivery terms	5	1	0
Delivery time	6	0	0
Discounts offered	1	4	1
Minimum quantity requirements	4	2	0
Packaging	4	2	0
Payment terms	5	1	0
Price	6	0	0
Product consistency	6	0	0
Product range	1	4	1
Quality meets industry standards	6	0	0
Quality exceeds industry standards	1	5	0
Reliability of supply	6	0	0
Technical support/service	2	3	1
U.S. transportation costs	3	3	0

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

## Lead times

Paper file folders are primarily sold from inventory. U.S. producers reported that \*\*\* percent of their commercial shipments came from inventories, with lead times averaging \*\*\* days. The remaining \*\*\* percent of their commercial shipments were produced-to-order, with lead times averaging \*\*\* days. U.S. importers reported that \*\*\* percent of their commercial shipments came from U.S. inventories, with a lead time averaging \*\*\* days, while \*\*\* percent of commercial shipments were produced-to-order with a lead time of \*\*\* days. The remaining \*\*\* percent of commercial shipments came from foreign inventories, with lead times averaging \*\*\* days.

## Supplier certification

Five of seven responding purchasers require their suppliers to become certified or qualified to sell paper file folders to their firm. Three purchasers reported the time to qualify a new supplier; \*\*\* reported that it takes between 30 to 120 days, \*\*\* reported 75 days, and \*\*\* reported 180 days. No purchasers reported that either domestic or foreign suppliers had failed in its attempt to qualify paper file folders or had lost approved status since 2020.

## Minimum quality specifications

As shown in table II-8, most responding purchasers reported that paper file folders produced in the United States and China always or usually met minimum quality specifications, and that they did not know whether or not paper file folders produced in Mexico or all other sources met minimum quality specifications. Half of responding purchasers reported that paper file folders from India and Vietnam always or usually met minimum quality specifications.

**Table II-8**  
**Paper file folders: Count of U.S. purchasers' responses regarding suppliers' ability to meet minimum quality specifications, by source**

Count in number of firms reporting

Source of purchases	Always	Usually	Sometimes	Rarely or never	Don't Know
United States	4	1	1	0	0
China	2	2	0	0	2
India	2	1	1	0	2
Vietnam	2	1	0	0	3
Mexico	3	0	0	0	3
All other sources	0	0	1	0	5

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

Note: Purchasers were asked how often domestically produced or imported paper file folders meets minimum quality specifications for their own or their customers' uses.

Reported important quality characteristics include durability, thickness, stiffness, surface smoothness, paperboard quality, workmanship, color, weight, hand feel/texture, and size. \*\*\* reported that the ability to consistently meet product specifications was important. \*\*\* reported that meeting or exceeding national brand standards and consistent quality were important.



## Changes in purchasing patterns

Three of seven responding purchasers reported that they had changed suppliers since January 1, 2020, while four reported that they had not. \*\*\* reported that it shifted to purchasing domestically using the same suppliers, while \*\*\* reported that it changed suppliers for a portion of its business due to supply constraints. \*\*\*.

Purchasers were also asked about changes in their purchasing patterns from different countries since January 1, 2020 (table II-9). Purchasers reported that their purchases of U.S.-produced product fluctuated down because of electronic filing \*\*\*, and ongoing cost increases \*\*\*. \*\*\* attributed sourcing shifts to its changes in purchasing patterns across all sources. \*\*\* reported that its purchases of U.S.-produced product increased because of uncertainty of subject and in-scope purchases due to the antidumping/countervailing duty investigation and continued product availability, costing, etc. \*\*\* reported that it stopped purchasing from China in \*\*\*, while \*\*\* reported that its purchases of paper file folders from China fluctuated down because of \*\*\*. \*\*\* also reported that its purchases from India increased \*\*\* and that its purchases from Mexico steadily decreased because of ongoing cost increases.

**Table II-9**  
**Paper file folders: Count of U.S. purchasers' responses regarding changes in purchase patterns from U.S., subject, and nonsubject countries**

Count in number of firms reporting

Source of purchases	Steadily Increase	Fluctuate Up	No change	Fluctuate Down	Steadily Decrease	Did not purchase
United States	0	1	1	4	1	0
China	0	0	3	1	0	2
India	1	1	1	0	0	3
Vietnam	0	2	2	0	0	2
Mexico	0	0	0	2	1	3
Nonsubject sources	0	1	0	0	0	5
Sources unknown	0	1	0	0	2	3

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

## **Purchase factor comparisons of domestic products, subject imports, and nonsubject imports**

Purchasers were asked a number of questions comparing paper file folders produced in the United States, subject countries, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 17 factors (table II-10) they were asked to rate the importance of.

Most responding purchasers reported that paper file folders from the United States were comparable to paper file folders produced in China on the eleven factors that more than half of purchasers ranked as very important, except for availability of private label and price. With respect to availability of private label paper file folders, two purchasers each reported that domestically produced file folders were comparable or inferior to file folders produced in China, while one purchaser each reported that they were comparable or inferior. Two purchasers reported that domestically produced file folders were superior compared to file folders produced in China on the availability of branded label paper file folders. With respect to paper file folders from the U.S. compared to those from India, all responding U.S. purchasers responded that domestically produced paper file folders were inferior on price. All responding purchasers also reported that paper file folders produced in India were comparable on quality meets industry standards and reliability of supply. No purchasers reported that domestically produced paper file folders were superior to paper file folders produced in India or Vietnam on the availability of private label. The majority of responding purchasers reported that paper file folders from the U.S. and Vietnam were comparable on all factors that more than half of purchasers ranked as very important except for availability of private label and price.

**Table II-10**  
**Paper file folders: Count of U.S. purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Count in number of firms reporting

<b>Factor</b>	<b>Country pair</b>	<b>Superior</b>	<b>Comparable</b>	<b>Inferior</b>
Availability overall	U.S. vs China	1	2	1
Availability of branded	U.S. vs China	2	1	1
Availability of private label	U.S. vs China	0	2	2
Delivery terms	U.S. vs China	0	3	0
Delivery time	U.S. vs China	3	0	1
Discounts offered	U.S. vs China	1	1	1
Minimum quantity requirements	U.S. vs China	2	2	0
Packaging	U.S. vs China	0	4	0
Payment terms	U.S. vs China	0	2	1
Price	U.S. vs China	0	1	3
Product consistency	U.S. vs China	0	4	0
Product range	U.S. vs China	2	1	1
Quality meets industry standards	U.S. vs China	0	4	0
Quality exceeds industry standards	U.S. vs China	1	2	1
Reliability of supply	U.S. vs China	0	4	0
Technical support/service	U.S. vs China	1	3	0
Availability overall	U.S. vs China	1	2	0

Table continued.

**Table II-10 Continued****Paper file folders: Count of U.S. purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Count in number of firms reporting

<b>Factor</b>	<b>Country pair</b>	<b>Superior</b>	<b>Comparable</b>	<b>Inferior</b>
Availability overall	U.S. vs India	1	2	1
Availability of branded	U.S. vs India	2	1	1
Availability of private label	U.S. vs India	0	2	2
Delivery terms	U.S. vs India	0	3	0
Delivery time	U.S. vs India	3	1	0
Discounts offered	U.S. vs India	1	2	0
Minimum quantity requirements	U.S. vs India	2	2	0
Packaging	U.S. vs India	1	3	0
Payment terms	U.S. vs India	0	2	1
Price	U.S. vs India	0	0	4
Product consistency	U.S. vs India	1	3	0
Product range	U.S. vs India	2	2	0
Quality meets industry standards	U.S. vs India	0	4	0
Quality exceeds industry standards	U.S. vs India	1	2	1
Reliability of supply	U.S. vs India	0	4	0
Technical support/service	U.S. vs India	1	3	0
Availability overall	U.S. vs India	1	2	0

Table continued.

**Table II-10 Continued****Paper file folders: Count of U.S. purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Count in number of firms reporting

<b>Factor</b>	<b>Country pair</b>	<b>Superior</b>	<b>Comparable</b>	<b>Inferior</b>
Availability overall	U.S. vs Vietnam	0	2	1
Availability of branded	U.S. vs Vietnam	2	0	1
Availability of private label	U.S. vs Vietnam	0	1	2
Delivery terms	U.S. vs Vietnam	0	3	0
Delivery time	U.S. vs Vietnam	3	0	0
Discounts offered	U.S. vs Vietnam	1	2	0
Minimum quantity requirements	U.S. vs Vietnam	1	2	0
Packaging	U.S. vs Vietnam	0	3	0
Payment terms	U.S. vs Vietnam	0	2	1
Price	U.S. vs Vietnam	0	1	2
Product consistency	U.S. vs Vietnam	0	3	0
Product range	U.S. vs Vietnam	1	2	0
Quality meets industry standards	U.S. vs Vietnam	0	3	0
Quality exceeds industry standards	U.S. vs Vietnam	0	2	1
Reliability of supply	U.S. vs Vietnam	0	3	0
Technical support/service	U.S. vs Vietnam	0	3	0
Availability overall	U.S. vs Vietnam	1	1	0

Table continued.

**Table II-10 Continued****Paper file folders: Count of U.S. purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Count in number of firms reporting

<b>Factor</b>	<b>Country pair</b>	<b>Superior</b>	<b>Comparable</b>	<b>Inferior</b>
Availability overall	U.S. vs Nonsubject sources	0	2	0
Availability of branded	U.S. vs Nonsubject sources	1	1	0
Availability of private label	U.S. vs Nonsubject sources	0	1	1
Delivery terms	U.S. vs Nonsubject sources	0	2	0
Delivery time	U.S. vs Nonsubject sources	1	1	0
Discounts offered	U.S. vs Nonsubject sources	1	1	0
Minimum quantity requirements	U.S. vs Nonsubject sources	1	1	0
Packaging	U.S. vs Nonsubject sources	0	2	0
Payment terms	U.S. vs Nonsubject sources	0	1	1
Price	U.S. vs Nonsubject sources	0	1	1
Product consistency	U.S. vs Nonsubject sources	0	2	0
Product range	U.S. vs Nonsubject sources	1	1	0
Quality meets industry standards	U.S. vs Nonsubject sources	0	2	0
Quality exceeds industry standards	U.S. vs Nonsubject sources	0	2	0
Reliability of supply	U.S. vs Nonsubject sources	0	2	0
Technical support/service	U.S. vs Nonsubject sources	0	2	0
Availability overall	U.S. vs Nonsubject sources	1	1	0

Table continued.

**Table II-10 Continued****Paper file folders: Count of U.S. purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Count in number of firms reporting

<b>Factor</b>	<b>Country pair</b>	<b>Superior</b>	<b>Comparable</b>	<b>Inferior</b>
Availability overall	China vs Nonsubject sources	0	1	0
Availability of branded	China vs Nonsubject sources	0	1	0
Availability of private label	China vs Nonsubject sources	0	1	0
Delivery terms	China vs Nonsubject sources	0	1	0
Delivery time	China vs Nonsubject sources	0	1	0
Discounts offered	China vs Nonsubject sources	0	1	0
Minimum quantity requirements	China vs Nonsubject sources	0	1	0
Packaging	China vs Nonsubject sources	0	1	0
Payment terms	China vs Nonsubject sources	0	1	0
Price	China vs Nonsubject sources	0	1	0
Product consistency	China vs Nonsubject sources	0	1	0
Product range	China vs Nonsubject sources	0	1	0
Quality meets industry standards	China vs Nonsubject sources	0	1	0
Quality exceeds industry standards	China vs Nonsubject sources	0	1	0
Reliability of supply	China vs Nonsubject sources	0	1	0
Technical support/service	China vs Nonsubject sources	0	1	0
Availability overall	China vs Nonsubject sources	0	1	0

Table continued.

**Table II-10 Continued****Paper file folders: Count of U.S. purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Count in number of firms reporting

<b>Factor</b>	<b>Country pair</b>	<b>Superior</b>	<b>Comparable</b>	<b>Inferior</b>
Availability overall	India vs Nonsubject sources	0	2	0
Availability of branded	India vs Nonsubject sources	0	2	0
Availability of private label	India vs Nonsubject sources	0	2	0
Delivery terms	India vs Nonsubject sources	0	2	0
Delivery time	India vs Nonsubject sources	0	2	0
Discounts offered	India vs Nonsubject sources	0	2	0
Minimum quantity requirements	India vs Nonsubject sources	0	2	0
Packaging	India vs Nonsubject sources	0	2	0
Payment terms	India vs Nonsubject sources	0	2	0
Price	India vs Nonsubject sources	1	1	0
Product consistency	India vs Nonsubject sources	0	2	0
Product range	India vs Nonsubject sources	0	2	0
Quality meets industry standards	India vs Nonsubject sources	0	2	0
Quality exceeds industry standards	India vs Nonsubject sources	0	2	0
Reliability of supply	India vs Nonsubject sources	0	2	0
Technical support/service	India vs Nonsubject sources	0	2	0
U.S. transportation costs	India vs Nonsubject sources	0	2	0

Table continued.

**Table II-10 Continued****Paper file folders: Count of U.S. purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Count in number of firms reporting

<b>Factor</b>	<b>Country pair</b>	<b>Superior</b>	<b>Comparable</b>	<b>Inferior</b>
Availability overall	Vietnam vs Nonsubject sources	0	1	0
Availability of branded	Vietnam vs Nonsubject sources	0	1	0
Availability of private label	Vietnam vs Nonsubject sources	0	1	0
Delivery terms	Vietnam vs Nonsubject sources	0	1	0
Delivery time	Vietnam vs Nonsubject sources	0	1	0
Discounts offered	Vietnam vs Nonsubject sources	0	1	0
Minimum quantity requirements	Vietnam vs Nonsubject sources	0	1	0
Packaging	Vietnam vs Nonsubject sources	0	1	0
Payment terms	Vietnam vs Nonsubject sources	0	1	0
Price	Vietnam vs Nonsubject sources	0	1	0
Product consistency	Vietnam vs Nonsubject sources	0	1	0
Product range	Vietnam vs Nonsubject sources	0	1	0
Quality meets industry standards	Vietnam vs Nonsubject sources	0	1	0
Quality exceeds industry standards	Vietnam vs Nonsubject sources	0	1	0
Reliability of supply	Vietnam vs Nonsubject sources	0	1	0
Technical support/service	Vietnam vs Nonsubject sources	0	1	0
U.S. transportation costs	Vietnam vs Nonsubject sources	0	1	0

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 paper file folders**

In order to determine whether U.S.-produced paper file folders can generally be used in the same applications as imports from China, India, and Vietnam, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables II-11 to II-13, both responding U.S. producers and nearly all responding importers reported that paper file folders were always interchangeable across all sources. All responding purchasers reported that paper file folders across all sources and always or frequently interchangeable.



**Table II-11****Paper file folders: Count of U.S. producers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	2	0	0	0
United States vs. India	2	0	0	0
United States vs. Vietnam	2	0	0	0
China vs. India	2	0	0	0
China vs. Vietnam	2	0	0	0
India vs. Vietnam	2	0	0	0
United States vs. Mexico	2	0	0	0
United States vs. Other	2	0	0	0
China vs. Mexico	2	0	0	0
China vs. Other	2	0	0	0
India vs. Mexico	2	0	0	0
India vs. Other	2	0	0	0
Vietnam vs. Mexico	2	0	0	0
Vietnam vs. Other	2	0	0	0
Mexico vs. Other	2	0	0	0

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

**Table II-12****Paper file folders: Count of importers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	8	1	0	0
United States vs. India	8	0	0	0
United States vs. Vietnam	8	1	0	0
China vs. India	6	0	0	0
China vs. Vietnam	7	0	0	0
India vs. Vietnam	6	0	0	0
United States vs. Mexico	7	0	0	0
United States vs. Other	7	0	0	0
China vs. Mexico	6	0	0	0
China vs. Other	6	0	0	0
India vs. Mexico	6	0	0	0
India vs. Other	6	0	0	0
Vietnam vs. Mexico	6	0	0	0
Vietnam vs. Other	6	0	0	0
Mexico vs. Other	6	0	0	0

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

**Table II-13**  
**Paper file folders: Count of purchasers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	3	3	0	0
United States vs. India	2	1	0	0
United States vs. Vietnam	2	2	0	0
China vs. India	1	1	0	0
China vs. Vietnam	2	0	0	0
India vs. Vietnam	1	0	0	0
United States vs. Mexico	2	1	0	0
United States vs. Other	1	0	0	0
China vs. Mexico	1	0	0	0
China vs. Other	1	0	0	0
India vs. Mexico	1	0	0	0
India vs. Other	1	0	0	0
Vietnam vs. Mexico	1	0	0	0
Vietnam vs. Other	1	0	0	0
Mexico vs. Other	1	0	0	0

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

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of paper file folders from the United States, subject, or nonsubject countries. As seen in tables II-14 to II-16, both responding U.S. producers reported that differences other than price were never significant across sources, while most responding importers reported that they were sometimes or never significant across sources. Purchasers' responses were more varied than those of producers or importers. Purchaser \*\*\* reported that quality, product range, minimum order quantity and financial contributions were important differences other than price. Similarly, importer/purchaser \*\*\* reported that across country pairs, consistent quality, reliability, and product design and availability were also important differences other than price. Importer/purchaser \*\*\* reported that quality was a difference other than price in sales of paper file folders from the United States or from India, and that the risk was higher for importing from India because of the larger quantities ordered.

**Table II-14**

**Paper file folders: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair**

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	0	0	0	2
United States vs. India	0	0	0	2
United States vs. Vietnam	0	0	0	2
China vs. India	0	0	0	2
China vs. Vietnam	0	0	0	2
India vs. Vietnam	0	0	0	2
United States vs. Mexico	0	0	0	2
United States vs. Other	0	0	0	2
China vs. Mexico	0	0	0	2
China vs. Other	0	0	0	2
India vs. Mexico	0	0	0	2
India vs. Other	0	0	0	2
Vietnam vs. Mexico	0	0	0	2
Vietnam vs. Other	0	0	0	2
Mexico vs. Other	0	0	0	2

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

**Table II-15**

**Paper file folders: Count of importers reporting the significance of differences between product produced in the United States and in other countries, by country pair**

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	0	2	3	3
United States vs. India	1	1	2	3
United States vs. Vietnam	0	2	3	3
China vs. India	0	0	3	3
China vs. Vietnam	0	0	4	3
India vs. Vietnam	0	0	3	3
United States vs. Mexico	0	0	2	3
United States vs. Other	0	1	2	3
China vs. Mexico	0	0	2	3
China vs. Other	0	0	3	3
India vs. Mexico	0	0	2	3
India vs. Other	0	0	2	3
Vietnam vs. Mexico	0	0	2	3
Vietnam vs. Other	0	0	3	3
Mexico vs. Other	0	0	2	3

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

**Table II-16****Paper file folders: Count of purchasers reporting the significance of differences between product produced in the United States and in other countries, by country pair**

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	2	1	3	0
United States vs. India	2	1	1	0
United States vs. Vietnam	1	1	2	0
China vs. India	2	0	2	0
China vs. Vietnam	1	0	2	0
India vs. Vietnam	1	0	2	0
United States vs. Mexico	1	0	1	1
United States vs. Other	0	0	1	0
China vs. Mexico	1	0	1	0
China vs. Other	0	0	1	0
India vs. Mexico	1	0	1	0
India vs. Other	0	0	1	0
Vietnam vs. Mexico	1	0	1	0
Vietnam vs. Other	0	0	1	0
Mexico vs. Other	0	0	1	0

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

## Elasticity estimates

This section discusses elasticity estimates; parties were encouraged to comment on these estimates as an attachment to their prehearing or posthearing brief.<sup>8</sup>

### U.S. supply elasticity

The domestic supply elasticity for paper file folders measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of paper file folders. 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 paper file folders. Analysis of these factors above indicates that the U.S. industry has the ability to greatly increase or decrease shipments to the U.S. market; an estimate in the range of 6 to 10 is suggested.

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<sup>8</sup> \*\*\*.

## **U.S. demand elasticity**

The U.S. demand elasticity for paper file folders measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of paper file folders. 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 paper file folders in the production of any downstream products. Based on the available information, the aggregate demand for paper file folders 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.<sup>9</sup> 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 paper file folders and imported paper file folders is likely to be in the range of 4 to 7. Factors contributing to this level of substitutability include high comparability across most purchase factors, little customer preference for a particular country of origin, interchangeability between domestic and subject sources, and limited significant factors other than price.

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<sup>9</sup> 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 subsidies and dumping margins is 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 three firms that accounted for the vast majority of U.S. production of paper file folders during 2022.

### U.S. producers

The Commission issued a U.S. producer questionnaire to six firms based on information contained in the petitions. Three firms provided usable data on their operations. Staff believes that these responses represent the vast majority of U.S. production of paper file folders. Table III-1 lists U.S. producers of paper file folders, their production locations, positions on the petitions, and shares of total production.

**Table III-1**  
**Paper file folders: U.S. producers, their positions on the petitions, production locations, and shares of reported production, 2022**

Share in percent

Firm	Position on petitions	Production location(s)	Share of production
BSP Filing	***	Kosciusko, Mississippi	***
Smead	Petitioner	Hastings, Minnesota Logan, Ohio Cedar City, Utah	***
TOPS	Petitioner	Union, Missouri	***
All firms	Various	Various	100.0

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

As indicated in table III-2, \*\*\* is related to a U.S. importer of the subject merchandise. In addition, as discussed in greater detail later in the report, \*\*\* directly import the subject merchandise. No responding U.S. producer purchased the subject merchandise from U.S. importers.

**Table III-2****Paper file folders: 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.

Table III-3 presents events in the U.S. industry since January 1, 2020.

**Table III-3****Paper file folders: Important industry events since January 1, 2020**

Item	Firm	Event
Plant closings and expansions	Smead	Smead announced plans to close their McAllen, Texas and Reynosa, Mexico manufacturing facilities and expand two others in Ohio and Utah as an "operations efficiency initiative."
Temporary shutdowns or curtailments	Smead	Smead closed its facility in Logan, Ohio during the COVID-19 pandemic for a few days in March and 10 days in April 2021.

Sources: Braithwaite, Andy, OPI (paid subscription), "Smead announces changes to manufacturing footprint,"

<https://www.opi.net/news/region/001-north-america/smead-announces-changes-to-manufacturing-footprint/>, November 19, 2019; Phillips, Jim. The Logan Daily News, "Smead Manufacturing to shut down for 10 days due to COVID," [https://www.logandaily.com/news/smead-manufacturing-to-shut-down-for-10-days-due-to-covid/article\\_391e0090-587a-5655-ba3e-eb06a4fa3fef.html](https://www.logandaily.com/news/smead-manufacturing-to-shut-down-for-10-days-due-to-covid/article_391e0090-587a-5655-ba3e-eb06a4fa3fef.html), March 25, 2021.

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of paper file folders since January 1, 2020. Two producers indicated in their questionnaire response that they had experienced such changes. Table III-4 presents the changes identified by these producers.

**Table III-4****Paper file folders: U.S. producers' reported changes in operations, since January 1, 2020**

Item	Firm name and narrative response on changes in operations
Plant closings	***
Plant closings	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Other	***

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



## U.S. production, capacity, and capacity utilization

Table III-5 presents data on U.S. producers' installed and practical capacity and production on the same equipment. The vast majority of practical capacity on shared equipment is dedicated to the production of paper file folders.

**Table III-5**  
**Paper file folders: U.S. producers' installed and practical capacity and production on the same equipment as in-scope production, by period**

Capacity and production in 1,000 folders; utilization in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical paper file folders	Capacity	***	***	***	***	***
Practical paper file folders	Production	***	***	***	***	***
Practical paper file folders	Utilization	***	***	***	***	***

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

Table III-6 presents U.S. producers' reported narratives regarding practical capacity constraints.

**Table III-6**  
**Paper file folders: U.S. producers' reported capacity constraints since January 1, 2020**

Item	Firm name and narrative response on constraints to practical overall capacity
Production bottlenecks	***
Production bottlenecks	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Supply of material inputs	***
Supply of material inputs	***
Fuel or energy	***
Logistics/transportation	***
Other constraints	***

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

Table III-7 and figure III-1 present data on U.S. producers' production, practical capacity, and capacity utilization.<sup>1</sup> Responding U.S. producers' practical capacity decreased by \*\*\* percent during 2020-22, with all of the decrease occurring from 2020 to 2021. \*\*\* of the decrease in practical capacity from 2020 to 2021 as \*\*\* of practical capacity throughout the period.<sup>2</sup> Responding U.S. producers' collective practical capacity was \*\*\* in January-June ("interim") 2023 and interim 2022. Responding U.S. producers' collective production fluctuated year to year, increasing from 2020 to 2021, then decreasing from 2021 to 2022, ending \*\*\* percent lower in 2022 than in 2020. \*\*\*.<sup>3</sup> U.S. producers' collective production was \*\*\* percent lower in interim 2023 than in interim 2022.<sup>4</sup>

Responding U.S. producers' average capacity utilization fluctuated year to year during 2020-22, increasing from 2020 to 2021, then decreasing from 2021 to 2022, ending \*\*\* percentage points lower in 2022 than in 2020. \*\*\*. Responding U.S. producers' average capacity utilization was \*\*\* percentage points lower in interim 2023 than in interim 2022, reaching a period-low. All three responding U.S. producers reported lower capacity utilization in interim 2023 than in interim 2022.

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<sup>1</sup> \*\*\*. \*\*\*, August 4, 2023, p. 1.

<sup>2</sup> \*\*\*. \*\*\*, October 31, 2022, p. 2.

<sup>3</sup> \*\*\*. \*\*\*, August 4, 2023, p. 1.

<sup>4</sup> \*\*\*. \*\*\*, August 4, 2023, p. 1 and \*\*\*, August 4, 2023, p. 1.

**Table III-7**  
**Paper file folders: U.S. producers' output, by firm and period**

**Practical capacity**

Capacity in 1,000 folders

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table III-7 Continued**  
**Paper file folders: U.S. producers' output, by firm and period**

**Production**

Production in 1,000 folders

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table III-7 Continued**  
**Paper file folders: U.S. producers' output, by firm and period**

**Capacity utilization**

Capacity utilization in percent

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table III-7 Continued**  
**Paper file folders: U.S. producers' output, by firm and period**

**Share of production**

Share of production in percent

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0

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

Note: Capacity utilization represents the ratio of the U.S. producer's production to its production capacity. Smead and TOPS reported their capacity based on operating \*\*\*. BSP Filing reported its capacity based on operating \*\*\*.

Note: With the exception of practical capacity, BSP Filing could not provide data for its operations in 2020 in its response to the Commission's questionnaire because \*\*\*. Email from \*\*\*, August 4, 2023. \*\*\*.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Figure III-1**  
**Paper file folders: U.S. producers' output, by period**

\* \* \* \* \*

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

## Alternative products

As shown in table III-8, \*\*\* of the product produced during 2020-22 by the responding U.S. producers was paper file folders. \*\*\*, reported producing \*\*\* using the same machinery.

**Table III-8**  
**Paper file folders: U.S. producers' overall production on the same equipment as in-scope production, by period**

Quantity in 1,000 folders; share in percent

Product type	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Paper file folders	Quantity	***	***	***	***	***
Excluded folders	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
Out of scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
Paper file folders	Share	***	***	***	***	***
Excluded folders	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
Out of scope products	Share	***	***	***	***	***
All products	Share	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

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

U.S. shipments accounted for \*\*\* of responding U.S. producers' total shipments in each year during 2020-22 and in interim 2023.<sup>5</sup> Responding U.S. producers' collective U.S. shipments fluctuated year to year, increasing from 2020 to 2021, then decreasing from 2021 to 2022, ending \*\*\* percent lower in 2022 than in 2020. \*\*\*.<sup>6</sup> The responding U.S. producers' collective U.S. shipments were \*\*\* percent lower in interim 2023 than in interim 2022, with all three firms reporting less U.S. shipments in interim 2023 than in interim 2022.

The value of responding U.S. producers' collective U.S. shipments also fluctuated year to year, with an increase from 2020 to 2021 followed by a decrease from 2021 to 2022. However, it ended \*\*\* percent higher in 2022 than in 2020. The value of responding U.S. producers' collective U.S. shipments was \*\*\* percent lower in interim 2023 than in interim 2022. Table III-9 presents data on U.S. producers' U.S. shipments, export shipments, and total shipments.

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<sup>5</sup> \*\*\*.

<sup>6</sup> \*\*\*. \*\*\*, August 4, 2023, p. 1 and \*\*\*, August 4, 2023, p. 1.

**Table III-9**  
**Paper file folders: U.S. producers' shipments, by destination and period**

Quantity in 1,000 folders; value in 1,000 dollars; unit value in dollars per 1,000 folders; share in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	***	***	***	***	***
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	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	100.0	100.0

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

The average unit value of responding U.S. producers' U.S. shipments increased in each year during 2020-22, ending \*\*\* percent higher, as the value increased despite the decrease in quantity.<sup>7</sup> \*\*\*.<sup>8</sup> The average unit value of responding U.S. producers' U.S. shipments was \*\*\* percent higher in interim 2023 than in interim 2022, reaching a period-high. \*\*\*.

<sup>7</sup> The unit value of \*\*\*. The unit value of \*\*\*.

<sup>8</sup> \*\*\*. \*\*\*, August 4, 2023, p. 1 and \*\*\*, August 4, 2023, p. 1.



By quantity, export shipments accounted for a small share of responding U.S. producers' total shipments throughout 2020-22 and in interim 2023.<sup>9</sup> The quantity of responding U.S. producers' export shipments decreased by \*\*\* percent during 2020-22 and was \*\*\* percent lower in interim 2023 than in interim 2022. The value of responding U.S. producers' export shipments moved in the same direction as quantity, decreasing by \*\*\* percent during 2020-22. However, it was \*\*\* percent higher in interim 2023 than in interim 2022. The unit value of responding producers' export shipments increased irregularly during 2020-22, ending \*\*\* percent higher in 2022 than in 2020. It was \*\*\* percent higher in interim 2023 than in interim 2022.

## **U.S. producers' inventories**

Responding U.S. producers' end-of-period inventories decreased in each year during 2020-22, ending \*\*\* percent lower in 2022 than in 2020.<sup>10</sup> It was \*\*\* percent lower in interim 2023 than in interim 2022. The ratio of responding U.S. producers' end-of-period inventories to their production decreased in each year during 2020-22, ending \*\*\* percentage points lower in 2022 than in 2020. However, it was \*\*\* percentage points higher in interim 2023 than in interim 2022. The ratio of responding U.S. producers' end-of-period inventories to their U.S. shipments also decreased in each year during 2020-22, ending \*\*\* percentage points lower in 2022 than in 2020. However, it was \*\*\* percentage points higher in interim 2023 than in interim 2022. Table III-10 presents data on U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments.

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<sup>9</sup> \*\*\*.

<sup>10</sup> \*\*\*.

**Table III-10**  
**Paper file folders: U.S. producers' inventories and their ratio to select items, by period**

Quantity in 1,000 folders; inventory ratio in percent

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
End-of-period inventory quantity	***	***	***	***	***
Inventory ratio to U.S. production	***	***	***	***	***
Inventory ratio to U.S. shipments	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***

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

## U.S. producers' imports from subject sources

\*\*\*, imported paper file folders from \*\*\*, while \*\*\* imported paper file folders from \*\*\*. The ratio of \*\*\* collective imports from \*\*\* to \*\*\* U.S. production did not exceed \*\*\* percent in any period for which data were collected. The ratio of \*\*\* collective imports from \*\*\* to \*\*\* U.S. production also did not exceed \*\*\* percent in any period for which data were collected. The ratio of \*\*\* imports from \*\*\* to its U.S. production did not exceed \*\*\* percent in any period for which data were collected. Tables III-11 and III-12 present data on responding U.S. producers' imports of paper file folders and table III-13 presents their reasons for importing paper file folders.

**Table III-11**  
**Paper file folders: \*\*\* U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity in 1,000 folders; ratio in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. production	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from subject sources	Quantity	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***
Imports from subject sources to U.S. production	Ratio	***	***	***	***	***

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. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Table III-12**

**Paper file folders: \*\*\* U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity in 1,000 folders; ratio in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. production	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “--”.

**Table III-13**

**Paper file folders: U.S. producers' reasons for importing**

Item	Narrative response on reasons for importing
*** reason for importing	***
*** reason for importing	***

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

## **U.S. producers' purchases of imports from subject sources**

No responding U.S. producer reported purchases of imports of paper file folders from subject sources during 2020-22 and both interim periods.

## U.S. employment, wages, and productivity

The number of production related workers (“PRWs”) fluctuated year to year during 2020-22, increasing from 2020 to 2021, then decreasing from 2021 to 2022, ending \*\*\* percent higher in 2022 than in 2020. However, it was \*\*\* percent lower in interim 2023 than in interim 2022. Productivity also fluctuated year to year, increasing from 2020 to 2021, then decreasing from 2021 to 2022. However, it ended \*\*\* percent lower in 2022 than in 2020. Productivity was \*\*\* percent lower in interim 2023 than in interim 2022. Unit labor costs fluctuated year to year during 2020-22, decreasing from 2020 to 2021, then increasing from 2021 to 2022, ending \*\*\* percent higher in 2022 than in 2020. It was \*\*\* percent higher in interim 2023 than in interim 2022. Total hours worked, hours worked per PRW, and wages paid were all lower in 2022 than in 2020, and in interim 2023, compared with interim 2022, while hourly wages were higher. Table III-14 presents U.S. producers’ employment-related data.

**Table III-14**

**Paper file folders: U.S. producers’ employment-related information, by period**

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Production and related workers (PRWs) (number)	***	***	***	***	***
Total hours worked (1,000 hours)	***	***	***	***	***
Hours worked per PRW (hours)	***	***	***	***	***
Wages paid (\$1,000)	***	***	***	***	***
Hourly wages (dollars per hour)	***	***	***	***	***
Productivity (folders per hour)	***	***	***	***	***
Unit labor costs (dollars per 1,000 folders)	***	***	***	***	***

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 20 firms believed to be importers of subject paper file folders, as well as to all U.S. producers of paper file folders.<sup>1</sup> Usable questionnaire responses were received from 12 companies, representing \*\*\* percent of U.S. imports from China and over \*\*\* percent of imports from India, Vietnam, and nonsubject sources under HTS statistical reporting number 4820.30.0040, a “basket” category in 2022. Table IV-1 lists all responding U.S. importers of paper file folders from China, Vietnam, India, and other sources, their locations, and their shares of U.S. imports, in 2022.

**Table IV-1**  
**Paper file folders: U.S. importers, their headquarters, and share of imports within each source, 2022**

Share in percent

Firm	Headquarters	China	India	Vietnam	Subject sources
C-Line Products	Mount Prospect, IL	***	***	***	***
Dollar General	Goodlettsville, TN	***	***	***	***
Dollar Tree	Chesapeake, VA	***	***	***	***
Franklin Creative Solutions	Huntsville, AL	***	***	***	***
Meijer	Grand Rapids, MI	***	***	***	***
Smead	Hastings, MN	***	***	***	***
Staples	Framingham, MA	***	***	***	***
Target	Minneapolis, MN	***	***	***	***
TOPS	Naperville, IL	***	***	***	***
U Brands	San Juan Capistrano, CA	***	***	***	***
Veyer	Boca Raton, FL	***	***	***	***
Walmart	Bentonville, AR	***	***	***	***
All firms	Various	100.0	100.0	100.0	100.0

Table continued.

<sup>1</sup> The Commission issued questionnaires to those firms identified in the petitions, 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 statistical reporting number 4820.30.0040.

**Table IV-1 Continued**  
**Paper file folders: U.S. importers, their headquarters, and share of imports within each source, 2022**

Share in percent

<b>Firm</b>	<b>Headquarters</b>	<b>Mexico</b>	<b>All other sources</b>	<b>Nonsubject sources</b>	<b>All import sources</b>
C-Line Products	Mount Prospect, IL	***	***	***	***
Dollar General	Goodlettsville, TN	***	***	***	***
Dollar Tree	Chesapeake, VA	***	***	***	***
Franklin Creative Solutions	Huntsville, AL	***	***	***	***
Meijer	Grand Rapids, MI	***	***	***	***
Smead	Hastings, MN	***	***	***	***
Staples	Framingham, MA	***	***	***	***
Target	Minneapolis, MN	***	***	***	***
TOPS	Naperville, IL	***	***	***	***
U Brands	San Juan Capistrano, CA	***	***	***	***
Veyer	Boca Raton, FL	***	***	***	***
Walmart	Bentonville, AR	***	***	***	***
All firms	Various	100.0	100.0	100.0	100.0

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

Note: Veyer LLC is related to Office Depot under the ownership of The ODP Corporation. Veyer LLC is The ODP Corporation's supply chain, distribution, procurement, and global sourcing operation and provides those services to Office Depot. See Form 10-K of The ODP Corporation, December 31, 2022, pp. 3 and 6.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

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

## **U.S. imports**

Subject imports, by quantity, accounted for a minority of total imports in 2020 and 2021 but a majority in 2022. Among the subject sources, India accounted for the largest share of total imports in 2020 and 2021, while Vietnam accounted for the largest share in 2022. China accounted for the second largest share of total imports among subject sources in 2020 and the smallest share in 2021 and 2022.

Subject imports accounted for a noticeably larger share of total imports in interim 2023 than in interim 2022, with Vietnam accounting for the majority of those imports. India accounted for the second largest share among subject sources in interim 2023, while China’s share reached a period-low (\*\*\*) percent). U.S. imports from Mexico accounted for the majority of total imports in 2020 and 2021, but a minority in 2022. Its share of imports was noticeably lower in interim 2023 than in interim 2022. Among the individual sources, only China accounted for a smaller share than Mexico in interim 2023. Table IV-2 presents data on U.S. imports of paper file folders.<sup>2</sup>

**Table IV-2**  
**Paper file folders: U.S. imports by source and period**

Quantity in 1,000 folders; value in 1,000 dollars; unit value in dollars per 1,000 folders

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
China	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Mexico	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
China	Value	***	***	***	***	***
India	Value	***	***	***	***	***
Vietnam	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Mexico	Value	***	***	***	***	***
All other sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
China	Unit value	***	***	***	***	***
India	Unit value	***	***	***	***	***
Vietnam	Unit value	***	***	***	***	***
Subject sources	Unit value	***	***	***	***	***
Mexico	Unit value	***	***	***	***	***
All other sources	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	***	***	***	***	***

Table continued.

<sup>2</sup> Appendix D presents data for U.S. imports of paper file folders on a weight basis.

**Table IV-2 Continued**  
**Paper file folders: U.S. imports by source and period**

Share and ratio in percent; ratio represent the ratio to U.S. production

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
China	Share of quantity	***	***	***	***	***
India	Share of quantity	***	***	***	***	***
Vietnam	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	***	***	***	***	***
Mexico	Share of quantity	***	***	***	***	***
All other sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
China	Share of value	***	***	***	***	***
India	Share of value	***	***	***	***	***
Vietnam	Share of value	***	***	***	***	***
Subject sources	Share of value	***	***	***	***	***
Mexico	Share of value	***	***	***	***	***
All other sources	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
China	Ratio	***	***	***	***	***
India	Ratio	***	***	***	***	***
Vietnam	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Mexico	Ratio	***	***	***	***	***
All other sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”. Because of rounding, figures may not add up to totals shown.



**Figure IV-1**  
**Paper file folders: U.S. import quantities and average unit values, by source and period**

\* \* \* \* \*

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

U.S. imports from China, by quantity, decreased by \*\*\* percent during 2020-22, with nearly all of the decrease occurring from 2020 to 2021.<sup>3</sup> <sup>4</sup> \*\*\* accounted for the vast majority of the decrease from 2020 to 2021.<sup>5</sup> U.S. imports from China were \*\*\* percent lower in interim 2023 than in interim 2022.

Conversely, U.S. imports from India increased by \*\*\* percent during 2020-22, with the vast majority of the increase occurring from 2021 to 2022. \*\*\* accounted for \*\*\* of the increase, with \*\*\* reporting more notable increases in imports from India between 2021 and 2022.<sup>6</sup> U.S. imports from India were \*\*\* percent higher in interim 2023 than in interim 2022.  
\*\*\*

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<sup>3</sup> \*\*\*.

<sup>4</sup> Overall, out-of-scope merchandise accounted for the majority and growing share (\*\*\* percent in 2020, \*\*\* percent in 2021, and \*\*\* percent in 2022) of all responding U.S. importers' U.S. imports from China classified under HTS statistical reporting number 4820.30.0040 during 2020-22. Such imports accounted for \*\*\* percent of all reported imports from China classified under HTS statistical reporting number 4820.30.0040 in interim 2023.

<sup>5</sup> After importing \*\*\* paper file folders from China in 2020, \*\*\*. Email from \*\*\*, August 15, 2023.

<sup>6</sup> \*\*\*. Email from \*\*\*, August 17, 2023. \*\*\*. \*\*\*, August 7, 2023, p. 2.

in interim 2023 than in interim 2022, offsetting the decreases reported by \*\*\*.<sup>7</sup>

U.S. imports from Vietnam moved in the same direction as U.S. imports from India, increasing by \*\*\* during 2020-22, with the vast majority of the increase occurring from 2021 to 2022. \*\*\* accounted for \*\*\* imports from Vietnam in 2020 and 2021 and each firm reported an increase in its imports during that period. The increase from 2021 to 2022 reflects \*\*\*.<sup>8</sup> U.S. imports from Vietnam were \*\*\* in interim 2023 than in interim 2022. \*\*\* each reported more imports in interim 2023 than in interim 2022, offsetting the lower quantity of imports reported by \*\*\*.<sup>9</sup>

Overall, the quantity of subject imports increased by \*\*\* percent during 2020-22, with most of the increase occurring from 2021 to 2022. The decrease in U.S. imports from China was offset by coinciding increases in U.S. imports from India and Vietnam, most notably from 2021 to 2022. The quantity of subject imports was \*\*\* percent higher in interim 2023 than in interim 2022.

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<sup>7</sup> The difference in the quantity of U.S. imports from India between the interim periods reflects the aforementioned decisions by \*\*. \*\*, August 7, 2023, p. 2. and email from \*\*, August 17, 2023.

<sup>8</sup> \*\*. \*\*, August 7, 2023, p. 3 and \*\*, pp. 2-3.

<sup>9</sup> The difference in the quantity of imports between the interim periods largely reflects the aforementioned decision by \*\*.

The quantity of U.S. imports from Mexico, the largest nonsubject source, fluctuated year to year, increasing from 2020 to 2021, then decreasing from 2021 to 2022, ending \*\*\* percent lower in 2022 than in 2020. Among the three firms that reported imports from Mexico, two reported less imports in 2022 than in 2020.<sup>10</sup> They were \*\*\* percent lower in interim 2023 than in interim 2022 as \*\*\* each reported less imports in interim 2023 than in interim 2022.<sup>11</sup> Imports from all other sources were \*\*\* higher in interim 2023 than in interim 2022.<sup>12</sup>

By value, U.S. imports from China decreased irregularly by \*\*\* percent during 2020-22 and was \*\*\* percent lower in interim 2023 than in interim 2022. The value of U.S. imports from India increased in each year during 2020-22, ending \*\*\* percent higher in 2022 than in 2020. It was \*\*\* percent higher in interim 2023 than in interim 2022. U.S. imports from Vietnam, by value, also increased in each year during 2020-22, ending \*\*\* percent higher in 2022 than in 2020. It was \*\*\* higher in interim 2023 than in interim 2022.

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<sup>10</sup> \*\*\*. \*\*\*, October 31, 2022, p. 5.

Smead closed its facility in Reynosa, Mexico in 2020 and moved that business to its facilities in the United States. Conference transcript, p. 27 (Avant). \*\*\*, \*\*\*, August 7, 2023, p. 3.

<sup>11</sup> The difference in the quantity of \*\*\* imports between the interim periods reflects the firm's \*\*\*. \*\*\*, August 4, 2023, p. 2. The difference in \*\*\* imports between the interim periods is due to aforementioned decision to \*\*\*. \*\*\*, August 7, 2023, p. 3 and \*\*\*, pp. 2-3.

<sup>12</sup> The difference in imports from all other sources between the interim periods is largely attributable to \*\*\* operations. \*\*\* accounted for \*\*\* percent of all reported imports from all other sources in interim 2023. According to the firm's response to the Commission's questionnaire, \*\*\*. TCS is expected to invest \$3 million to establish a stationery product facility in the special economic zone of Sihanoukville Province, Cambodia. "CDC Approves 11 Investment Projects Worth US\$57.9m in Four Provinces," <https://construction-property.com/cdc-approves-eleven-investment-projects-worth-us57-9m-in-4-provinces/>, accessed September 14, 2023.

Overall, the value of subject imports largely mirrored the changes in the values of U.S. imports from India and Vietnam, ending \*\*\* percent higher in 2022 than in 2020, after yearly increases. It was \*\*\* percent higher in interim 2023 than in interim 2022. The value of U.S. imports from Mexico fluctuated year to year, increasing from 2020 to 2021, then decreasing from 2021 to 2022, ending \*\*\* percent higher in 2022 than in 2020. However, it was \*\*\* percent lower in interim 2023 than in interim 2022.

The unit value of U.S. imports from China increased in each year during 2020-22, ending \*\*\* percent higher in 2022 than in 2020 and remaining higher than the unit values of U.S. imports from India and Vietnam. It was \*\*\* percent higher in interim 2023 than in interim 2022, reaching a period high. After a modest increase from 2020 to 2021, the unit value of U.S. imports from India decreased more noticeably from 2021 to 2022, ending \*\*\* percent lower than in 2020.<sup>13</sup> It was \*\*\* percent lower in interim 2023 than in interim 2022. The unit value of imports from Vietnam also fluctuated year to year, increasing from 2020 to 2021, then decreasing from 2021 to 2022, ending \*\*\* percent lower in 2022 than in 2020.<sup>14</sup> Despite the decrease, the unit value of imports from Vietnam remained higher than the unit value of imports from India in each year during 2020-22. The unit value of imports from Vietnam was \*\*\* percent higher in interim 2023 than in interim 2022.

Overall, the unit value of subject imports largely mirrored the changes in the unit values of U.S. imports from India and Vietnam, increasing from 2020 to 2021, then decreasing from 2021 to 2022, ending \*\*\* percent lower in 2022 than in 2020. It was \*\*\* percent lower in interim 2023 than in interim 2022, reaching a period low. The unit value of U.S. imports from Mexico fluctuated year to year, decreasing from 2020 to 2021, then increasing from 2021 to 2022, ending \*\*\* percent higher in 2022 than in 2020. It was more than two times higher in

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<sup>13</sup> The change in the unit value of imports from India largely reflects \*\*\* operations as \*\*\* during 2020-22. Representatives from \*\*\* reported that \*\*\*. Email from \*\*\*, August 17, 2023.

<sup>14</sup> The increase in the unit value in 2020 and 2021 largely reflect \*\*\* operations as \*\*\* reported an increase during that period. The more noticeable decrease from 2021 to 2022 reflects \*\*\*. According to its response to the Commission's questionnaire, the majority (\*\*\*) of \*\*\* U.S. shipments of imports from Vietnam in 2022 was \*\*\*.

interim 2023 than in interim 2022.<sup>15</sup> Despite the year-to-year fluctuation, the unit value of U.S. imports from Mexico remained higher than the unit values of imports from each of the subject sources in every year during 2020-22 and in both interim periods. Table IV-3 presents data on the changes in import quantity, value, and unit value between comparison periods

**Table IV-3**  
**Paper file folders: Changes in import quantity, values, and unit values between comparison periods**

Change in percent

Source	Measure	2020-22	2020-21	2021-22	Jan-Jun 2022-23
China	%Δ Quantity	▼***	▼***	▼***	▼***
India	%Δ Quantity	▲***	▲***	▲***	▲***
Vietnam	%Δ Quantity	▲***	▲***	▲***	▲***
Subject sources	%Δ Quantity	▲***	▲***	▲***	▲***
Mexico	%Δ Quantity	▼***	▲***	▼***	▼***
All other sources	%Δ Quantity	***	***	***	▲***
Nonsubject sources	%Δ Quantity	▼***	▲***	▼***	▼***
All import sources	%Δ Quantity	▲***	▲***	▲***	▲***
China	%Δ Value	▼***	▼***	▲***	▼***
India	%Δ Value	▲***	▲***	▲***	▲***
Vietnam	%Δ Value	▲***	▲***	▲***	▲***
Subject sources	%Δ Value	▲***	▲***	▲***	▲***
Mexico	%Δ Value	▲***	▲***	▼***	▼***
All other sources	%Δ Value	***	***	***	▲***
Nonsubject sources	%Δ Value	▲***	▲***	▼***	▼***
All import sources	%Δ Value	▲***	▲***	▲***	▲***
China	%Δ Unit value	▲***	▲***	▲***	▲***
India	%Δ Unit value	▼***	▲***	▼***	▼***
Vietnam	%Δ Unit value	▼***	▲***	▼***	▲***
Subject sources	%Δ Unit value	▼***	▲***	▼***	▼***
Mexico	%Δ Unit value	▲***	▼***	▲***	▲***
All other sources	%Δ Unit value	***	***	***	▲***
Nonsubject sources	%Δ Unit value	▲***	▼***	▲***	▲***
All import sources	%Δ Unit value	▼***	▼***	▼***	▼***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “--”.

<sup>15</sup> The difference in the unit value of imports from Mexico between the interim periods largely reflects \*\*\*. \*\*\*, August 4, 2023, p. 2.

Table IV-4 presents data on U.S. imports by U.S. producers or firms related to U.S. producers. Such imports accounted for no more than \*\*\* percent of subject-source imports during 2020-22. They accounted for \*\*\* percent of subject-source imports in interim 2023, compared with \*\*\* percent in interim 2022.

U.S. imports by U.S. producers or firms related to U.S. producers accounted for a growing share of imports from nonsubject-source imports, primarily from Mexico, during 2020-22. Such imports accounted for a smaller share nonsubject-source imports in interim 2023 than in interim 2022. Overall, imports by U.S. producers or firms related to U.S. producers accounted for between \*\*\* percent and \*\*\* percent of all U.S. imports during 2020-22 and \*\*\* percent in interim 2023.

**Table IV-4**  
**Paper file folders: U.S. imports by U.S. producers and/or affiliated firms**

Quantity in 1,000 folders, ratio in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
China	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Mexico	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
China	Ratio	***	***	***	***	***
India	Ratio	***	***	***	***	***
Vietnam	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Mexico	Ratio	***	***	***	***	***
All other sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

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

Note: U.S. imports by U.S. producers' or firms related to U.S. producers are based on data compiled in responses to the Commission's questionnaire by U.S. producers' and their related importers. These ratios are calculated using data shown in this table (numerators) and in table IV-2 (denominators).

Note: Ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

## Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.<sup>16</sup> 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.<sup>17</sup> Table IV-5 presents the share of total U.S. imports, by number of folders, attributable to China, India, Vietnam, and nonsubject sources during the most recent twelve-month period preceding the filing of the petitions based on responses to the Commission questionnaires and adjusted official U.S. import statistics.<sup>18</sup>

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<sup>16</sup> 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)).

<sup>17</sup> Section 771 (24) of the Act (19 U.S.C § 1677(24)).

<sup>18</sup> Appendix D presents the share of total U.S. imports, on a weight basis, attributable to each source during the most recent twelve-month period preceding the filing of the petitions based on responses to the Commission's questionnaires and adjusted official U.S. import statistics.



**Table IV-5**  
**Paper file folders: U.S. imports in the twelve-month period preceding the filing of the petitions, October 2021 through September 2022**

Source of imports	Quantity (1,000 folders)	Share of quantity (percent)	Adjusted official import statistics (1,000 pounds)	Share of quantity (percent)
China	***	***	***	***
India	***	***	***	***
Vietnam	***	***	***	***
Mexico	***	***	***	***
All other sources	***	***	***	***
All import sources	***	100.0	***	100.0

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting number 4820.30.0040, accessed July 13, 2023. Imports are based on the imports for consumption data series.

Note: Official U.S. import statistics were adjusted to remove out-of-scope imports classified under HTS statistical reporting number 4820.30.0040 and add in-scope imports classified under other HTS statistical reporting numbers as reported in responses to Commission questionnaires. Because of rounding, figures may not add up to totals shown.

## Cumulation considerations

In assessing whether imports should be cumulated, the Commission determines whether U.S. imports from the subject countries compete with each other and with the domestic like product and has generally considered four factors: (1) fungibility, (2) presence of sales or offers to sell in the same geographical markets, (3) common or similar channels of distribution, and (4) simultaneous presence in the market. Information regarding channels of distribution, market areas, and interchangeability appear in Part II. Additional information concerning fungibility, geographical markets, and simultaneous presence in the market is presented below.

## Fungibility

Table IV-6 and figure IV-2 present data on U.S. producers' and U.S. importers' U.S. shipments of paper file folders by product type in 2022.<sup>19</sup> Manila folders accounted for the majority of U.S. producers' U.S. shipments and U.S. shipments of imports from each subject source. Folders other than manila, hanging, fastener, or expanding accounted for the second largest share of U.S. shipments of imports from each subject source, while hanging folders accounted for the second largest share of U.S. producers' U.S. shipments.

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<sup>19</sup> Appendix E presents additional data on U.S. producers' and U.S. importers' U.S. shipments by product type.

**Table IV-6**  
**Paper file folders: U.S. producers' and U.S. importers' U.S. shipments by source and product type, 2022**

Quantity in 1,000 folders

Source	Manila	Hanging	Fastener	Expanding	Other	All product types
U.S. producers	***	***	***	***	***	***
China	***	***	***	***	***	***
India	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Mexico	***	***	***	***	***	***
All other sources	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All import sources	***	***	***	***	***	***
All sources	***	***	***	***	***	***

Table continued.

**Table IV-6 Continued**  
**Paper file folders: U.S. producers' and U.S. importers' U.S. shipments by source and product type, 2022**

Share across in percent

Source	Manila	Hanging	Fastener	Expanding	Other	All product types
U.S. producers	***	***	***	***	***	100.0
China	***	***	***	***	***	100.0
India	***	***	***	***	***	100.0
Vietnam	***	***	***	***	***	100.0
Subject sources	***	***	***	***	***	100.0
Mexico	***	***	***	***	***	100.0
All other sources	***	***	***	***	***	100.0
Nonsubject sources	***	***	***	***	***	100.0
All import sources	***	***	***	***	***	100.0
All sources	***	***	***	***	***	100.0

Table continued.

**Table IV-6 Continued**  
**Paper file folders: U.S. producers' and U.S. importers' U.S. shipments by source and product type, 2022**

Share down in percent

Source	Manila	Hanging	Fastener	Expanding	Other	All product types
U.S. producers	***	***	***	***	***	***
China	***	***	***	***	***	***
India	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Mexico	***	***	***	***	***	***
All other sources	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All import sources	***	***	***	***	***	***
All sources	100.0	100.0	100.0	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. Zeroes, null values, and undefined calculations are suppressed and shown as "--". Because of rounding, figures may not add up to totals shown.

**Figure IV-2**  
**Paper file folders: U.S. producers' and U.S. importers' U.S. shipments by source and product type, 2022**

\* \* \* \* \*

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

U.S. producers accounted for the majority of U.S. shipments of manila, hanging, and fastener folders. Imports from Vietnam accounted for the majority of U.S. shipments of folders other than manila, hanging, fastener, or expanding. U.S. imports from Mexico accounted for the vast majority of U.S. shipments of expanding folders and the second largest share of U.S. shipments of fastener folders.

Table IV-7 and figure IV-3 present data on U.S. producers' and U.S. importers' U.S. shipments of paper file folders to retailers by branding in 2022.<sup>20</sup> Private label accounted for the majority of U.S. producers' U.S. shipments and the vast majority of U.S. shipments of imports from each subject source. U.S. producers accounted for the vast majority of U.S. shipments of branded paper file folders and the largest share of U.S. shipments of private label paper file folders. Imports from Vietnam accounted for the second largest share of U.S. shipments of private label paper file folders, while imports from India accounted for the third largest share. Imports from each subject source accounted for no more than \*\*\* percent of all U.S. shipments of branded paper file folders.

**Table IV-7  
Paper file folders: U.S. producers' and U.S. importers' U.S. shipments by source and branding type, 2022**

Quantity in 1,000 folders

Source	Branded	Private label	All other	All branding
U.S. producers	***	***	***	***
China	***	***	***	***
India	***	***	***	***
Vietnam	***	***	***	***
Subject sources	***	***	***	***
Mexico	***	***	***	***
All other sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued.

<sup>20</sup> Appendix F presents data on the market of U.S. shipments by channel of distribution and branding type during 2020-22 and both interim periods.

**Table IV-7 Continued**  
**Paper file folders: U.S. producers' and U.S. importers' U.S. shipments by source and branding type, 2022**

Share across in percent

Source	Branded	Private label	All other	All branding
U.S. producers	***	***	***	100.0
China	***	***	***	100.0
India	***	***	***	100.0
Vietnam	***	***	***	100.0
Subject sources	***	***	***	100.0
Mexico	***	***	***	100.0
All other sources	***	***	***	100.0
Nonsubject sources	***	***	***	100.0
All import sources	***	***	***	100.0
All sources	***	***	***	100.0

Table continued.

**Table IV-7 Continued**  
**Paper file folders: U.S. producers' and U.S. importers' U.S. shipments by source and branding type, 2022**

Share down in percent

Source	Branded	Private label	All other	All branding
U.S. producers	***	***	***	***
China	***	***	***	***
India	***	***	***	***
Vietnam	***	***	***	***
Subject sources	***	***	***	***
Mexico	***	***	***	***
All other sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	100.0	100.0	100.0	100.0

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

Note: Data in this table reflect only U.S. shipments of branded and private-label products to retailers.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--". Because of rounding, figures may not add up to totals shown.

**Figure IV-3**  
**Paper file folders: U.S. producers' and U.S. importers' U.S. shipments by source and branding, 2022**

\* \* \* \* \*

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

### **Geographical markets**

According to official import statistics, imports from each subject source entered the United States through ports in every region. Most U.S. imports from China entered through ports located in the East or West. The majority of imports from India entered the United States through ports located in the East, while the majority of imports from Vietnam entered through ports located in the East or West. Overall, the majority of subject imports entered the United States through ports located in the East or West. Table IV-8 presents data on U.S. imports of paper file folders by border of entry in 2022.

**Table IV-8**  
**Paper file folders: U.S. imports by source and border of entry, 2022**

Quantity in 1,000 pounds

Source	East	North	South	West	All borders
China	3,904	1,923	2,786	5,712	14,325
India	6,944	862	2,889	1,723	12,418
Vietnam	9,957	3,647	6,022	14,211	33,837
Subject sources	20,805	6,432	11,697	21,646	60,580
Mexico	2	---	27,158	9	27,169
All other sources	956	1,912	258	239	3,366
Nonsubject sources	958	1,912	27,417	248	30,535
All import sources	21,763	8,344	39,114	21,894	91,115

Table continued.

**Table IV-8 Continued**  
**Paper file folders: U.S. imports by source and border of entry, 2022**

Share across in percent

Source	East	North	South	West	All borders
China	27.3	13.4	19.4	39.9	100.0
India	55.9	6.9	23.3	13.9	100.0
Vietnam	29.4	10.8	17.8	42.0	100.0
Subject sources	34.3	10.6	19.3	35.7	100.0
Mexico	0.0	---	100.0	0.0	100.0
All other sources	28.4	56.8	7.7	7.1	100.0
Nonsubject sources	3.1	6.3	89.8	0.8	100.0
All import sources	23.9	9.2	42.9	24.0	100.0

Table continued.

**Table IV-8 Continued**  
**Paper file folders: U.S. imports by source and border of entry, 2022**

Share down in percent

Source	East	North	South	West	All borders
China	17.9	23.0	7.1	26.1	15.7
India	31.9	10.3	7.4	7.9	13.6
Vietnam	45.8	43.7	15.4	64.9	37.1
Subject sources	95.6	77.1	29.9	98.9	66.5
Mexico	0.0	---	69.4	0.0	29.8
All other sources	4.4	22.9	0.7	1.1	3.7
Nonsubject sources	4.4	22.9	70.1	1.1	33.5
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting number 4820.30.0040, accessed July 13, 2023. Imports are based on the imports for consumption data series.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

## Presence in the market

U.S. imports of paper file folders from each subject source were present in every month during January 2020-May 2023. Imports from each subject source typically peaked during May-August. Table IV-9 and figures IV-4 and IV-5 present monthly data for subject and nonsubject imports of paper file folders during January 2020-May 2023.

**Table IV-9**  
**Paper file folders: U.S. imports, by source and month**

Quantity in 1,000 pounds

Year	Month	China	India	Vietnam	Subject sources
2020	January	1,961	364	43	2,368
2020	February	2,080	439	125	2,644
2020	March	644	436	322	1,403
2020	April	2,029	339	771	3,139
2020	May	2,748	116	2,048	4,912
2020	June	3,823	143	2,263	6,228
2020	July	1,687	252	878	2,817
2020	August	525	706	793	2,025
2020	September	746	511	460	1,717
2020	October	675	158	384	1,218
2020	November	842	379	342	1,563
2020	December	771	764	744	2,280
2021	January	369	488	551	1,407
2021	February	812	621	534	1,967
2021	March	719	443	910	2,072
2021	April	539	440	627	1,606
2021	May	1,665	928	1,784	4,377
2021	June	2,377	765	2,318	5,459
2021	July	977	489	1,372	2,838
2021	August	737	301	1,712	2,750
2021	September	969	358	1,227	2,554
2021	October	688	648	963	2,299
2021	November	580	882	768	2,230
2021	December	513	597	1,160	2,271

Table continued.



**Table IV-9 Continued**  
**Paper file folders: U.S. imports, by source and month**

Quantity in 1,000 pounds

<b>Year</b>	<b>Month</b>	<b>China</b>	<b>India</b>	<b>Vietnam</b>	<b>Subject sources</b>
2022	January	719	537	956	2,212
2022	February	1,009	471	1,248	2,728
2022	March	1,229	437	900	2,566
2022	April	1,496	705	1,921	4,122
2022	May	1,643	1,559	4,678	7,881
2022	June	2,661	1,057	7,675	11,393
2022	July	1,773	1,351	4,063	7,187
2022	August	876	1,017	4,564	6,457
2022	September	927	999	2,034	3,959
2022	October	592	1,719	1,790	4,102
2022	November	540	1,118	1,873	3,530
2021	December	859	1,446	2,136	4,441
2023	January	1,028	754	3,957	5,739
2023	February	385	1,276	5,923	7,583
2023	March	576	1,283	3,124	4,983
2023	April	1,175	929	6,934	9,039
2023	May	1,099	853	2,910	4,863

Table continued.

**Table IV-9 Continued**  
**Paper file folders: U.S. imports, by source and month**

Quantity in 1,000 pounds

<b>Year</b>	<b>Month</b>	<b>Mexico</b>	<b>All other sources</b>	<b>Nonsubject sources</b>	<b>All import sources</b>
2020	January	3,483	170	3,653	6,021
2020	February	3,337	147	3,484	6,128
2020	March	3,634	109	3,743	5,146
2020	April	890	114	1,004	4,142
2020	May	591	61	653	5,565
2020	June	2,488	196	2,684	8,912
2020	July	2,491	118	2,609	5,426
2020	August	2,576	99	2,676	4,701
2020	September	2,378	101	2,479	4,196
2020	October	2,881	233	3,113	4,331
2020	November	2,871	167	3,038	4,600
2020	December	2,275	277	2,552	4,832
2021	January	1,779	75	1,854	3,261
2021	February	1,721	100	1,821	3,787
2021	March	2,166	98	2,263	4,335
2021	April	2,047	185	2,232	3,838
2021	May	2,707	175	2,883	7,260
2021	June	3,166	145	3,311	8,771
2021	July	3,446	115	3,561	6,400
2021	August	3,208	97	3,305	6,055
2021	September	3,276	178	3,454	6,008
2021	October	2,486	141	2,627	4,926
2021	November	3,194	143	3,337	5,568
2021	December	3,128	178	3,306	5,577

Table continued.

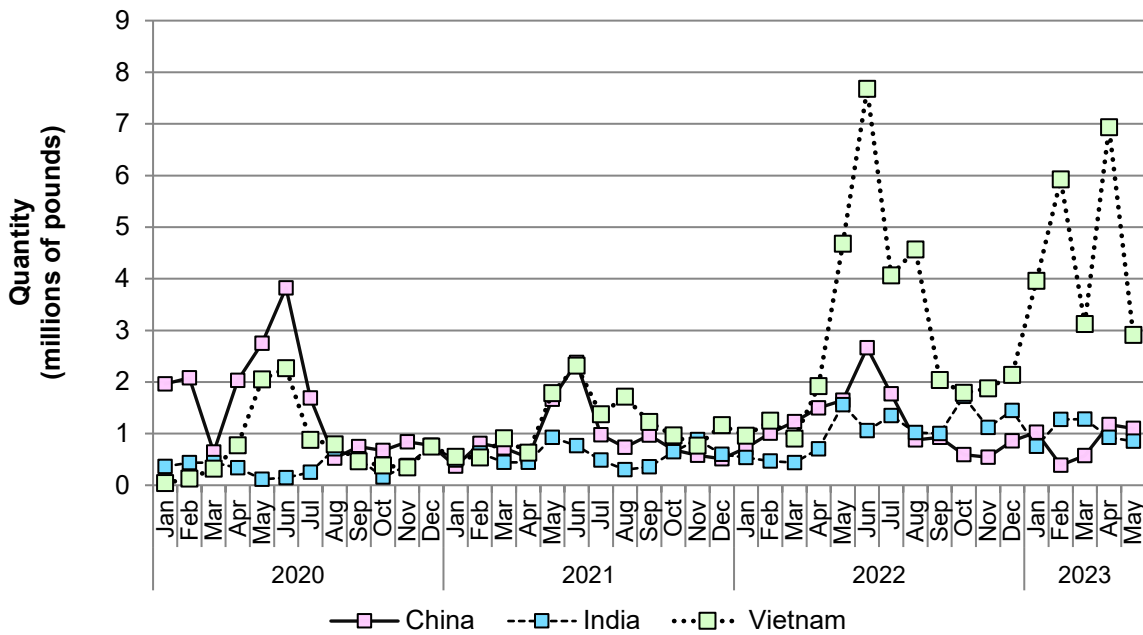
**Table IV-9 Continued**  
**Paper file folders: U.S. imports, by source and month**

Quantity in 1,000 pounds

<b>Year</b>	<b>Month</b>	<b>Mexico</b>	<b>All other sources</b>	<b>Nonsubject sources</b>	<b>All import sources</b>
2022	January	2,673	160	2,833	5,045
2022	February	2,541	121	2,663	5,391
2022	March	3,030	273	3,303	5,869
2022	April	2,146	127	2,273	6,395
2022	May	2,554	158	2,712	10,593
2022	June	2,618	300	2,918	14,311
2022	July	2,271	369	2,640	9,827
2022	August	2,470	442	2,911	9,369
2022	September	2,668	407	3,075	7,034
2022	October	1,927	463	2,390	6,492
2022	November	1,374	261	1,635	5,165
2021	December	897	285	1,182	5,624
2023	January	1,048	556	1,604	7,343
2023	February	1,124	584	1,708	9,291
2023	March	1,334	725	2,059	7,042
2023	April	1,200	527	1,727	10,766
2023	May	1,403	502	1,905	6,767

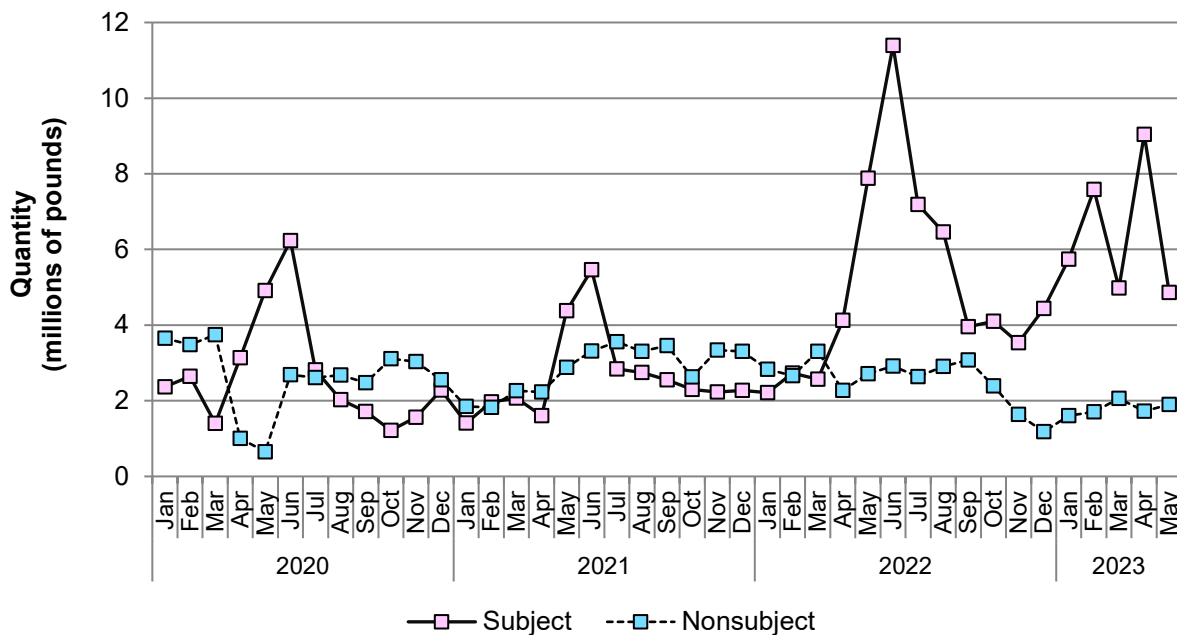
Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting number 4820.30.0040, accessed July 13, 2023. Imports are based on the imports for consumption data series.

**Figure IV-4**  
**Paper file folders: U.S. imports from individual subject sources, by month**



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting number 4820.30.0040, accessed July 13, 2023. Imports are based on the imports for consumption data series.

**Figure IV-5**  
**Paper file folders: U.S. imports from aggregated subject and nonsubject sources, by month**



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting number 4820.30.0040, accessed July 13, 2023. Imports are based on the imports for consumption data series.

## Apparent U.S. consumption and market shares

### Quantity

Apparent U.S. consumption increased in each year during 2020-22, ending \*\*\* percent higher in 2022 than in 2020. However, it was \*\*\* percent lower in interim 2023 than in interim 2022. The increase in apparent U.S. consumption from 2020 to 2021 is driven by the increases in U.S. producers’ U.S. shipments and U.S. shipments of imports from India and Vietnam, which offset the decreases in U.S. shipments of imports from China and Mexico.<sup>21</sup>

<sup>21</sup> For more detailed discussion on the trends in U.S. producers’ U.S. shipments, see part III and for more detailed discussion on trends in subject and nonsubject imports see the section entitled “U.S. imports.”

The increase in apparent U.S. consumption from 2021 to 2022 is largely driven by the increase in U.S. shipments of imports from India and Vietnam, which offset the decreases in U.S. producers' U.S. shipments and U.S. shipments of imports from Mexico. The difference in apparent U.S. consumption between the interim periods mostly reflects the difference in U.S. producers' U.S. shipments and U.S. shipments of imports from Mexico, which were lower in interim 2023 than in interim 2022. Conversely, U.S. shipments of imports from Vietnam and India each were higher. Table IV-10 and figure IV-6 present data on apparent U.S. consumption and U.S. market shares for paper file folders based on quantity.

**Table IV-10**  
**Paper file folders: Apparent U.S. consumption and market shares based on quantity, by source and period**

Quantity in 1,000 folders; share in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Mexico	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Mexico	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	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. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Because of rounding, figures may not add up to totals shown.

**Figure IV-6**

**Paper file folders: Apparent U.S. consumption based on quantity, by source and period**

\* \* \* \* \*

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

U.S. producers' market share, by quantity, \*\*\* from 2020 to 2021 then decreased by \*\*\* percentage points from 2021 to 2022. It was \*\*\* percentage points lower in interim 2023 than in interim 2022, reaching a period low. Conversely, the market shares of U.S. shipments of imports from India and Vietnam each increased in every year during 2020-22, most notably from 2021 to 2022, ending \*\*\* percentage points and \*\*\* percentage points higher, respectively, in 2022 than in 2020. Vietnam accounted for the largest market share among all individual import sources in 2022 after accounting for the smallest share in 2020. The market shares of U.S. shipments of imports from India and Vietnam were \*\*\* percentage points and \*\*\* percentage points higher, respectively, in interim 2023 than in interim 2022, reaching period highs.

The market share of U.S. shipments of imports from China decreased in each year during 2020-22, ending \*\*\* percentage points lower in 2022 than in 2020. It was \*\*\* percentage points lower in interim 2023 than in interim 2022, reaching a period low. Overall, the market share of U.S. shipments of subject imports increased in each year during 2020-22, most notably from 2021 to 2022, ending \*\*\* percentage points higher. It was \*\*\* percentage points higher in interim 2023 than in interim 2022, reaching a period high.

The market share of U.S. shipments of imports from Mexico decreased in each year during 2020-22, ending \*\*\* percentage points lower in 2022 than in 2020. U.S. shipments of imports from Mexico accounted for a smaller market share than U.S. shipments of imports from India and Vietnam in 2022 after accounting for the largest share among individual import sources in 2020 and 2021. It was \*\*\* percentage points lower in interim 2023 than in interim 2022, reaching a period low and remaining lower than the market shares held by U.S. shipments of imports from India and Vietnam. The market share of U.S. shipments of imports from all other sources was \*\*\* percent in 2022 and both interim periods.

## Value

The value of apparent U.S. consumption moved in the same direction as quantity, increasing in each year during 2020-22, ending \*\*\* percent higher in 2022 than in 2020. It was \*\*\* percent higher in interim 2023 than in interim 2022. The increase in the value of apparent U.S. consumption from 2020 to 2021 largely reflects the increase in the values of U.S. producers' U.S. shipments and U.S. shipments of imports from India and Vietnam, which offset the decrease in the values of U.S. shipments of imports from China and Mexico.

The increase in the value of apparent U.S. consumption from 2021 to 2022 largely reflects the increases in the values of U.S. shipments of imports from India and Vietnam, which offset the decreases in the values of U.S. producers' U.S. shipments and U.S. shipments of imports from Mexico. The difference in the value of apparent U.S. consumption between the interim periods largely reflects the differences in the values of U.S. shipments of imports from India and Vietnam, which were higher in interim 2023 than in interim 2022. Conversely, the values of U.S. producers' U.S. shipments and U.S. shipments of imports from China and Mexico were lower.

U.S. producers' market share, by value, fluctuated year to year, increasing from 2020 to 2021, then decreasing from 2021 to 2022, ending \*\*\* percentage points lower in 2022 than in 2020. It was \*\*\* percentage points lower in interim 2023 than in interim 2022, reaching a period low. The market shares of U.S. shipments of imports from India and Vietnam increased in each year during 2020-22, ending \*\*\* percentage points and \*\*\* percentage points higher, respectively, in 2022 than in 2020. The market shares of U.S. shipments of imports from India and Vietnam, were \*\*\* percentage points and \*\*\* percentage points higher, respectively, in interim 2023 than in interim 2022. Table IV-11 and figure IV-7 present data on apparent U.S. consumption and U.S. market shares for paper file folders based on value.



**Table IV-11**

**Paper file folders: Apparent U.S. consumption and market shares based on value, by source and period**

Value in 1,000 dollars; share in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. producers	Value	***	***	***	***	***
China	Value	***	***	***	***	***
India	Value	***	***	***	***	***
Vietnam	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Mexico	Value	***	***	***	***	***
All other sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Mexico	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	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. Zeroes, null values, and undefined calculations are suppressed and shown as "--". Because of rounding, figures may not add up to totals shown.

**Figure IV-7**

**Paper file folders: Apparent U.S. consumption based on value, by source and period**

\* \* \* \* \*

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

The market share of U.S. shipments of imports from China fluctuated year to year during 2020-22, decreasing from 2020 to 2021, then increasing from 2021 to 2022, ending \*\*\* percentage points lower in 2022 than in 2020. It was \*\*\* percentage points lower in interim 2023 than in interim 2022. Overall, the market share of U.S. shipments of subject sources, by value, increased in each year during 2020-22, most notably from 2021 to 2022, and was higher in interim 2023 than in interim 2022, reaching a period high.

U.S. shipments of imports from Mexico held the largest market share, by value, among individual import sources in during 2020-22. However, it steadily decreased in each year during 2020-22, ending \*\*\* percentage points lower in 2022 than in 2020. It was \*\*\* percentage points lower in interim 2023 than in interim 2022, ending lower than the share held by U.S. shipments of imports from Vietnam, but higher than the shares held by U.S. shipments of imports from China and India.

## Part V: Pricing data

### Factors affecting prices

#### Raw material costs

Paper file folders are made from large rolls of uncoated free sheet paper from paper mills. Other components include metal fasteners, steel rods, glue, Tyvek, and boxes for packaging.<sup>1</sup> Raw materials as a share of cost of goods sold (COGS) \*\*\* from \*\*\* percent in 2020 to \*\*\* percent in 2022.<sup>2</sup> U.S. producer \*\*\* stated that it experienced a \*\*\* increase in the cost of paper raw materials since the third quarter of 2021, and that the cost of metal components and finished goods packaging also increased.<sup>3</sup> It also added that \*\*\*.<sup>4</sup> According to an industry publication, “...large uncoated and coated paper mills in North America continued to take downtime in September” and were expected to in October, with a source adding that downtime was preferable to balance inventories than price reductions for uncoated free sheet.<sup>5</sup>

All three U.S. producers and three of seven responding importers reported that raw material costs had steadily increased since January 1, 2020, while the remaining four importers reported that raw material costs had fluctuated upwards. All three U.S. producers reported that they increased or tried to increase their prices due to raw material cost increases but have had difficulties doing so. Importer/purchaser \*\*\* reported that all of its prices had increased \*\*\*. Importer \*\*\* reported that it had \*\*\*. Importer

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<sup>1</sup> Conference transcript, pp. 89-90 (Roberts, Beckman).

<sup>2</sup> Raw materials as a share of COGS were \*\*\* in January-June 2023 compared to January-June 2022.

<sup>3</sup> Petitioners’ responses to staff questions on October 3, 2023, p. 2.

<sup>4</sup> \*\*\*.

<sup>5</sup> Mercante, Renata, Fastmarkets, “Printing and Writing Paper Destocking in North America Continues to Put Prices Under Downward Pressure”, retrieved October 10, 2023,

<https://www.fastmarkets.com/insights/printing-and-writing-paper-destocking-in-north-america-continues-pricing-pressure>.

\*\*\* reported that unit prices have increased \*\*\*.

## **Transportation costs to the U.S. market**

Transportation costs for paper file folders shipped from subject countries to the United States averaged 12.3 percent for China, 19.3 percent for India, and 15.3 percent for Vietnam. These estimates were derived from official import data and represent the transportation and other charges on imports.<sup>6</sup>

## **U.S. inland transportation costs**

All three U.S. producers and four of five responding importers reported that they typically arrange transportation to their customers. U.S. producer \*\*\* reported that its U.S. inland transportation costs were \*\*\* percent<sup>7</sup> while importers reported costs of \*\*\* percent. Importers/purchasers \*\*\* reported inland transportation costs of \*\*\* percent, respectively.

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<sup>6</sup> The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2022 and then dividing by the customs value based on the HTS statistical reporting number 4820.30.0040.

<sup>7</sup> U.S. producer \*\*\* reported that the majority of its raw materials price quotes from its suppliers are inclusive of the freight cost to its facilities, and \*\*\* reported its inland transportation costs were \*\*\* percent and did not respond to follow-up requests by staff.

## Pricing practices

### Pricing methods

U.S. producers and importers reported setting prices using transaction-by-transaction methods, contracts, and set price lists, while importers additionally reported other price setting methods (table V-1). All three U.S. producers reported using contracts to set prices, while four of six responding importers reported using set price lists, followed by contracts and other methods (reported by three of six responding importers each). Other methods included retail/market comparisons.

**Table V-1**  
**Paper file folders: Count of U.S. producers' and importers' reported price setting methods**

Count in number of firms reporting

<b>Method</b>	<b>U.S. producers</b>	<b>Importers</b>
Transaction-by-transaction	1	2
Contract	3	3
Set price list	1	4
Other	0	3
Responding firms	3	6

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 and importers reported selling the vast majority of their paper file folders under annual contracts (table V-2).

**Table V-2**  
**Paper file folders: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2022**

Share in percent

Type of sale	U.S. producers	Subject importers
Long-term contracts	***	***
Annual contracts	***	***
Short-term contracts	***	***
Spot sales	***	***
Total	100.0	100.0

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

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

Two of three U.S. producers \*\*\* reported renegotiating price in their annual contracts. All three U.S. producers reported fixed prices and that their contract provisions were not indexed to raw materials. Most responding importers reported that the typical contract provisions were not applicable to their firms. Of the two responding importers that did indicate contract provisions for annual contracts, one reported renegotiating price while the other did not, and both reported that their contracts were not indexed to raw materials.

Four of six responding purchasers reported that they purchase product weekly and one purchaser each reported purchasing daily \*\*\* and annually \*\*\*. All six responding purchasers reported that their purchasing frequency had not changed since 2020. Two purchasers reported contacting between two and four suppliers before making a purchase, while one purchaser \*\*\* reported contacting between one and seven suppliers and another \*\*\* reported contacting between five and eight suppliers.

### **Sales terms and discounts**

Two of three U.S. producers reported quoting prices on a delivered basis while three of four responding importers reported quoting prices on an f.o.b. basis. One U.S. producer, \*\*\*, reported offering quantity discounts while two producers \*\*\* reported no discount policy. Importer \*\*\* reported offering quantity discounts and coupons and \*\*\* reported offering no discount policy.

## **Price leadership**

Purchasers reported that there were no price leaders in the paper file folders market. \*\*\* reported that Staples, Office Depot, and Essendant were price leaders, while \*\*\* reported that Three-Color Stone, Navneet, and Guangbo were price leaders, and \*\*\* reported that U Brands was a price leader. Purchasers indicating the presence of price leaders indicated that these price leaders led by lower pricing in the marketplace, responding reasonably to reductions or increases in raw material costs, and knowledge of market and retail trends and communicating shifts preemptively.

## Price and purchase cost 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 products shipped to unrelated U.S. customers during January 2020 - June 2023. Products 1-5 are manila folders of various package sizes, product 6 is a hanging folder, and product 7 is a fastener folder. Firms that imported these products from China, India, Vietnam, and/or Mexico for own use/retail sale were also requested to provide import purchase cost data.

**Product 1.**-- Packages of up to 25 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).



**Product 2.**-- Boxes of 75 to 99 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).



**Product 3.**-- Boxes of 100 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).





**Product 4.**-- Boxes of 125 to 150 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).



**Product 5.**-- Boxes of 250 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).



**Product 6.**-- Boxes of 20 to 25 hanging file folders, standard green color, letter size, made from uncoated freesheet paperboard, 11 points thickness, 126 to 144 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), metal rod with small indentations or hooks on the end, and the ends of the rods coated. The box also contains the same number of plastic tabs, each of which is 1/5 cut size, and white paper inserts as the box size.



**Product 7.**-- Boxes of up to 50 fastener folders, manila color, letter size, two embedded and stamped 2 inch fasteners, made from uncoated freesheet paperboard, 11 points thickness, 118 to 128 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended reinforced paper tab on the back flap visible above the height of the front flap and one 1/3 reinforced tab in one of three positions (left, center, right).



## Price data

Three U.S. producers and \*\*\* provided pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.<sup>8</sup>

Price data for products 1-7 are presented in tables V-3 to V-9 and figures V-1 to V-7. Nonsubject country prices are presented in Appendix G.

**Table V-3**

**Paper file folders: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by quarter, January 2020 – June 2023**

Price in dollars per 1,000 folders, quantity in 1,000 folders, margins in percent

Period	US price	US quantity
2020 Q1	***	***
2020 Q2	***	***
2020 Q3	***	***
2020 Q4	***	***
2021 Q1	***	***
2021 Q2	***	***
2021 Q3	***	***
2021 Q4	***	***
2022 Q1	***	***
2022 Q2	***	***
2022 Q3	***	***
2022 Q4	***	***
2023 Q1	***	***
2023 Q2	***	***

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

Note: Product 1: Packages of up to 25 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: No pricing data were received for imports from \*\*\* for Product 1.

<sup>8</sup> 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. \*\*\*. \*\*\*.

**Table V-4**

**Paper file folders: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by quarter, January 2020 – June 2023**

Price in dollars per 1,000 folders, quantity in 1,000 folders, margins in percent

<b>Period</b>	<b>US price</b>	<b>US quantity</b>
2020 Q1	***	***
2020 Q2	***	***
2020 Q3	***	***
2020 Q4	***	***
2021 Q1	***	***
2021 Q2	***	***
2021 Q3	***	***
2021 Q4	***	***
2022 Q1	***	***
2022 Q2	***	***
2022 Q3	***	***
2022 Q4	***	***
2023 Q1	***	***
2023 Q2	***	***

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

Note: Product 2: Boxes of 75 to 99 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: No pricing data were received for imports from \*\*\* for Product 2.

**Table V-5**

**Paper file folders: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by quarter, January 2020 – June 2023**

Price in dollars per 1,000 folders, quantity in 1,000 folders, margins in percent

<b>Period</b>	<b>US price</b>	<b>US quantity</b>
2020 Q1	***	***
2020 Q2	***	***
2020 Q3	***	***
2020 Q4	***	***
2021 Q1	***	***
2021 Q2	***	***
2021 Q3	***	***
2021 Q4	***	***
2022 Q1	***	***
2022 Q2	***	***
2022 Q3	***	***
2022 Q4	***	***
2023 Q1	***	***
2023 Q2	***	***

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

Note: Product 3: Boxes of 100 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: No pricing data were received for imports from \*\*\* for Product 3.

**Table V-6****Paper file folders: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by quarter, January 2020 – June 2023**

Price in dollars per 1,000 folders, quantity in 1,000 folders, margins in percent

<b>Period</b>	<b>US price</b>	<b>US quantity</b>
2020 Q1	***	***
2020 Q2	***	***
2020 Q3	***	***
2020 Q4	***	***
2021 Q1	***	***
2021 Q2	***	***
2021 Q3	***	***
2021 Q4	***	***
2022 Q1	***	***
2022 Q2	***	***
2022 Q3	***	***
2022 Q4	***	***
2023 Q1	***	***
2023 Q2	***	***

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

Note: Product 4: Boxes of 125 to 150 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: No pricing data were received for imports from \*\*\* for Product 4.

**Table V-7****Paper file folders: Weighted-average f.o.b. prices and quantities of domestic and imported product 5 and margins of underselling/(overselling), by quarter, January 2020 – June 2023**

Price in dollars per 1,000 folders, quantity in 1,000 folders, margins in percent

Period	US price	US quantity
2020 Q1	***	***
2020 Q2	***	***
2020 Q3	***	***
2020 Q4	***	***
2021 Q1	***	***
2021 Q2	***	***
2021 Q3	***	***
2021 Q4	***	***
2022 Q1	***	***
2022 Q2	***	***
2022 Q3	***	***
2022 Q4	***	***
2023 Q1	***	***
2023 Q2	***	***

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

Note: Product 5: Boxes of 250 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: No pricing data were received for imports from \*\*\* for Product 5.

**Table V-8****Paper file folders: Weighted-average f.o.b. prices and quantities of domestic and imported product 6 and margins of underselling/(overselling), by quarter, January 2020 – June 2023**

Price in dollars per 1,000 folders, quantity in 1,000 folders, margins in percent

Period	US price	US quantity
2020 Q1	***	***
2020 Q2	***	***
2020 Q3	***	***
2020 Q4	***	***
2021 Q1	***	***
2021 Q2	***	***
2021 Q3	***	***
2021 Q4	***	***
2022 Q1	***	***
2022 Q2	***	***
2022 Q3	***	***
2022 Q4	***	***
2023 Q1	***	***
2023 Q2	***	***

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

Note: Product 6: Boxes of 20 to 25 hanging file folders, standard green color, letter size, made from uncoated freesheet paperboard, 11 points thickness, 126 to 144 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), metal rod with small indentations or hooks on the end, and the ends of the rods coated. The box also contains the same number of plastic tabs, each of which is 1/5 cut size, and white paper inserts as the box size.

Note: No pricing data were received for imports from \*\*\* for Product 6.

**Table V-9****Paper file folders: Weighted-average f.o.b. prices and quantities of domestic and imported product 7 and margins of underselling/(overselling), by quarter, January 2020 – June 2023**

Price in dollars per 1,000 folders, quantity in 1,000 folders, margins in percent

Period	US price	US quantity
2020 Q1	***	***
2020 Q2	***	***
2020 Q3	***	***
2020 Q4	***	***
2021 Q1	***	***
2021 Q2	***	***
2021 Q3	***	***
2021 Q4	***	***
2022 Q1	***	***
2022 Q2	***	***
2022 Q3	***	***
2022 Q4	***	***
2023 Q1	***	***
2023 Q2	***	***

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

Note: Product 7: Boxes of up to 50 fastener folders, manila color, letter size, two embedded and stamped 2 inch fasteners, made from uncoated freesheet paperboard, 11 points thickness, 118 to 128 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended reinforced paper tab on the back flap visible above the height of the front flap and one 1/3 reinforced tab in one of three positions (left, center, right).

Note: No pricing data were received for imports from \*\*\* for Product 7.



**Figure V-1**  
**Paper file folders: Weighted-average prices and quantities of domestic and imported product 1, by quarter, January 2020 – June 2023**

\* \* \* \* \*

\* \* \* \* \*

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

Note: Product 1: Packages of up to 25 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: No pricing data were received for imports from \*\*\* for Product 1.

**Figure V-2**  
**Paper file folders: Weighted-average prices and quantities of domestic and imported product 2, by quarter, January 2020 – June 2023**

\* \* \* \* \*

\* \* \* \* \*

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

Note: Product 2: Boxes of 75 to 99 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: No pricing data were received for imports from \*\*\* for Product 2.

**Figure V-3**  
**Paper file folders: Weighted-average prices and quantities of domestic and imported product 3, by quarter, January 2020 – June 2023**

\* \* \* \* \*

\* \* \* \* \*

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

Note: Product 3: Boxes of 100 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: No pricing data were received for imports from \*\*\* for Product 3.

**Figure V-4**  
**Paper file folders: Weighted-average prices and quantities of domestic and imported product 4, by quarter, January 2020 – June 2023**

\* \* \* \* \*

\* \* \* \* \*

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

Note: Product 4: Boxes of 125 to 150 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: No pricing data were received for imports from \*\*\* for Product 4.

**Figure V-5**  
**Paper file folders: Weighted-average prices and quantities of domestic and imported product 5, by quarter, January 2020 – June 2023**

\* \* \* \* \*

\* \* \* \* \*

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

Note: Product 5: Boxes of 250 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: No pricing data were received for imports from \*\*\* for Product 5.

**Figure V-6**  
**Paper file folders: Weighted-average prices and quantities of domestic and imported product 6, by quarter, January 2020 – June 2023**

\* \* \* \* \*

\* \* \* \* \*

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

Note: Product 6: Boxes of 20 to 25 hanging file folders, standard green color, letter size, made from uncoated freesheet paperboard, 11 points thickness, 126 to 144 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), metal rod with small indentations or hooks on the end, and the ends of the rods coated. The box also contains the same number of plastic tabs, each of which is 1/5 cut size, and white paper inserts as the box size.

Note: No pricing data were received for imports from \*\*\* for Product 6.

**Figure V-7**  
**Paper file folders: Weighted-average prices and quantities of domestic and imported product 7, by quarter, January 2020 – June 2023**

\* \* \* \* \*

\* \* \* \* \*

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

Note: Product 7: Boxes of up to 50 fastener folders, manila color, letter size, two embedded and stamped 2 inch fasteners, made from uncoated freesheet paperboard, 11 points thickness, 118 to 128 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended reinforced paper tab on the back flap visible above the height of the front flap and one 1/3 reinforced tab in one of three positions (left, center, right).

Note: No pricing data were received for imports from \*\*\* for Product 7.

## Import purchase cost data

Four importers reported import purchase cost data for products 1-7: \*\*\*. Purchase cost data reported by these firms accounted for \*\*\* percent of imports from India, \*\*\* percent of imports from Vietnam, and \*\*\* percent of imports from Mexico in 2022. The largest importers for retail sale were \*\*\*. Landed duty-paid (LDP) purchase cost data for imports from China, India, and Vietnam are presented in tables V-10 to V-16, along with U.S. producers' sales prices.<sup>9</sup>

Importers reporting import purchase cost data were asked to provide additional information regarding the costs and benefits of directly importing paper file folders. \*\*\* reported that they were mostly cost related; \*\*\* reported that producers could not produce the volumes required or quality, resulting in continued stock-out and quality issues and an inability to grow its catalog; \*\*\* reported price, delivery capabilities, greater control of product development, and supply chain process and cost efficiency; \*\*\* reported supplementing its U.S. production; and \*\*\* reported cost, quality, chain of custody compliance on sustainability requirements.

Three of four importers reported that they incurred additional costs beyond landed duty-paid costs by importing paper file folders themselves rather than purchasing from a U.S. producer or U.S. importer. Of these, two importers estimated the total additional cost incurred; both estimates were \*\*\* percent compared to the landed duty-paid value. Firms were also asked to identify specific additional costs they incurred as a result of importing paper file folders. Reported costs include keeping enough inventory to cover lead time, requiring carry costs, freight, and warehousing, demurrage, detention, bobtail fees, and transload fees.

Firms were also asked to describe how these additional costs incurred by importing paper file folders themselves compares with additional costs incurred when purchasing from a U.S. producer or U.S. importer. \*\*\* reported that domestic shipments include all costs to deliver to distribution centers in its quotation. \*\*\* reported that shorter lead times allow for lower stock levels, leading to lower carrying costs, and that the difference in stock is 1 month for a domestic producer versus 4-5 months for a foreign producer.

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<sup>9</sup> LDP import value does not include any potential additional costs that a purchaser may incur by importing rather than purchasing from another importer or U.S. producer. Price-cost differentials are based on LDP import values whereas margins of underselling/overselling are based on importer sales prices.



Four responding importers reported that they compare costs of importing to the cost of purchasing from a U.S. producer in determining whether to import paper file folders, four responding importers compare costs to purchasing from a U.S. importer, and one \*\*\* does not compare costs of purchasing from either U.S. producers or importers.

Three firms reported that the import costs (excluding additional costs) of paper file folders they imported are lower than the price of purchasing paper file folders from a U.S. producer or importer, while 4 reported that the import costs are lower including the additional import costs.

Four importers estimated that they saved between \*\*\* percent of the purchase price by importing paper file folders rather than purchasing from a U.S. importer, and two importers reported saving \*\*\* percent compared to purchasing the product from a U.S. producer.<sup>10</sup>

**Table V-10**  
**Paper file folders: Import landed duty-paid purchase costs and domestic prices, and quantities of product 1, and price-cost differentials, by quarter, January 2020 – June 2023**

Quantity in 1,000 folders; Prices and unit LDP values in dollars per 1,000 folders; Price-cost differentials in percent

Period	US price	US quantity	India unit LDP value	India quantity	India price-cost differential
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***

Table continued.

<sup>10</sup> Two firms reported that they based their estimates on previous company transactions, none reported basing their estimates on market research, and 4 reported other bases for their estimates, including direct quotes from U.S. producers/Requests for Proposal (RFP)/annual bid processes.

**Table V-10 Continued**

**Paper file folders: Import landed duty-paid purchase costs and domestic prices, and quantities of product 1, and price-cost differentials, by quarter, January 2020 – June 2023**

Quantity in 1,000 folders; Prices and unit LDP values in dollars per 1,000 folders; Price-cost differentials in percent

Period	US price	US quantity	Vietnam unit LDP value	Vietnam quantity	Vietnam price-cost differential	Subject sources unit LDP value	Subject sources quantity	Subject sources price-cost differential
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***

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

Note: Product 1: Packages of up to 25 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: U.S. producer price data are the same as those presented in table V-3.

Note: No purchase cost data were received for imports from \*\*\* for Product 1. Reported quantities for subject sources are from purchase cost data.

Note: \*\*\*.

Note: \*\*\*.

**Table V-11****Paper file folders: Import landed duty-paid purchase costs and domestic prices, and quantities of product 2, and price-cost differentials, by quarter, January 2020 – June 2023**

Quantity in 1,000 folders; Prices and unit LDP values in dollars per 1,000 folders; Price-cost differentials in percent

Period	US price	US quantity	India unit LDP value	India quantity	India price-cost differential
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***

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

Note: Product 2: Boxes of 75 to 99 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: U.S. producer price data are the same as those presented in table V-4. Reported quantities for subject sources are from purchase cost data.

Note: No purchase cost data were received for imports from \*\*\* for Product 2.

**Table V-12****Paper file folders: Import landed duty-paid purchase costs and domestic prices, and quantities of product 3, and price-cost differentials, by quarter, January 2020 – June 2023**

Quantity in 1,000 folders; Prices and unit LDP values in dollars per 1,000 folders; Price-cost differentials in percent

<b>Period</b>	<b>US price</b>	<b>US quantity</b>	<b>China unit LDP value</b>	<b>China quantity</b>	<b>China price-cost differential</b>	<b>India unit LDP value</b>	<b>India quantity</b>	<b>India price-cost differential</b>
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***

Table continued.

**Table V-12 Continued**

**Paper file folders: Import landed duty-paid purchase costs and domestic prices, and quantities of product 3, and price-cost differentials, by quarter, January 2020 – June 2023**

Quantity in 1,000 folders; Prices and unit LDP values in dollars per 1,000 folders; Price-cost differentials in percent

Period	U.S. price	U.S. quantity	Vietnam unit LDP value	Vietnam quantity	Vietnam price-cost differential	Subject sources unit LDP value	Subject sources quantity	Subject sources price-cost differential
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***

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

Note: Product 3: Boxes of 100 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: U.S. producer price data are the same as those presented in table V-5. Reported quantities for subject sources are from purchase cost data.

**Table V-13****Paper file folders: Import landed duty-paid purchase costs and domestic prices, and quantities of product 4, and price-cost differentials, by quarter, January 2020 – June 2023**

Quantity in 1,000 folders; Prices and unit LDP values in dollars per 1,000 folders; Price-cost differentials in percent

Period	U.S. price	U.S. quantity	India unit LDP value	India quantity	India price-cost differential
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***

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

Note: Product 4: Boxes of 125 to 150 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: U.S. producer price data are the same as those presented in table V-6. Reported quantities for subject sources are from purchase cost data.

Note: No purchase cost data were received for imports from \*\*\* for Product 4.

**Table V-14****Paper file folders: Import landed duty-paid purchase costs and domestic prices, and quantities of product 5, and price-cost differentials, by quarter, January 2020 – June 2023**

Quantity in 1,000 folders; Prices and unit LDP values in dollars per 1,000 folders; Price-cost differentials in percent

<b>Period</b>	<b>US price</b>	<b>US quantity</b>	<b>India unit LDP value</b>	<b>India quantity</b>	<b>India price-cost differential</b>
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***

Table continued.

**Table V-14 Continued**

**Paper file folders: Import landed duty-paid purchase costs and domestic prices, and quantities of product 5, and price-cost differentials, by quarter, January 2020 – June 2023**

Quantity in 1,000 folders; Prices and unit LDP values in dollars per 1,000 folders; Price-cost differentials in percent

Period	U.S. price	U.S. quantity	Vietnam unit LDP value	Vietnam quantity	Vietnam price-cost differential	Subject sources unit LDP value	Subject sources quantity	Subject sources price-cost differential
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***

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

Note: Product 5: Boxes of 250 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: U.S. producer price data are the same as those presented in table V-7. Reported quantities for subject sources are from purchase cost data.

Note: No purchase cost data were received for imports from \*\*\* for Product 5.



**Table V-15****Paper file folders: Import landed duty-paid purchase costs and domestic prices, and quantities of product 6, and price-cost differentials, by quarter, January 2020 – June 2023**

Quantity in 1,000 folders; Prices and unit LDP values in dollars per 1,000 folders; Price-cost differentials in percent

<b>Period</b>	<b>US price</b>	<b>US quantity</b>	<b>India unit LDP value</b>	<b>India quantity</b>	<b>India price-cost differential</b>
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***

Table continued.

**Table V-15 Continued**

**Paper file folders: Import landed duty-paid purchase costs and domestic prices, and quantities of product 6, and price-cost differentials, by quarter, January 2020 – June 2023**

Quantity in 1,000 folders; Prices and unit LDP values in dollars per 1,000 folders; Price-cost differentials in percent

Period	U.S. price	U.S. quantity	Vietnam unit LDP value	Vietnam quantity	Vietnam price-cost differential	Subject sources unit LDP value	Subject sources quantity	Subject sources price-cost differential
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***

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

Note: Product 6: Boxes of 20 to 25 hanging file folders, standard green color, letter size, made from uncoated freesheet paperboard, 11 points thickness, 126 to 144 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), metal rod with small indentations or hooks on the end, and the ends of the rods coated. The box also contains the same number of plastic tabs, each of which is 1/5 cut size, and white paper inserts as the box size.

Note: U.S. producer price data are the same as those presented in table V-8. Reported quantities for subject sources are from purchase cost data.

Note: No purchase cost data were received for imports from \*\*\* for Product 6.

Note: \*\*\*.

**Table V-16****Paper file folders: Import landed duty-paid purchase costs and domestic prices, and quantities of product 7, and price-cost differentials, by quarter, January 2020 – June 2023**

Quantity in 1,000 folders; Prices and unit LDP values in dollars per 1,000 folders; Price-cost differentials in percent

Period	US price	US quantity	China unit LDP value	China quantity	China price-cost differential
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***

Table continued.

**Table V-16 Continued**

**Paper file folders: Import landed duty-paid purchase costs and domestic prices, and quantities of product 7, and price-cost differentials, by quarter, January 2020 – June 2023**

Quantity in 1,000 folders; Prices and unit LDP values in dollars per 1,000 folders; Price-cost differentials in percent

Period	U.S. price	U.S. quantity	Vietnam unit LDP value	Vietnam quantity	Vietnam price-cost differential	Subject sources unit LDP value	Subject sources quantity	Subject sources price-cost differential
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***

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

Note: Product 7: Boxes of up to 50 fastener folders, manila color, letter size, two embedded and stamped 2 inch fasteners, made from uncoated freesheet paperboard, 11 points thickness, 118 to 128 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended reinforced paper tab on the back flap visible above the height of the front flap and one 1/3 reinforced tab in one of three positions (left, center, right).

Note: U.S. producer price data are the same as those presented in table V-9. Reported quantities for subject sources are from purchase cost data.

Note: No purchase cost data were received for imports from \*\*\* for Product 7.

Note: \*\*\*.

**Figure V-8**  
**Paper file folders: U.S. producer prices and import purchase costs, and quantities, of product 1 by quarter, January 2020 – June 2023**

\* \* \* \* \*

\* \* \* \* \*

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

Note: Product 1: Packages of up to 25 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right). U.S. producer price data are the same as those presented in figure V-1.

Note: No purchase cost data were received for imports from \*\*\* for Product 1.

**Figure V-9**  
**Paper file folders: U.S. producer prices and import purchase costs, and quantities, of product 2 by quarter, January 2020 – June 2023**

\* \* \* \* \*

\* \* \* \* \*

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

Note: Product 2: Boxes of 75 to 99 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right). U.S. producer price data are the same as those presented in figure V-2.

Note: No purchase cost data were received for imports from \*\*\* for Product 2.

**Figure V-10**

**Paper file folders: U.S. producer prices and import purchase costs, and quantities, of product 3 by quarter, January 2020 – June 2023**

\* \* \* \* \*

\* \* \* \* \*

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

Note: Product 3: Boxes of 100 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right). U.S. producer price data are the same as those presented in figure V-3.

**Figure V-11**

**Paper file folders: U.S. producer prices and import purchase costs, and quantities, of product 4 by quarter, January 2020 – June 2023**

\* \* \* \* \*

\* \* \* \* \*

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

Note: Product 4: Boxes of 125 to 150 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right). U.S. producer price data are the same as those presented in table V-6.

Note: No purchase cost data were received for imports from \*\*\* for Product 4.



**Figure V-12**

**Paper file folders: U.S. producer prices and import purchase costs, and quantities, of product 5 by quarter, January 2020 – June 2023**

\* \* \* \* \*

\* \* \* \* \*

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

Note: Product 5: Boxes of 250 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right). U.S. producer price data are the same as those presented in figure V-5.

Note: No purchase cost data were received for imports from \*\*\* for Product 5.

**Figure V-13**

**Paper file folders: U.S. producer prices and import purchase costs, and quantities, of product 6 by quarter, January 2020 – June 2023**

\* \* \* \* \*

\* \* \* \* \*

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

Note: Product 6: Boxes of 20 to 25 hanging file folders, standard green color, letter size, made from uncoated freesheet paperboard, 11 points thickness, 126 to 144 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), metal rod with small indentations or hooks on the end, and the ends of the rods coated. The box also contains the same number of plastic tabs, each of which is 1/5 cut size, and white paper inserts as the box size. U.S. producer price data are the same as those presented in table V-8.

Note: No purchase cost data were received for imports from \*\*\* for Product 6.

**Figure V-14**

**Paper file folders: U.S. producer prices and import purchase costs, and quantities, of product 7 by quarter, January 2020 – June 2023**

\* \* \* \* \*

\* \* \* \* \*

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

Note: Product 7: Boxes of up to 50 fastener folders, manila color, letter size, two embedded and stamped 2 inch fasteners, made from uncoated freesheet paperboard, 11 points thickness, 118 to 128 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended reinforced paper tab on the back flap visible above the height of the front flap and one 1/3 reinforced tab in one of three positions (left, center, right). U.S. producer price data are the same as those presented in figure V-7.

Note: No purchase cost data were received for imports from \*\*\* for Product 7.

## **Price and purchase cost trends**

In general, prices and purchase costs increased during January 2020 – June 2023. U.S. prices comparatively fell in the second quarters of 2020 and 2021, but still ended higher in June 2023 than in January 2020. This was especially pronounced for Product 1, which experienced the largest price increases throughout the period relative to its original prices. There were too few quarters of prices and purchase costs to calculate trends for imported pricing products.

**Table V-17**  
**Paper file folders: Summary of price data, by product and source, January 2020 – June 2023**

Prices in dollars per 1,000 folders; Quantity in 1,000 folders; Change in percent

Product	Source	Number of quarters	Quantity	Low price	High price	First quarter price	Last quarter price	Change over period
Product 1	United States	***	***	***	***	***	***	***
Product 1	China	***	***	***	***	***	***	***
Product 1	India	***	***	***	***	***	***	***
Product 1	Vietnam	***	***	***	***	***	***	***
Product 2	United States	***	***	***	***	***	***	***
Product 2	China	***	***	***	***	***	***	***
Product 2	India	***	***	***	***	***	***	***
Product 2	Vietnam	***	***	***	***	***	***	***
Product 3	United States	***	***	***	***	***	***	***
Product 3	China	***	***	***	***	***	***	***
Product 3	India	***	***	***	***	***	***	***
Product 3	Vietnam	***	***	***	***	***	***	***
Product 4	United States	***	***	***	***	***	***	***
Product 4	China	***	***	***	***	***	***	***
Product 4	India	***	***	***	***	***	***	***
Product 4	Vietnam	***	***	***	***	***	***	***
Product 5	United States	***	***	***	***	***	***	***
Product 5	China	***	***	***	***	***	***	***
Product 5	India	***	***	***	***	***	***	***
Product 5	Vietnam	***	***	***	***	***	***	***
Product 6	United States	***	***	***	***	***	***	***
Product 6	China	***	***	***	***	***	***	***
Product 6	India	***	***	***	***	***	***	***
Product 6	Vietnam	***	***	***	***	***	***	***
Product 7	United States	***	***	***	***	***	***	***
Product 7	China	***	***	***	***	***	***	***
Product 7	India	***	***	***	***	***	***	***
Product 7	Vietnam	***	***	***	***	***	***	***

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. Percent change is the change from the first quarter to the last quarter of the data collection period.

**Table V-18**

**Paper file folders: Summary of purchase cost data, by product and source, January 2020 – June 2023**

Prices and unit LDP values in dollars per 1,000 folders; Quantity in 1,000 folders; Change in percent

Product	Source	Number of quarters	Quantity	Low price or unit LDP value	High price or unit LDP value	First quarter price or unit LDP value	Last quarter price or unit LDP value	Change over period
Product 1	United States	***	***	***	***	***	***	***
Product 1	China cost	***	***	***	***	***	***	***
Product 1	India cost	***	***	***	***	***	***	***
Product 1	Vietnam cost	***	***	***	***	***	***	***
Product 2	United States	***	***	***	***	***	***	***
Product 2	China cost	***	***	***	***	***	***	***
Product 2	India cost	***	***	***	***	***	***	***
Product 2	Vietnam cost	***	***	***	***	***	***	***
Product 3	United States	***	***	***	***	***	***	***
Product 3	China cost	***	***	***	***	***	***	***
Product 3	India cost	***	***	***	***	***	***	***
Product 3	Vietnam cost	***	***	***	***	***	***	***
Product 4	United States	***	***	***	***	***	***	***
Product 4	China cost	***	***	***	***	***	***	***
Product 4	India cost	***	***	***	***	***	***	***
Product 4	Vietnam cost	***	***	***	***	***	***	***
Product 5	United States	***	***	***	***	***	***	***
Product 5	China cost	***	***	***	***	***	***	***
Product 5	India cost	***	***	***	***	***	***	***
Product 5	Vietnam cost	***	***	***	***	***	***	***
Product 6	United States	***	***	***	***	***	***	***
Product 6	China cost	***	***	***	***	***	***	***
Product 6	India cost	***	***	***	***	***	***	***
Product 6	Vietnam cost	***	***	***	***	***	***	***
Product 7	United States	***	***	***	***	***	***	***
Product 7	China cost	***	***	***	***	***	***	***
Product 7	India cost	***	***	***	***	***	***	***
Product 7	Vietnam cost	***	***	***	***	***	***	***

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

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

## Purchase cost comparisons<sup>11</sup>

### Price-cost comparisons

As shown in table V-19, landed duty-paid costs for paper file folders imported from subject countries were below the sales price for U.S.-produced product in 56 of 89 instances (\*\* folders); price-cost differentials ranged from \*\* percent. In the remaining 33 instances (\*\* folders), landed duty-paid costs for paper file folders from subject countries were between \*\* percent above sales prices for the domestic product.

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<sup>11</sup> \*\*.

**Table V-19****Paper file folders: Comparisons of import purchase costs and U.S.-producer sales prices, by product, January 2020 – June 2023**

Quantity in 1,000 folders; Price-cost differentials in percent

Products	Type	Number of quarters	Quantity	Average differential	Min differential	Max differential
Product 1	Lower than US	12	***	***	***	***
Product 2	Lower than US	---	***	***	***	***
Product 3	Lower than US	13	***	***	***	***
Product 4	Lower than US	3	***	***	***	***
Product 5	Lower than US	8	***	***	***	***
Product 6	Lower than US	12	***	***	***	***
Product 7	Lower than US	8	***	***	***	***
All products	Lower than US	56	677,381	27.9	0.3	69.4
Product 1	Higher than US	2	***	***	***	***
Product 2	Higher than US	---	***	***	***	***
Product 3	Higher than US	8	***	***	***	***
Product 4	Higher than US	---	***	***	***	***
Product 5	Higher than US	4	***	***	***	***
Product 6	Higher than US	13	***	***	***	***
Product 7	Higher than US	6	***	***	***	***
All products	Higher than US	33	47,492	(47.4)	(0.7)	(389.6)

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.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Percent change is the change from the first quarter to the last quarter of the data collection period.



**Table V-20****Paper file folders: Comparisons of import purchase costs and U.S.-producer sales prices, by country, January 2020 – June 2023**

Quantity in 1,000 folders; Price-cost differentials in percent

Sources	Type	Number of quarters	Quantity	Average differential	Min differential	Max differential
China	Lower than US	2	***	***	***	***
India	Lower than US	24	***	***	***	***
Vietnam	Lower than US	30	***	***	***	***
All subject sources	Lower than US	56	677,381	27.9	0.3	69.4
China	Higher than US	1	***	***	***	***
India	Higher than US	14	***	***	***	***
Vietnam	Higher than US	18	***	***	***	***
All subject sources	Higher than US	33	47,492	(47.4)	(0.7)	(389.6)

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.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Percent change is the change from the first quarter to the last quarter of the data collection period.

**Table V-21**  
**Paper file folders: Comparisons of import purchase costs and U.S.-producer sales prices, by period, January 2020 – June 2023**

Period	Type	Number of quarters	Quantity	Average differential	MIn differential	Max differential
2020	Lower than US	7	***	***	***	***
2021	Lower than US	2	***	***	***	***
2022	Lower than US	29	***	***	***	***
Jan-June 2023	Lower than US	18	***	***	***	***
All periods	Lower than US	56	677,381	27.9	0.3	69.4
2020	Higher than US	10	***	***	***	***
2021	Higher than US	19	***	***	***	***
2022	Higher than US	4	***	***	***	***
Jan-June 2023	Higher than US	---	***	***	***	***
All products	Higher than US	33	47,492	(47.4)	(0.7)	(389.6)

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

## Lost sales and lost revenue

In the preliminary phase of the investigation, the Commission requested that U.S. producers of paper file folders report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of paper file folders from China, India, and Vietnam during January 2019 - June 2022. One U.S. producer, \*\*\*, submitted lost sales and lost revenue allegations, identifying two firms with which they lost sales. U.S. producer \*\*\* alleged that it \*\*\*.<sup>12</sup>

In the final phase of the investigation, of the three responding U.S. producers, two reported that they had to reduce prices and that they had lost sales.

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<sup>12</sup> \*\*\*, \*\*\*.

Staff contacted 13 purchasers and received responses from 7 purchasers. Responding purchasers reported purchasing \*\*\* paper file folders during January 2020 – June 2023 (reported purchases and imports are detailed in table V-22).

Of the seven responding purchasers, five reported that, since 2020, they had purchased imported paper file folders from subject countries instead of U.S.-produced product; four had purchased from China instead, three had purchased from India instead, and three had purchased from Vietnam instead. All four of these purchasers reported that subject import prices were lower than U.S.-produced product. Of these, two purchasers reported that price was a primary reason for the decision to purchase product imported from India, one purchaser for the decision to purchase product imported from China, and one for the decision to purchase product imported from Vietnam rather than U.S.-produced product. Three purchasers estimated the quantity of paper file folders from subject countries purchased instead of domestic product; \*\*\* (table V-24). Purchasers identified challenges with supply leading to growth in imported product as a non-price reason for purchasing imported rather than U.S.-produced product.

Of the seven responding purchasers, none reported that U.S. producers had reduced prices in order to compete with lower-priced imports from China, India, and Vietnam; four reported that they did not know and three reported that U.S. producers had not reduced prices in order to compete.

**Table V-22**  
**Paper file folders: Purchasers’ reported purchases and imports, by firm and source**

Quantity in 1,000 folders; change in shares in percentage points

Purchaser	Domestic quantity	Subject quantity	All other quantity	Change in domestic share	Change in subject country 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.

**Table V-23****Paper file folders: Purchasers' responses to purchasing subject imports instead of domestic product, by firm**

Quantity in 1,000 folders

Purchaser	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Explanation
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All purchasers	Yes--5; No--2	Yes--4; No--1	Yes--2; No--0	***	NA

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

**Table V-24****Paper file folders: Purchasers' responses to purchasing subject imports instead of domestic product, by source**

Quantity in 1,000 folders

Source	Count of purchasers reporting subject imports instead of domestic	Count of purchasers reported that imports were priced lower	Count of purchasers reporting that price was a primary reason for shift	Quantity
China	4	3	1	***
India	3	3	2	***
Vietnam	3	3	1	***
Subject sources	5	4	2	***

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

\*\*\* provided additional details on its purchases during the period of investigation. It reported that since 2019, it \*\*\*. It continued that \*\*\*. It added that \*\*\*. It stated that \*\*\*. \*\*\*.<sup>13</sup> It added that \*\*\*.

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<sup>13</sup> Petitioners' posthearing brief, Exh. 1, pp. 1-2, Exh. 2, pp. 1-2, and Attachment to Exh. 2, p. 1.

Respondent Staples reported that \*\*\*.<sup>14</sup>

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<sup>14</sup> Affidavit of Brad Young, Vice President of Product Development, Global Sourcing, Manufacturing & Operations, Staples, Inc., Respondents Staples, Navneet, TCS, and Thrasio's postconference brief, Exhibit 2, at 8-10, and 12.

# Part VI: Financial experience of U.S. producers

## Background<sup>1</sup>

Three U.S. producers (BSP Filing, Smead, and TOPS) provided usable financial results on their paper file folder operations.<sup>2</sup> All three U.S. producers reported financial data on a calendar year basis and on the basis of GAAP.<sup>3</sup>

Figure VI-1 presents each responding firm's share of the total reported net sales quantity in 2022. Net sales consisted primarily of commercial sales, with \*\*\* U.S. producer (\*\*\*) reporting internal consumption for all five periods for which data were collected.<sup>4</sup> Non-commercial sales are included but not presented separately in this section of the report.

Staff conducted a verification of TOPS' U.S. producer questionnaire. The verification adjustments were incorporated into this report.<sup>5</sup>

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<sup>1</sup> The following abbreviations are used in the tables and/or text of this section: generally accepted accounting principles ("GAAP"), fiscal year ("FY"), net sales ("NS"), cost of goods sold ("COGS"), selling, general, and administrative expenses ("SG&A expenses"), average unit values ("AUVs"), research and development expenses ("R&D expenses"), return on assets ("ROA"), January 2020 to June 2023 ("period examined"), January to June 2022 ("interim 2022"), January to June 2023 ("interim 2023").

<sup>2</sup> Smead and TOPS (petitioning coalition) both are privately-held companies and estimated to account for 90 percent of U.S. production of paper file folders. Petition, p. 5 and exh. I-1.

The Commission received a third U.S. producer questionnaire response from BSP Filing (a small family-owned business that started in April 1984). BSP Filing webpage, <https://bspfiling.com/about-us>, retrieved August 29, 2023. BSP Filing is \*\*\*. Responses from BSP Filing to staff questions, September 6-7, 2023.

BSP Filing's 2020 financial data are \*\*\*. BSP Filing's net sales volume and value were less than \*\*\* percent of the aggregated U.S. industry in 2022. As a result of \*\*\*.

<sup>3</sup> All three firms reported fiscal years that end on December 31<sup>st</sup>.

<sup>4</sup> From 2020 to June 2023, \*\*\*.

<sup>5</sup> Verification resulted in small adjustments to TOPS' U.S. producer questionnaire response impacting a number of data points in both parts II and III of its questionnaire response. As a result, TOPS' gross, operating, and net profits changed by \*\*\* percent or less in 2020, 2021, 2022, and interim 2023. Adjustments from verification resulted in larger percent changes in interim 2022 profits measures: gross profit increased by \*\*\* percent (from adjustments to raw materials and direct labor); operating profit declined by \*\*\* percent (from adjustment to SG&A expenses); and net income declined by \*\*\* percent (from adjustment to interest expense). TOPS verification report, October 20, 2023.

**Figure VI-1**  
**Paper file folders: U.S. producers' share of net sales quantity in 2022, by firm**

\* \* \* \* \*

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

## **Operations on paper file folders**

Table VI-1 presents aggregated data on U.S. producers' operations in relation to paper file folders, while table VI-2 presents corresponding changes in AUVs. Table VI-3 presents selected company-specific financial data.



**Table VI-1**  
**Paper file folders: U.S. producers' results of operations, by item and period**

Quantity in 1,000 folders; value in 1,000 dollars; ratios in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Uncoated free sheet cost	Value	***	***	***	***	***
COGS: Paperboard cost	Value	***	***	***	***	***
COGS: Metal or plastic input cost	Value	***	***	***	***	***
COGS: Other input cost	Value	***	***	***	***	***
COGS: All raw materials	Value	***	***	***	***	***
COGS: Direct labor	Value	***	***	***	***	***
COGS: Other factory	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Other expense/(income), net	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Uncoated free sheet cost	Ratio to NS	***	***	***	***	***
COGS: Paperboard cost	Ratio to NS	***	***	***	***	***
COGS: Metal or plastic input cost	Ratio to NS	***	***	***	***	***
COGS: Other input cost	Ratio to NS	***	***	***	***	***
COGS: All raw materials	Ratio to NS	***	***	***	***	***
COGS: Direct labor	Ratio to NS	***	***	***	***	***
COGS: Other factory	Ratio to NS	***	***	***	***	***
COGS: Total	Ratio to NS	***	***	***	***	***
Gross profit	Ratio to NS	***	***	***	***	***
SG&A expense	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table continued.

**Table VI-1 Continued**

**Paper file folders: U.S. producers' results of operations, by item and period**

Shares in percent; unit values in dollars per 1,000 folders; count in number of firms reporting

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
COGS: Uncoated free sheet cost	Share	***	***	***	***	***
COGS: Paperboard cost	Share	***	***	***	***	***
COGS: Metal or plastic input cost	Share	***	***	***	***	***
COGS: Other input cost	Share	***	***	***	***	***
COGS: All raw materials	Share	***	***	***	***	***
COGS: Direct labor	Share	***	***	***	***	***
COGS: Other factory	Share	***	***	***	***	***
COGS: Total	Share	***	***	***	***	***
Total net sales	Unit value	***	***	***	***	***
COGS: Uncoated free sheet cost	Unit value	***	***	***	***	***
COGS: Paperboard cost	Unit value	***	***	***	***	***
COGS: Metal or plastic input cost	Unit value	***	***	***	***	***
COGS: Other input cost	Unit value	***	***	***	***	***
COGS: All raw materials	Unit value	***	***	***	***	***
COGS: Direct labor	Unit value	***	***	***	***	***
COGS: Other factory	Unit value	***	***	***	***	***
COGS: Total	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	***	***	***	***	***

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

Note: Shares represent the share of COGS. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Unit values shown as "0" or "(0)" per 1,000 folders represent non-zero values less than "\$0.50" per 1,000 folders (if positive) and greater than "\$-(0.50)" per 1,000 folders (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Table VI-2**  
**Paper file folders: Changes in AUVs between comparison periods**

Changes in percent

Item	2020-22	2020-21	2021-22	Jan-Jun 2022-23
Total net sales	▲***	▲***	▲***	▲***
COGS: Uncoated free sheet cost	▲***	▲***	▲***	▲***
COGS: Paperboard cost	▲***	▲***	▲***	▲***
COGS: Metal or plastic input cost	▲***	▲***	▲***	▲***
COGS: Other input cost	▲***	▲***	▲***	▲***
COGS: All raw materials	▲***	▲***	▲***	▲***
COGS: Direct labor	▲***	▲***	▲***	▲***
COGS: Other factory	▲***	▲***	▲***	▲***
COGS: Total	▲***	▲***	▲***	▲***

Table continued.

**Table VI-2 Continued**  
**Paper file folders: Changes in AUVs between comparison periods**

Changes in dollars per 1,000 folders

Item	2020-22	2020-21	2021-22	Jan-Jun 2022-23
Total net sales	▲***	▲***	▲***	▲***
COGS: Uncoated free sheet cost	▲***	▲***	▲***	▲***
COGS: Paperboard cost	▲***	▲***	▲***	▲***
COGS: Metal or plastic input cost	▲***	▲***	▲***	▲***
COGS: Other input cost	▲***	▲***	▲***	▲***
COGS: All raw materials	▲***	▲***	▲***	▲***
COGS: Direct labor	▲***	▲***	▲***	▲***
COGS: Other factory	▲***	▲***	▲***	▲***
COGS: Total	▲***	▲***	▲***	▲***
Gross profit or (loss)	▲***	▲***	▲***	▲***
SG&A expense	▲***	▲***	▲***	▲***
Operating income or (loss)	▼***	▼***	▲***	▲***
Net income or (loss)	▼***	▼***	▼***	▲***

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

Note: Unit values shown as “0” represent values greater than zero, but less than “0. 5.” Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

**Table VI-3**  
**Paper file folders: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Net sales quantity**

Quantity in 1,000 folders

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table VI-3 Continued**  
**Paper file folders: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Net sales value**

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table VI-3 Continued**  
**Paper file folders: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**COGS**

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table VI-3 Continued**  
**Paper file folders: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Gross profit or (loss)**

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table VI-3 Continued****Paper file folders: U.S. producers' sales, costs/expenses, and profitability, by firm and period****SG&A expenses**

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table VI-3 Continued****Paper file folders: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Operating income or (loss)**

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table VI-3 Continued****Paper file folders: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Net income or (loss)**

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table VI-3 Continued****Paper file folders: U.S. producers' sales, costs/expenses, and profitability, by firm and period****COGS to net sales ratio**

Ratios in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table VI-3 Continued****Paper file folders: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Gross profit or (loss) to net sales ratio**

Ratios in percent

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table VI-3 Continued****Paper file folders: U.S. producers' sales, costs/expenses, and profitability, by firm and period****SG&A expenses to net sales ratio**

Ratios in percent

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table VI-3 Continued****Paper file folders: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Operating income or (loss) to net sales ratio**

Ratios in percent

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table VI-3 Continued****Paper file folders: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Net income or (loss) to net sales ratio**

Ratios in percent

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table VI-3 Continued****Paper file folders: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit net sales value**

Unit values in dollars per 1,000 folders

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table VI-3 Continued****Paper file folders: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit raw material costs**

Unit values in dollars per 1,000 folders

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table VI-3 Continued****Paper file folders: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit direct labor costs**

Unit values in dollars per 1,000 folders

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table VI-3 Continued****Paper file folders: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit other factory costs**

Unit values in dollars per 1,000 folders

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table VI-3 Continued****Paper file folders: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit COGS**

Unit values in dollars per 1,000 folders

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table VI-3 Continued****Paper file folders: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit gross profit or (loss)**

Unit values in dollars per 1,000 folders

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table VI-3 Continued****Paper file folders: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit SG&A expenses**

Unit values in dollars per 1,000 folders

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table VI-3 Continued****Paper file folders: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit operating income or (loss)**

Unit values in dollars per 1,000 folders

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.



**Table VI-3 Continued**  
**Paper file folders: U.S. producers' sales, costs/expenses, and profitability, by firm and period**  
**Unit net income or (loss)**

Unit values in dollars per 1,000 folders

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

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

Note: Shares represent the share of COGS. Shares and ratios shown as "0.0" or "(0.0)" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Unit values shown as "0" or "(0)" per 1,000 folders represent non-zero values less than "\$0.50" per 1,000 folders (if positive) and greater than "\$-(0.50)" per 1,000 folders (if negative). Zeroes null values, and undefined calculations are suppressed and shown as "---".

## Net sales

As presented in table VI-1, total net sales quantity irregularly decreased while net sales value irregularly increased from 2020 to 2022; interim 2023 net sales quantity and value were both lower than in interim 2022. The decrease by quantity indicates that U.S. producers sold less paper file folders but at higher prices, with the highest net sales AUV occurring in interim 2023.

Table VI-3 shows that both Smead and TOPS, representing the vast majority of sales, experienced the same directional trends of net sales quantity and value during the full year periods (increasing from 2020 to 2021 before declining from 2021 to 2022, resulting in an overall decline in net sales quantity but an overall increase in net sales value from 2020 to 2022). Net sales quantities were lower in interim 2023 than in interim 2022 for both companies while value trends in interim 2023 varied; \*\*\*. Although net sales AUVs ranged widely between Smead and TOPS, both producers reported \*\*\* increases in net sales AUVs from 2020 to 2022, and for interim 2023 compared to interim 2022.<sup>6 7</sup> Differences in net sales

<sup>6</sup> TOPS \*\*\*. Responses from TOPS to staff questions, November 9, 2022 and August 4, 2023.

<sup>7</sup> Smead reported \*\*\*. Responses from Smead to staff questions, November 9, 2022, August 4, 2023, and October 11, 2023.

AUVs between U.S. producers are largely attributable to differences in product mix.<sup>8</sup> All three U.S. producers reported that the lowest net sales AUV product (basic manila file folder) accounted for the highest volume of sales. The share of branded compared to private label paper file folders also contributed to variations in net sales AUVs among U.S. producers.<sup>9</sup> Table VI-4 presents the number of unique paper file folders (tracked by stock keeping units (“SKUs”)) sold by each U.S. producer during the period examined. As shown in table VI-4, Smead reported \*\*\*.<sup>10</sup>

**Table VI-4**  
**Paper file folders: U.S. producers’ unique SKUs sold, by firm and period**

Count in number of unique SKUs

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
BSP Filing	***	***	***
Smead	***	***	***
TOPS	***	***	***

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

<sup>8</sup> For additional information on the effects of COVID-19 pandemic on financials, see table VI-12.

<sup>9</sup> “Private label” paper file folders are defined as paper file folders that “do not carry the brand name of the producer, but instead reflect a brand associated with the retailer” (e.g., Staples’ TRUE RED brand made by TOPS) or a “generic” brand. Petitioners testified that private label paper file folders make up roughly half of U.S. consumption and are “typically slightly lower for the private label” (e.g., Walmart’s Pen + Gear brand made by TOPS) while paper file folders under the Smead or TOPS’ Pentaflex brands have higher sales values. Petitioners’ postconference brief, exh. 26 and conference transcript, p. 20 (Avent) and pp. 66, 70 (Roberts).

<sup>10</sup> Smead stated \*\*\*. Petitioner’s posthearing brief, Smead’s U.S. producer questionnaire response, III-9e.

TOPS \*\*\*. Response from TOPS to staff questions, November 9, 2022 and TOPS’ U.S. producer questionnaire response, III-9e.

## Cost of goods sold and gross profit or loss

As presented in table VI-1, total raw material cost is the majority share of total COGS during the period examined (uncoated free sheet paper alone accounted for 47.0 to 49.2 percent of total COGS).<sup>11</sup> Total raw material costs irregularly increased in value from 2020 to 2022 (despite a decrease in total net sales volume from 2021 to 2022) but were lower in interim 2023 than in interim 2022.<sup>12</sup> On a per-unit basis, total raw materials consistently increased (representing mostly the increase in uncoated free sheet paper cost) and were higher in interim 2023 than in interim 2022.<sup>13</sup> As a ratio to net sales, total raw materials fluctuated within a narrow band (less than two percentage points) from 2020 to 2022, but then were noticeably lower in interim 2023 compared to interim 2022. Table VI-3 above presents company-specific raw material cost AUVs, with variations partially attributable to the large range of product mix.<sup>14</sup> <sup>15</sup> U.S. producers reported increased costs for the primary raw material (uncoated free sheet paper) as well as all other raw material components.<sup>16</sup>

Direct labor accounted for the second largest share of total COGS, irregularly increasing in absolute value despite a decline in net sales volume, especially from 2021 to 2022.<sup>17</sup> <sup>18</sup> Other

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<sup>11</sup> \*\*\* reported purchasing raw material inputs from related entities.

<sup>12</sup> U.S. producers' energy and utility costs are included in other raw material costs category for all five reporting periods.

<sup>13</sup> \*\*\* reported no issues with procuring uncoated paper from domestic suppliers while \*\*\*. U.S. producer questionnaire responses, III-8.

<sup>14</sup> The differences in product mix include variations in product offerings as noted earlier, with higher cost materials needed for certain paper file folders (e.g., hanging files that require metal pieces and expanding file folders that require additional manufacturing steps) than the lowest cost manila paper file folders.

<sup>15</sup> Smead and TOPS \*\*\*. Responses from Smead and TOPS to staff questions, November 9, 2022.

<sup>16</sup> \*\*\*. Response from Smead to staff questions, October 11, 2023.

<sup>17</sup> Smead and TOPS \*\*\*. Petitioner's posthearing brief, p. 8.

<sup>18</sup> Smead reported \*\*\*. Smead's U.S. producer questionnaire, III-10 and response from Smead to staff questions, October 11, 2023.

factory costs, which accounted for the third largest share of total COGS, also irregularly increased in absolute value from 2020 to 2022. Both direct labor and other factory costs were lower in interim 2023 than in interim 2022. When measured as a ratio to total net sales, direct labor and other factory costs were both relatively stable, with direct labor irregularly increasing while other factory costs irregularly decreasing from 2020 to 2022. For interim 2023, direct labor costs as a ratio to total net sales were \*\*\* higher while other factory costs were lower than interim 2023. On a per-unit basis, both direct labor and other factory costs consistently increased from 2020 to 2022 and were higher in interim 2023 than in interim 2022. Similar to raw materials, the differences of direct labor and other factory costs between Smead and TOPS are partly explained by variations in product mix between these two producers.<sup>19</sup>

As presented in table VI-1, total COGS inconsistently increased from 2020 to 2022 while the ratio of COGS to net sales inconsistently decreased over this period, reflecting a slightly slower increase in total COGS compared to revenue. The AUVs of COGS consistently increased from 2020 to 2022, reflecting the previously discussed increases in per-unit total raw materials, direct labor, and other factory costs (\*\*\*).<sup>20</sup> AUVs of COGS were higher while total COGS and the ratio of COGS to net sales were lower in interim 2023 than in interim 2022.

Based on the data in table VI-1, the aggregated gross profit of U.S. producers consistently increased from 2020 to 2022; gross profit was higher in interim 2023 than in interim 2022. As a ratio to net sales, gross profit inconsistently increased from 2020 to 2022 and was higher in interim 2023 than in interim 2022. The small increase in gross profits reported by the U.S. industry reflects revenue increasing more than COGS (lower volume sales but at higher prices). Between the comparable interim periods, total gross profit, gross profit as a ratio to net sales, and gross profit AUVs were all higher.

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<sup>19</sup> The \*\*\* U.S. producer \*\*\* reported \*\*\* higher direct labor costs per-unit than the industry average, largely attributable to \*\*\*.

<sup>20</sup> \*\*\* reported the lowest total COGS AUV of \*\*\* per folder for the manufacturing of the largest volume manila file folders. \*\*\*. U.S. producer questionnaire responses, III-9e.

## SG&A expenses and operating income or loss

As presented in table VI-1, U.S. producers' total SG&A expenses and AUVs of SG&A expenses increased from 2020 to 2022; total SG&A expenses were lower while AUVs of SG&A expenses were higher in interim 2023 than in interim 2022. The SG&A expense ratio (i.e., total SG&A expenses divided by net sales) also increased from 2020 to 2022 and also were higher in interim 2023 than in interim 2022. Table IV-3 shows that \*\*\* accounted for most of the SG&A expenses throughout all five data periods examined.<sup>21</sup>

Table VI-1 shows that U.S. producers' operating income, operating margins, and operating income AUVs all declined irregularly from 2020 to 2022 and were higher in interim 2023 than in interim 2022. Smead and TOPS explained that \*\*\*.<sup>22</sup> The declines in operating performance of U.S. producers (\*\*\*) over the full year periods are the result of SG&A expenses increasing more than gross profits.<sup>23</sup>

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<sup>21</sup> Smead explained that \*\*\*. Responses from Smead to staff questions, November 9, 2022 and October 11, 2023.

<sup>22</sup> Both Smead and TOPS noted that \*\*\*. Smead's Brad Beckman declared that \*\*\*. Petitioner's posthearing brief, pp. 5-8 and response from Smead to staff questions, October 11, 2023.

<sup>23</sup> Smead reported consistent \*\*\*, TOPS reported \*\*\* in operating income from 2020 to 2022.

## All other expenses and net income or loss

Classified below the operating income level are interest expenses, other expenses, and other income. In table VI-1, these items are aggregated and only the net amount is shown. Table VI-1 shows that net all other expenses and income irregularly decreased from 2020 to 2022 but were higher in interim 2023 than in interim 2022.

Net income consistently declined from 2020 to 2022, with negative net income reported in 2022 (\*\*\*) ; net income was higher in interim 2023 than in interim 2022.<sup>24</sup> The absolute difference between operating and net profits narrowed and widened in conjunction with changes in total interest expenses and all other income and expenses.<sup>25</sup>

## Capital expenditures and R&D expenses

Table VI-5 presents capital expenditures, by firm, and table VI-7 presents R&D expenses, by firm. Tables VI-6 and VI-8 present the firms' narrative explanations of the nature, focus, and significance of their capital expenditures and R&D expenses, respectively. One U.S. producer (\*\*\*) accounted for the vast majority of capital expenditures, which resulted from \*\*\* over the period examined.<sup>26</sup>

**Table VI-5**  
**Paper file folders: U.S. producers' capital expenditures, by firm and period**

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

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

<sup>24</sup> Smead explained that \*\*\*. Response from Smead to staff questions, October 11, 2023.

<sup>25</sup> A variance analysis is not shown mostly due to large differences in product mix as well as the production of other products. These differences result in wide variations in the costs allocated to file folder operations as well as the different cost structures among the reporting firms.

<sup>26</sup> Response from Smead to staff questions, October 11, 2023.

**Table VI-6****Paper file folders: U.S. producers' narrative descriptions of their capital expenditures, by firm**

<b>Firm</b>	<b>Narrative on capital expenditures</b>
BSP Filing	***
Smead	***
TOPS	***

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

**Table VI-7****Paper file folders: U.S. producers' R&D expenses, by firm and period**

Value in 1,000 dollars

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
BSP Filing	***	***	***	***	***
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

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

**Table VI-8****Paper file folders: U.S. producers' narrative descriptions of their R&D expenses, by firm**

<b>Firm</b>	<b>Narrative on R&amp;D expenses</b>
***	***

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

## Assets and return on assets

Table VI-9 presents data on the U.S. producers' total assets while table VI-10 presents their operating ROA.<sup>27</sup> Table VI-11 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time. One U.S. producer (\*\*\*) accounted for the majority of net assets for the industry, with paper file folder operations in \*\*\* over the period examined.

**Table VI-9**  
**Paper file folders: U.S. producers' total net assets, by firm and period**

Value in 1,000 dollars

Firm	2020	2021	2022
BSP Filing	***	***	***
Smead	***	***	***
TOPS	***	***	***
All firms	***	***	***

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

**Table VI-10**  
**Paper file folders: U.S. producers' ROA, by firm and period**

Ratio in percent

Firm	2020	2021	2022
BSP Filing	***	***	***
Smead	***	***	***
TOPS	***	***	***
All firms	***	***	***

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

**Table VI-11**  
**Paper file folders: U.S. producers' narrative descriptions of their total net assets, by firm**

Firm	Narrative on assets
Smead	***
TOPS	***

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

<sup>27</sup> The operating 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 on a product-specific basis.



## COVID-19 and financial performance

Table VI-12 presents the U.S. producers' narrative responses regarding the effects of COVID-19 on their financial performance.

**Table VI-12**

**Paper file folders: Narrative responses relating to COVID-19 pandemic effects on U.S. producers' financial performance, since January 1, 2020**

<b>Firm</b>	<b>Narrative response on COVID-19</b>
BSP Filing	***
Smead	***
TOPS	***

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

## Capital and investment

The Commission requested U.S. producers of paper file folders to describe any actual or potential negative effects of imports of paper file folders from China, India, and/or Vietnam on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table VI-13 presents the number of firms reporting an impact in each category and table VI-14 provides the U.S. producers' narrative responses.

**Table VI-13**

**Paper file folders: Count of firms indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2020, by effect**

Number of firms reporting

Effect	Category	Count
Cancellation, postponement, or rejection of expansion projects	Investment	0
Denial or rejection of investment proposal	Investment	0
Reduction in the size of capital investments	Investment	1
Return on specific investments negatively impacted	Investment	0
Other investment effects	Investment	2
Any negative effects on investment	Investment	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
Any negative effects on growth and development	Growth	2
Anticipated negative effects of imports	Future	2

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

Note: \*\*\*. BSP Filing's U.S. producer questionnaire response, III-20.

**Table VI-14****Paper file folders: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2020, by firm and effect**

<b>Item</b>	<b>Firm name and narrative on impact of imports</b>
Reduction in the size of capital investments	***
Other negative effects on investments	***
Other negative effects on investments	***
Other effects on growth and development	***
Other effects on growth and development	***
Anticipated effects of imports	***
Anticipated effects of imports	***

Table continued.

Item	Firm name and narrative on impact of imports
Reduction in the size of capital investments	***
Other negative effects on investments	***
Other negative effects on investments	***
Other effects on growth and development	***
Other effects on growth and development	***
Anticipated effects of imports	***
Anticipated effects of imports	***

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<sup>1</sup>--*

- (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,*

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<sup>1</sup> 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).<sup>2</sup>*

Information on the nature of the subsidies was presented earlier in this report; 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.

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<sup>2</sup> 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 China

The Commission issued foreign producers' or exporters' questionnaires to ten firms believed to produce and/or export paper file folders from China.<sup>3</sup> The Commission did not receive responses from any firm.

### Operations on paper file folders<sup>4</sup>

During the preliminary phase of these investigations, the Commission received a response to its questionnaire from one firm, Guangbo Import & Export Company ("Guangbo"). Guangbo's practical capacity was \*\*\* paper file folders in 2020, \*\*\* folders in 2021, and \*\*\* folders in interim 2022. Guangbo reported producing \*\*\* folders in 2020, \*\*\* folders in 2021, and \*\*\* folders in interim 2022. Guangbo \*\*\* in 2023.<sup>5</sup> Guangbo's capacity utilization was over \*\*\* percent in 2020, 2021, and interim 2022.

Export shipments to the United States accounted for \*\*\* of Guangbo's shipments in 2020, 2021, and interim 2022. Guangbo exported \*\*\* folders to the United States in 2020, \*\*\* folders in 2021, and \*\*\* folders in interim 2022. The firm \*\*\* in 2023.

### Exports

The United States was the largest export market for binders (other than book covers), folders and file covers, of paper or paperboard, from China, by quantity, in 2022, accounting for 14.7 percent of all exports. Japan, the United Kingdom, Australia, and the United Arab Emirates were the next largest export markets in 2022, accounting for 5.8 percent, 5.3 percent, 5.1 percent, and 3.6 percent, respectively. Table VII-1 presents data for exports of binders (other than book covers), and folders and file covers, of paper or paperboard, which includes paper file folders, from China in descending order of quantity for 2022.

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<sup>3</sup> These firms were identified through a review of information submitted in the petitions and presented in third-party sources.

<sup>4</sup> Unless otherwise noted, information is based on Investigation Nos. 701-TA-683 and 731-TA-1594-1596 (Preliminary): Paper File Folders from China, India, and Vietnam, Confidential Report, INV-UU-113, November 21, 2022 ("Preliminary confidential report"), pp. VII-5-VII-7.

<sup>5</sup> The lack of projections for 2023 is due to the firm's \*\*\*.

**Table VII-1**  
**Binders (other than book covers) and folders and file covers, of paper or paperboard: Exports**  
**from China, by period**

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

<b>Destination market</b>	<b>Measure</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
United States	Quantity	21,319	14,403	16,646
Japan	Quantity	7,690	6,922	6,547
United Kingdom	Quantity	6,996	7,395	5,984
Australia	Quantity	7,501	8,363	5,790
United Arab Emirates	Quantity	1,706	1,877	4,041
Netherlands	Quantity	4,690	3,026	3,887
Taiwan	Quantity	88	699	3,113
Vietnam	Quantity	2,106	1,186	2,548
Russia	Quantity	2,562	2,847	2,512
All other destination markets	Quantity	48,164	53,998	62,405
All destination markets	Quantity	102,823	100,717	113,473
United States	Value	26,495	23,898	30,555
Japan	Value	11,666	10,535	9,393
United Kingdom	Value	6,362	6,826	5,404
Australia	Value	11,303	16,127	11,369
United Arab Emirates	Value	1,172	1,815	4,048
Netherlands	Value	4,464	2,826	3,704
Taiwan	Value	339	593	2,151
Vietnam	Value	2,997	1,175	2,311
Russia	Value	2,162	2,449	2,144
All other destination markets	Value	57,473	66,781	78,567
All destination markets	Value	124,433	133,025	149,646

Table continued.



**Table VII-1 Continued**  
**Binders (other than book covers) and folders and file covers, of paper or paperboard: Exports from China, by period**

Unit value in dollars per 1,000 pounds; share in percent

<b>Destination market</b>	<b>Measure</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
United States	Unit value	1,243	1,659	1,836
Japan	Unit value	1,517	1,522	1,435
United Kingdom	Unit value	909	923	903
Australia	Unit value	1,507	1,928	1,964
United Arab Emirates	Unit value	687	967	1,002
Netherlands	Unit value	952	934	953
Taiwan	Unit value	3,879	848	691
Vietnam	Unit value	1,423	990	907
Russia	Unit value	844	860	854
All other destination markets	Unit value	1,193	1,237	1,259
All destination markets	Unit value	1,210	1,321	1,319
United States	Share of quantity	20.7	14.3	14.7
Japan	Share of quantity	7.5	6.9	5.8
United Kingdom	Share of quantity	6.8	7.3	5.3
Australia	Share of quantity	7.3	8.3	5.1
United Arab Emirates	Share of quantity	1.7	1.9	3.6
Netherlands	Share of quantity	4.6	3.0	3.4
Taiwan	Share of quantity	0.1	0.7	2.7
Vietnam	Share of quantity	2.0	1.2	2.2
Russia	Share of quantity	2.5	2.8	2.2
All other destination markets	Share of quantity	46.8	53.6	55.0
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 4820.30 as reported by China Customs in the Global Trade Atlas Suite database, accessed July 17, 2023.

Note: United States is shown at the top. All remaining top export destinations are shown in descending order of 2022 data. HS subheading 4820.30 is a basket category that contains products that are outside the scope of these investigations.

## The industry in India

The Commission issued foreign producers' or exporters' questionnaires to eight firms believed to produce and/or export paper file folders from India.<sup>6</sup> A usable response to the Commission's questionnaire was received from Navneet Education Limited ("Navneet"). Navneet's exports to the United States accounted for approximately \*\*\* percent of reported U.S. imports of paper file folders from India in 2022. Navneet estimates that it accounted for \*\*\* percent of overall production of paper file folders in India in 2022. Table VII-2 presents information on Navneet's paper file folder operations in India.

**Table VII-2**  
**Paper file folders: Summary data for Indian producer Navneet, 2022**

Firm	Production (1,000 folders)	Share of reported production (percent)	Exports to the United States (1,000 folders)	Share of reported exports to the United States (percent)	Total shipments (1,000 folders)	Share of firm's total shipments exported to the United States (percent)
Navneet	***	100.0	***	100.0	***	***
All firms	***	100.0	***	100.0	***	***

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

## Changes in operations

Navneet was asked to report any changes in the character of its operations or organization relating to the production of paper file folders since 2020. Table VII-3 presents the changes in operations identified by Navneet.

**Table VII-3**  
**Paper file folders: Reported changes in operations by Indian producer Navneet since January 1, 2020**

Item	Firm name and accompanying narrative response
Expansions	***

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

<sup>6</sup> These firms were identified through a review of information submitted in the petitions and presented in third-party sources.

## Operations on paper file folders

Table VII-4 presents data on Navneet’s installed and practical capacity and production on the same equipment used to produce paper file folders.

**Table VII-4**  
**Paper file folders: Indian producer Navneet’s installed and practical capacity and production on the same equipment as in-scope production, by period**

Quantity in 1,000 folders; share and ratio in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical paper file folders	Capacity	***	***	***	***	***
Practical paper file folders	Production	***	***	***	***	***
Practical paper file folders	Utilization	***	***	***	***	***

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

Table VII-5 presents India producers’ reported capacity constraints since January 1, 2020.

**Table VII-5**  
**Paper file folders: Indian producer Navneet’s reported practical capacity constraints since January 1, 2020**

Item	Firm name and narrative response on constraints to practical overall capacity
Other constraints	***

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

Table VII-6 presents data on Navneet's paper file folders operations in India. Navneet's practical capacity increased by \*\*\* percent from 2020 to 2022, with the majority of the increase occurring from 2021 to 2022.<sup>7</sup> Its practical capacity was the same in both interim periods. Navneet's practical capacity is projected to be \*\*\* percent higher in 2023 than in 2022 and \*\*\* from 2023 to 2024. Navneet's production moved in the same direction as its practical capacity, increasing by \*\*\* percent from 2020 to 2022, with the majority of the increase occurring from 2021 to 2022.<sup>8</sup> However, its production was \*\*\* percent lower in interim 2023 than in interim 2022.<sup>9</sup> Navneet's production is projected to be \*\*\* percent lower in 2023 than in 2022 and \*\*\* percent lower in 2024 than in 2023.

Navneet's capacity utilization increased each year during 2020-22, reaching full capacity in 2022 and remaining above \*\*\* percent during that period. However, its capacity utilization was \*\*\* percentage points lower in interim 2023 than in interim 2022 as it reported lower production while maintaining the same level of capacity. Navneet's capacity utilization is projected to be \*\*\* percentage points lower in 2023 than in 2022 and \*\*\* percentage points lower in 2023 than in 2024.

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<sup>7</sup> The yearly increases in production capacity during 2020-22 correspond with \*\*\*. Email from \*\*\*, October 21, 2022 and email from \*\*\*, August 4, 2023.

<sup>8</sup> Navneet noted that the yearly increase in production during 2020-22 was due to \*\*\*. Email from \*\*\*, August 4, 2023.

<sup>9</sup> Navneet noted that the reduced production in interim 2023, compared with interim 2022, can be attributed to \*\*\*. Email from \*\*\*, August 4, 2023.

**Table VII-6**  
**Paper file folders: Data on Indian producer Navneet's operations, by period**

Quantity in 1,000 folders; ratio and share in percent

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
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	***	***	***	***	***	***	***
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	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Export shipments accounted for \*\*\* of Navneet’s shipments during the period for which data were collected, with \*\*\* of its exports going to the United States.<sup>10</sup> Moving in the same direction as its production, Navneet’s exports to the United States increased by \*\*\* percent during 2020-22, with the majority of the increase occurring from 2021 to 2022.<sup>11</sup> However, it was \*\*\* percent lower in interim 2023 than in interim 2022.<sup>12</sup> Navneet’s exports to the United States are projected to be \*\*\* percent lower in 2023 than in 2022 and \*\*\* percent lower in 2024 than in 2023.<sup>13</sup>

## **Alternative products**

As shown in table VII-7, paper file folders accounted for \*\*\* of Navneet’s total production on shared equipment in each year during 2020-22 and in interim 2023. Navneet reported producing \*\*\* on the shared equipment.

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<sup>10</sup> Navneet reported \*\*\*. Navneet also noted that \*\*\*, Email from \*\*\*, August 4, 2023.

<sup>11</sup> Navneet reported that \*\*\*. Email from \*\*\*, October 31, 2022 and email from \*\*\*, August 4, 2023.

<sup>12</sup> Navneet attributes the decrease in its exports to the United States to \*\*\*. Email from \*\*\*, August 4, 2023.

<sup>13</sup> Navneet based its projections for calendar year 2023 \*\*\*. Email from \*\*\*, August 4, 2023.

**Table VII-7**  
**Paper file folders: Indian producer Navneet’s production on the same equipment as in-scope production, by period**

Quantity in 1,000 folders; share in percent

Product type	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Paper file folders	Quantity	***	***	***	***	***
Excluded folders	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
Out of scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
Paper file folders	Share	***	***	***	***	***
Excluded folders	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
Out of scope products	Share	***	***	***	***	***
All products	Share	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

## Exports

The United States was the largest export market for binders (other than book covers), and folders and file covers, of paper or paperboard from India, by quantity, in 2022, accounting for 81.9 percent of all exports. The United States was the only market to account for more than 3.0 percent of exports of binders (other than book covers), and folders and file covers, of paper or paperboard from India, by quantity, in 2022. Table VII-8 presents data for exports of binders (other than book covers), and folders and file covers, of paper or paperboard, which includes paper file folders, from India in descending order of quantity for 2022.

**Table VII-8**  
**Binders (other than book covers) and folders and file covers, of paper or paperboard: Exports**  
**from India, by period**

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

<b>Destination market</b>	<b>Measure</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
United States	Quantity	4,741	6,564	11,901
Saudi Arabia	Quantity	105	235	364
United Arab Emirates	Quantity	48	61	296
Burkina Faso	Quantity	90	107	240
Tanzania	Quantity	33	36	215
Madagascar	Quantity	---	---	200
Nepal	Quantity	23	62	165
Bhutan	Quantity	90	87	153
Oman	Quantity	0	66	117
All other destination markets	Quantity	770	906	886
All destination markets	Quantity	5,900	8,125	14,536
United States	Value	5,001	6,478	10,506
Saudi Arabia	Value	101	163	295
United Arab Emirates	Value	58	63	191
Burkina Faso	Value	83	112	116
Tanzania	Value	33	26	288
Madagascar	Value	---	---	82
Nepal	Value	18	40	74
Bhutan	Value	75	98	110
Oman	Value	1	25	49
All other destination markets	Value	795	867	898
All destination markets	Value	6,165	7,872	12,609

Table continued.



**Table VII-8 Continued**  
**Binders (other than book covers) and folders and file covers, of paper or paperboard: Exports**  
**from India, by period**

Unit value in dollars per 1,000 pounds; share in percent

<b>Destination market</b>	<b>Measure</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
United States	Unit value	1,055	987	883
Saudi Arabia	Unit value	965	694	810
United Arab Emirates	Unit value	1,201	1,041	643
Burkina Faso	Unit value	916	1,042	484
Tanzania	Unit value	1,019	735	1,337
Madagascar	Unit value	---	---	411
Nepal	Unit value	783	655	448
Bhutan	Unit value	837	1,130	720
Oman	Unit value	1,409	370	417
All other destination markets	Unit value	1,033	957	1,013
All destination markets	Unit value	1,045	969	867
United States	Share of quantity	80.4	80.8	81.9
Saudi Arabia	Share of quantity	1.8	2.9	2.5
United Arab Emirates	Share of quantity	0.8	0.8	2.0
Burkina Faso	Share of quantity	1.5	1.3	1.6
Tanzania	Share of quantity	0.6	0.4	1.5
Madagascar	Share of quantity	---	---	1.4
Nepal	Share of quantity	0.4	0.8	1.1
Bhutan	Share of quantity	1.5	1.1	1.1
Oman	Share of quantity	0.0	0.8	0.8
All other destination markets	Share of quantity	13.1	11.2	6.1
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official export statistics under HS subheading 4820.30, as reported by the Indian Ministry of Commerce in the Global Trade Atlas Suite in the Global Trade Atlas database, accessed July 17, 2023.

Note: United States is shown at the top. All remaining top export destinations are shown in descending order of 2022 data. HS subheading 4820.30 is a basket category that contains products that are outside the scope of these investigations.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

## The industry in Vietnam

The Commission issued foreign producers’ or exporters’ questionnaires to five firms believed to produce and/or export paper file folders from Vietnam.<sup>14</sup> A usable response to the Commission’s questionnaire were received from Three-Color Stone Stationery (“TCS”).<sup>15</sup> These firms’ exports to the United States accounted for approximately \*\*\* percent of reported U.S. imports of paper file folders from Vietnam in 2022. TCS estimates that it accounted for \*\*\* percent of total production of paper file folders in Vietnam in 2022. Table VII-9 presents information on TCS’s paper file folder operations in Vietnam.

**Table VII-9**  
**Paper file folders: Summary data for Vietnamese producer TCS, 2022**

Quantity in 1,000 folders; share in percent

Firm	Production (1,000 folders)	Share of reported production (percent)	Exports to the United States (1,000 folders)	Share of reported exports to the United States (percent)	Total shipments (1,000 folders)	Share of firm's total shipments exported to the United States (percent)
TCS Stone	***	100.0	***	100.0	***	***
All firms	***	100.0	***	100.0	***	***

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

## Changes in operations

TCS was asked to report any changes in the character of its operations or organization relating to the production of paper file folders since 2020. Table VII-10 presents the changes in operations identified by TCS.

<sup>14</sup> These firms were identified through a review of information submitted in the petitions and presented in third-party sources.

<sup>15</sup> In the preliminary phase of these investigations, the Commission also received a response to its questionnaire from Fairton Asia Limited (“Fairton Asia”). Fairton Asia reported producing \*\*\* folders in 2020, \*\*\* folders in 2021 and \*\*\* folders in interim 2022. The firm reported exporting \*\*\* folders to the United States in 2020, \*\*\* folders in 2021 and \*\*\* folders in interim 2022. It projected producing \*\*\* folders in 2022 and \*\*\* folders in 2023. Fairton Asia projected exporting \*\*\* folders to the United States in 2022 and \*\*\* folders in 2023. \*\*\*. Preliminary confidential report, pp. VII-18-VII-19.

**Table VII-10****Paper file folders: Reported changes in operations by Vietnamese producer TCS since January 1, 2020**

Item	Firm name and accompanying narrative response
Plant openings	***
Production curtailments	***
Expansions	***

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

## Operations on paper file folders

Table VII-11 presents data on TCS's installed and practical capacity and production on the same equipment used to produce paper file folders.

**Table VII-11****Paper file folders: Vietnamese producer TCS's installed and practical capacity and production on the same equipment as in-scope production, by period**

Capacity and production in 1,000 folders; utilization in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical paper file folders	Capacity	***	***	***	***	***
Practical paper file folders	Production	***	***	***	***	***
Practical paper file folders	Utilization	***	***	***	***	***

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

Table VII-12 presents TCS's reported capacity constraints since January 1, 2020.

**Table VII-12**

**Paper file folders: Vietnamese producer TCS's reported capacity constraints since January 1, 2020**

<b>Item</b>	<b>Firm name and narrative response on constraints to practical overall capacity</b>
Existing labor force	***
Storage capacity	***.
Logistics/transportation	***.

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

TCS's practical capacity increased by \*\*\* percent from 2020 to 2022, with the majority of the increase occurring from 2021 to 2022.<sup>16</sup> Its practical capacity was the same in interim 2022 and interim 2023. The firm's practical capacity is projected to be \*\*\* in 2023 and 2024. Moving in the same direction as its practical capacity, TCS's production increased by \*\*\* percent during 2020-22, with the majority of the increase occurring from 2021 to 2022.<sup>17</sup> However, it was \*\*\* percent lower in interim 2023 than in interim 2022 and is projected to be \*\*\* for calendar year 2023 as interim 2023, which would be \*\*\* percent lower than in 2022.<sup>18</sup> The firm \*\*\* in 2024, which is a reflection of its \*\*\*.<sup>19</sup>

TCS's capacity utilization decreased in each year during 2020-22, most noticeably from 2021 to 2022, when it fell under \*\*\* percent for the first time during the period. It was \*\*\* percentage points lower in interim 2023 than in interim 2022, reaching a period-low, as the firm reported lower production while maintaining the same level of practical capacity. Its capacity utilization is projected to be \*\*\* percentage points lower in 2023 than in 2022. Table VII-13 presents data on TCS's paper file folder operations in Vietnam.

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<sup>16</sup> Representatives from TCS noted that \*\*\*. Email response from \*\*\*, August 19, 2023.

<sup>17</sup> These increases in production reflect the changes in capacity due to the aforementioned \*\*\*.

<sup>18</sup> In its response to the Commission's questionnaire, TCS reported \*\*\*.

<sup>19</sup> TCS reported that \*\*\*. Email from \*\*\*, September 6, 2023.

**Table VII-13**  
**Paper file folders: Data on Vietnamese producer TCS's operations, by period**

Quantity in 1,000 folders; ratio and share in percent

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
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	***	***	***	***	***	***	***
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	100.0	100.0	100.0	100.0	100.0	100.0	---

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

Export shipments accounted for \*\*\* of TCS's shipments during the period for which data were collected, with \*\*\* of its exports going to the United States.<sup>20</sup> Moving in the same direction as its production, TCS's exports to the United States increased by \*\*\* percent during 2020-22, with the majority of the increase occurring from 2021 to 2022.<sup>21</sup> However, its exports to the United States were \*\*\* percent lower in interim 2023 than in interim 2022.<sup>22</sup> TCS's exports to the United States are projected to be \*\*\* for calendar year 2023 as interim 2023, which would be \*\*\* percent lower than 2022.<sup>23</sup> The firm \*\*\*.<sup>24</sup>

## Alternative products

As shown in table VII-14, paper file folders accounted for a minority of TCS's total production on shared equipment in 2020 and 2021, and a majority in 2022 as its production of paper file folders increased at a higher rate from 2021 to 2022 than its production of out-of-scope merchandise. Paper file folders accounted for \*\*\* TCS's production on shared equipment in interim 2023. The firm reported producing \*\*\* on shared equipment.

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<sup>20</sup> TCS reported \*\*\*.

<sup>21</sup> The increase the firm's export shipments to the United States from 2021 to 2022 is due to \*\*\*. Email from \*\*\*, August 9, 2023.

<sup>22</sup> TCS reported that \*\*\*. Email from \*\*\*, August 9, 2023.

<sup>23</sup> This projection \*\*\*.

<sup>24</sup> TCS reported that \*\*\*. Email from \*\*\*, August 9, 2023.

**Table VII-14****Paper file folders: Vietnamese producer TCS's production on the same equipment as in-scope production, by period**

Quantity in 1,000 folders; share in percent

Product type	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Paper file folders	Quantity	***	***	***	***	***
Excluded folders	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
Out of scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
Paper file folders	Share	***	***	***	***	***
Excluded folders	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
Out of scope products	Share	***	***	***	***	***
All products	Share	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Exports**

The United States was the largest export market for binders (other than book covers), and folders and file covers, of paper or paperboard, from Vietnam in 2022, by value, accounting for 59.6 percent of all exports. Japan was the second largest market, accounting for 37.7 percent. No other market accounted for more than 1.0 percent, by value, of exports of binders (other than book covers), and folders and file covers, of paper or paperboard, from Vietnam in 2022. Table VII-15 presents data for exports of binders (other than book covers), and folders and file covers, of paper or paperboard, which includes paper file folders, from Vietnam in descending order of value for 2022.



**Table VII-15**  
**Binders (other than book covers) and folders and file covers, of paper or paperboard: Exports**  
**from Vietnam, by period**

Value in 1,000 dollars; share in percent

Destination market	Measure	2020	2021	2022
United States	Value	27,229	30,671	53,251
Japan	Value	36,063	30,188	33,675
Mexico	Value	31	287	871
Canada	Value	33	200	406
China	Value	90	188	390
Italy	Value	---	99	100
Lithuania	Value	---	31	---
Singapore	Value	2	27	56
Hong Kong	Value	86	27	2
All other destination markets	Value	108	99	586
All destination markets	Value	63,642	61,816	89,337
United States	Share of value	42.8	49.6	59.6
Japan	Share of value	56.7	48.8	37.7
Mexico	Share of value	0.0	0.5	1.0
Canada	Share of value	0.1	0.3	0.5
China	Share of value	0.1	0.3	0.4
Italy	Share of value	---	0.2	0.1
Lithuania	Share of value	---	0.1	---
Singapore	Share of value	0.0	0.0	0.1
Hong Kong	Share of value	0.1	0.0	0.0
All other destination markets	Share of value	0.2	0.2	0.7
All destination markets	Share of value	100.0	100.0	100.0

Source: Official import statistics of Vietnam (constructed export statistics for Vietnam) under HS subheading 4820.30 as reported by various statistical report authorities in the Global Trade Atlas database, accessed July 17, 2023.

Note: United States is shown at the top. All remaining top export destinations are shown in descending order of 2022 data. Quantity data is unavailable for some destination markets. HS subheading 4820.30 is a basket category that contains products that are outside the scope of these investigations.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

## Subject countries combined

Table VII-16 presents summary data on paper file folders operations of the reporting subject producers in the subject countries.

**Table VII-16**  
**Paper file folders: Data on the industry in subject countries, by period**

Quantity in 1,000 folders; ratio and share in percent

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
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	***	***	***	***	***	***	***
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	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

## U.S. inventories of imported merchandise

Responding U.S. importers' end-of-period inventories of imports from China fluctuated year to year during 2020-22, increasing from 2020 to 2021, then decreasing from 2021 to 2022, ending \*\*\* percent lower in 2022 than in 2020. End-of-period inventories of imports from Vietnam also fluctuated year to year, increasing from 2020 to 2021, then decreasing from 2021 to 2022. However, they ended \*\*\* higher in 2022 than in 2020. End-of-period inventories from China were \*\*\* percent lower in interim 2023 than in interim 2022, while end-of-period inventories from Vietnam were \*\*\* percent higher. There were no reported end-of-period inventories of imports from India during 2020-22 and in interim 2023.

Overall, end-of-period inventories of subject imports fluctuated year to year during 2020-22, increasing from 2020 to 2021, then decreasing from 2021 to 2022, ending \*\*\* percent higher in 2022 than in 2020. They were \*\*\* percent higher in interim 2023 than in interim 2022. End-of-period inventories of imports from Mexico increased in each year during 2020-22, most notably from 2020 to 2021, ending \*\*\* percent higher in 2022 than in 2020. It was several times higher than the end-of-period inventories of imports from China and Vietnam. This yearly increase coincided with decreases in such imports.<sup>25</sup> End-of-period inventories of imports from Mexico were \*\*\* percent higher in interim 2023 than in interim 2022. Table VII-17 presents data on U.S. importers' reported end-of-period inventories of paper file folders.

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<sup>25</sup> The decrease in U.S. imports from Mexico is entirely attributable to \*\*\* operations since these firms accounted for \*\*\* such imports during 2020-22. Representatives from \*\*\* reported that the decrease in its imports was due to \*\*\*. Representatives from \*\*\* reported that the decrease in its imports reflects its decision to \*\*\*. \*\*\*, August 4, 2023, p. 2 and \*\*\*, August 7, 2023, p. 4.

**Table VII-17**

**Paper file folders: U.S. importers' inventories and their ratio to select items, by source and period**

Quantity in 1,000 folders; ratio in percent

Measure	Source	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Inventories quantity	China	***	***	***	***	***
Ratio to imports	China	***	***	***	***	***
Ratio to U.S. shipments of imports	China	***	***	***	***	***
Ratio to total shipments of imports	China	***	***	***	***	***
Inventories quantity	India	***	***	***	***	***
Ratio to imports	India	***	***	***	***	***
Ratio to U.S. shipments of imports	India	***	***	***	***	***
Ratio to total shipments of imports	India	***	***	***	***	***
Inventories quantity	Vietnam	***	***	***	***	***
Ratio to imports	Vietnam	***	***	***	***	***
Ratio to U.S. shipments of imports	Vietnam	***	***	***	***	***
Ratio to total shipments of imports	Vietnam	***	***	***	***	***
Inventories quantity	Subject	***	***	***	***	***
Ratio to imports	Subject	***	***	***	***	***
Ratio to U.S. shipments of imports	Subject	***	***	***	***	***
Ratio to total shipments of imports	Subject	***	***	***	***	***
Inventories quantity	Mexico	***	***	***	***	***
Ratio to imports	Mexico	***	***	***	***	***
Ratio to U.S. shipments of imports	Mexico	***	***	***	***	***
Ratio to total shipments of imports	Mexico	***	***	***	***	***
Inventories quantity	All other sources	***	***	***	***	***
Ratio to imports	All other sources	***	***	***	***	***
Ratio to U.S. shipments of imports	All other sources	***	***	***	***	***
Ratio to total shipments of imports	All other sources	***	***	***	***	***
Inventories quantity	Nonsubject	***	***	***	***	***
Ratio to imports	Nonsubject	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject	***	***	***	***	***
Ratio to total shipments of imports	Nonsubject	***	***	***	***	***
Inventories quantity	All sources	***	***	***	***	***
Ratio to imports	All sources	***	***	***	***	***
Ratio to U.S. shipments of imports	All sources	***	***	***	***	***
Ratio to total shipments of imports	All sources	***	***	***	***	***

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

The ratio of responding U.S. importers' end-of-period inventories to their imports from China fluctuated year to year, increasing from 2020 to 2021, then decreasing from 2021 to 2022, ending \*\*\* percentage points higher in 2022 than in 2020. After a more modest increase from 2020 to 2021, the ratio of responding U.S. importers' end-of-period inventories to their imports from Vietnam decreased more noticeably from 2021 to 2022, ending \*\*\* percentage points lower in 2022 than in 2020. The ratio of responding U.S. importers' end-of-period inventories to their imports from China was \*\*\* percentage points higher in interim 2023 than in interim 2022, while the ratio of their end-of-period inventories to their imports from Vietnam was \*\*\* percentage points lower.

Overall, the ratio of responding U.S. importers' end-of-period inventories to their subject imports fluctuated year to year, increasing from 2020 to 2021, then decreasing from 2021 to 2022, ending \*\*\* percentage points lower in 2022 than in 2020. It was \*\*\* percentage points lower in interim 2023 than in interim 2022. The ratio of responding U.S. importers' end-of-period inventories to their imports from Mexico increased in each year during 2020-22, ending \*\*\* percentage points higher in 2022 than in 2020. It ended several times higher than the ratio of responding U.S. importers' end-of-period inventories to their imports from Vietnam and China. The ratio of responding U.S. importers' end-of-period inventories to their imports from Mexico was approximately \*\*\* percentage points higher in interim 2023 than in interim 2022.<sup>26</sup> Table VII-17 presents data on U.S. importers' reported end-of-period inventories of paper file folders.

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<sup>26</sup> The noticeable difference in the ratio between the two interim periods reflects the lower quantity of imports from Mexico in interim 2023, compared with interim 2022, which is due to the aforementioned \*\*. \*\*, August 4, 2023, p. 2 and \*\*, August 7, 2023, p. 4.

## U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of paper file folders from China, India, Vietnam, or nonsubject sources after June 30, 2023. Table VII-18 presents the 12 responding U.S. importers' arranged imports after June 30, 2023.<sup>27</sup>

**Table VII-18**  
**Paper file folders: U.S. importers' arranged imports, by source and period**

Quantity in 1,000 folders

Source	Jul-Sept 2023	Oct-Dec 2023	Jan-Mar 2024	Apr-Jun 2024	Total
China	***	***	***	***	***
India	***	***	***	***	***
Vietnam	***	***	***	***	***
Subject sources	***	***	***	***	***
Mexico	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All sources	***	***	***	***	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

## Third-country trade actions

Based on available information, paper file folders from China, India, and Vietnam have not been subject to antidumping or countervailing duty investigations outside the United States.<sup>28</sup>

<sup>27</sup> Various importers noted that \*\*\* have impacted the quantity of their arranged imports. Email from \*\*\*, August 4, 2023; email from \*\*\*, July 24, 2023; email from \*\*\*, August 4, 2023; \*\*\*, August 7, 2023, p. 1; email from \*\*\*, August 9, 2023; and email from \*\*\*, August 15, 2023.

<sup>28</sup> World Trade Organization (“WTO”), “Anti-dumping,” [https://www.wto.org/english/tratop\\_e/adp\\_e/adp\\_e.htm](https://www.wto.org/english/tratop_e/adp_e/adp_e.htm), retrieved September 14, 2023; and WTO, “Subsidies and Countervailing Measures,” [https://www.wto.org/english/tratop\\_e/scm\\_e/scm\\_e.htm](https://www.wto.org/english/tratop_e/scm_e/scm_e.htm), retrieved September 14, 2023.

## Information on nonsubject countries

Global exports of binders (other than book covers) and folders and file covers, of paper or paperboard increased by 16.2 percent from 2020 to 2022 (increasing by 4.7 percent in 2022, after increasing by 11.0 percent in 2021). Global exports reportedly were tempered by the pandemic in 2020, due to supply constraints and lower demand as downstream consuming businesses closed.<sup>29</sup>

The combined export share of subject countries (China, India, and Vietnam) ranged from 32.1 percent to 38.1 percent during 2020-22. The combined increase in exports from the subject countries accounted for 62.3 percent of the 2020-22 global increase, mostly on increased exports from Vietnam and China.

China was the largest global exporter of these products in every year, during 2020-22. China's share experienced a slight increase—from 21.9 percent in 2020 to 21.1 percent in 2021 to 22.6 percent in 2022—of total global export value. Vietnam was the second largest global exporter of binders, folders, and file covers in 2022 (fourth largest in 2021 and third largest in 2020). Vietnam's total value of global exports have increased from \$63.6 million in 2020 to \$89.3 million in 2022 (40.4 percent). India's exports represent a relatively small share of global exports, accounting for 1.9 percent in 2022, a small uptick from 1.1 percent in 2020. India's total value of global exports have increased from \$6.2 million in 2020 to \$12.6 million in 2022 (104.5 percent).

Mexico was the third largest global exporter of binders, folders, and file covers in 2022 (third largest in 2021 and second largest in 2020). Mexico's total value of global exports have increased from \$68.8 million in 2020 to \$79.6 million in 2022 (15.7 percent). Mexico experienced a slight increase in its global export share from 12.1 percent in 2020 to 12.4 percent in 2021 and a slight decline to 12.0 percent in 2022. Table VII-19 presents the largest global export sources for binders, folders, and file covers (which includes paper file folders as well as out-of-scope products) during 2020-22.

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<sup>29</sup> Wood, Grace. "The Retail Market for Stationery Products," IBISWorld, September 2021; Chappel, Bill. "All 50 U.S. States have now started to reopen, Easing COVID-19 shutdown," NPR, May 20, 2020, <https://www.npr.org/sections/coronavirus-live-updates/2020/05/20/859723846/all-50-u-s-states-have-now-started-to-reopen-easing-covid-19-shutdown>.

**Table VII-19****Binders (other than book covers) and folders and file covers, of paper or paperboard: Global exports, by exporting country and period**

Value in 1,000 dollars, share in percent

Exporting country	Measure	2020	2021	2022
United States	Value	20,251	19,891	21,331
China	Value	124,433	133,025	149,646
India	Value	6,165	7,872	12,609
Vietnam	Value	63,642	61,816	89,337
Subject exporters	Value	194,240	202,713	251,591
Mexico	Value	68,829	78,354	79,619
Germany	Value	59,102	62,316	59,669
Poland	Value	41,671	57,726	52,175
Czech Republic	Value	35,249	41,681	36,105
France	Value	27,464	31,065	29,742
Malaysia	Value	17,760	16,441	17,702
Canada	Value	9,935	12,387	18,174
Netherlands	Value	10,977	11,206	11,476
All other exporters	Value	83,413	97,773	83,400
All reporting exporters	Value	568,890	631,553	660,984
United States	Share	3.6	3.1	3.2
China	Share	21.9	21.1	22.6
India	Share	1.1	1.2	1.9
Vietnam	Share	11.2	9.8	13.5
Subject exporters	Share	34.1	32.1	38.1
Mexico	Share	12.1	12.4	12.0
Germany	Share	10.4	9.9	9.0
Poland	Share	7.3	9.1	7.9
Czech Republic	Share	6.2	6.6	5.5
France	Share	4.8	4.9	4.5
Malaysia	Share	3.1	2.6	2.7
Canada	Share	1.7	2.0	2.7
Netherlands	Share	1.9	1.8	1.7
All other exporters	Share	14.7	15.5	12.6
All reporting exporters	Share	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 4820.30 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed July 17, 2023.

Note: United States is shown at the top followed by the countries under investigation, all remaining top exporting countries in descending order of 2022 data. HS subheading 4820.30 is a basket category that contains products that are outside the scope of these investigations.



Table VII-20 presents Mexico's exports. Mexico's exports almost exclusively went to the United States.<sup>30</sup>

**Table VII-20**  
**Binders (other than book covers) and folders and file covers, of paper or paperboard: Exports from Mexico, by destination market and period**

Value in 1,000 dollars; share in percent

Destination market	Measure	2020	2021	2022
United States	Value	68,180	78,205	79,188
Canada	Value	---	---	214
Guatemala	Value	51	44	110
El Salvador	Value	21	17	28
Nicaragua	Value	7	---	19
Costa Rica	Value	110	14	15
Panama	Value	376	40	19
Honduras	Value	23	13	8
Jamaica	Value	---	5	14
All other destination markets	Value	62	15	5
All destination markets	Value	68,829	78,354	79,619
United States	Share	99.1	99.8	99.5
Canada	Share	---	---	0.3
Guatemala	Share	0.1	0.1	0.1
El Salvador	Share	0.0	0.0	0.0
Nicaragua	Share	0.0	0.0	0.0
Costa Rica	Share	0.2	0.0	0.0
Panama	Share	0.5	0.1	0.0
Honduras	Share	0.0	0.0	0.0
Jamaica	Share	---	0.0	0.0
All other destination markets	Share	0.1	0.0	0.0
All destination markets	Share	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 4820.30 as reported by INEGI in the Global Trade Atlas database, accessed July 17, 2023.

Note: United States is shown at the top, all remaining top export destinations shown in descending order of 2022 data. HS subheading 4820.30 is a basket category that contains products that are outside the scope of these investigations.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

<sup>30</sup> TOPS makes paper file folders in Mexico. Petitioners believes that the majority of U.S. imports from Mexico are TOPS products. Petitioner's postconference brief, p. 5. \*\*\* Petitioners' postconference brief, Exhibit 1, p. 2. \*\*\* Petitioners' postconference brief, Exhibit 1, p. 7.



**APPENDIX A**  
**FEDERAL REGISTER NOTICES**



The Commission makes available notices relevant to its investigations and reviews on its website, [www.usitc.gov](http://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
87 FR 63526, October 19, 2022	<i>Paper File Folders From China, India, and Vietnam; Institution of Anti-Dumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2022-10-19/pdf/2022-22676.pdf">https://www.govinfo.gov/content/pkg/FR-2022-10-19/pdf/2022-22676.pdf</a>
87 FR 67441, November 8, 2022	<i>Paper File Folders From the People's Republic of China, India, and the Socialist Republic of Vietnam: Initiation of Less-Than-Fair-Value Investigations</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2022-11-08/pdf/2022-24316.pdf">https://www.govinfo.gov/content/pkg/FR-2022-11-08/pdf/2022-24316.pdf</a>
87 FR 67447, November 8, 2022	<i>Paper File Folders From India: Initiation of Countervailing Duty Investigation</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2022-11-08/pdf/2022-24315.pdf">https://www.govinfo.gov/content/pkg/FR-2022-11-08/pdf/2022-24315.pdf</a>
87 FR 74167, December 2, 2022	<i>Paper File Folders From China, India, and Vietnam</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2022-12-02/pdf/2022-26218.pdf">https://www.govinfo.gov/content/pkg/FR-2022-12-02/pdf/2022-26218.pdf</a>
88 FR 16590, March 20, 2023	<i>Paper File Folders From India: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With the Final Antidumping Duty Determination</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2023-03-20/pdf/2023-05553.pdf">https://www.govinfo.gov/content/pkg/FR-2023-03-20/pdf/2023-05553.pdf</a>
88 FR 31485, May 17, 2023	<i>Paper File Folders From the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2023-05-17/pdf/2023-10484.pdf">https://www.govinfo.gov/content/pkg/FR-2023-05-17/pdf/2023-10484.pdf</a>

Citation	Title	Link
88 FR 31488, May 17, 2023	<i>Paper File Folders From the Socialist Republic of Vietnam: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2023-05-17/pdf/2023-10483.pdf">https://www.govinfo.gov/content/pkg/FR-2023-05-17/pdf/2023-10483.pdf</a>
88 FR 31490, May 17, 2023	<i>Paper File Folders From India: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2023-05-17/pdf/2023-10482.pdf">https://www.govinfo.gov/content/pkg/FR-2023-05-17/pdf/2023-10482.pdf</a>
88 FR 34827, May 31, 2023	<i>Paper File Folders From the People's Republic of China: Postponement of Final Determination in the Less-Than-Fair-Value Investigation</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2023-05-31/pdf/2023-11474.pdf">https://www.govinfo.gov/content/pkg/FR-2023-05-31/pdf/2023-11474.pdf</a>
88 FR 37579, June 8, 2023	<i>Paper File Folders From China, India, and Vietnam; Scheduling of the Final Phase of Countervailing Duty and Anti-Dumping Duty Investigations</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2023-06-08/pdf/2023-12251.pdf">https://www.govinfo.gov/content/pkg/FR-2023-06-08/pdf/2023-12251.pdf</a>
88 FR 39825, June 20, 2023	<i>Paper File Folders From the Socialist Republic of Vietnam: Amended Preliminary Determination of Less-Than-Fair-Value Investigation</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2023-06-20/pdf/2023-13014.pdf">https://www.govinfo.gov/content/pkg/FR-2023-06-20/pdf/2023-13014.pdf</a>
88 FR 68670, October 4, 2023	<i>Paper File Folders From China, India, and Vietnam; Cancellation of Hearing for Antidumping and Countervailing Duty Investigations</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2023-10-04/pdf/2023-22055.pdf">https://www.govinfo.gov/content/pkg/FR-2023-10-04/pdf/2023-22055.pdf</a>

Citation	Title	Link
88 FR 69141, October 5, 2023	<i>Paper File Folders From the People's Republic of China: Final Affirmative Determination of Sales at Less-Than-Fair Value</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2023-10-05/pdf/2023-22195.pdf">https://www.govinfo.gov/content/pkg/FR-2023-10-05/pdf/2023-22195.pdf</a>
88 FR 69138, October 5, 2023	<i>Paper File Folders From India: Final Affirmative Determination of Sales at Less Than Fair Value</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2023-10-05/pdf/2023-22194.pdf">https://www.govinfo.gov/content/pkg/FR-2023-10-05/pdf/2023-22194.pdf</a>
88 FR 69130, October 5, 2023	<i>Paper File Folders From the Socialist Republic of Vietnam: Final Affirmative Determination of Sales at Less-Than-Fair-Value Investigation</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2023-10-05/pdf/2023-22196.pdf">https://www.govinfo.gov/content/pkg/FR-2023-10-05/pdf/2023-22196.pdf</a>
88 FR 69134, October 5, 2023	<i>Paper File Folders From India: Final Affirmative Countervailing Duty Determination</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2023-10-05/pdf/2023-22197.pdf">https://www.govinfo.gov/content/pkg/FR-2023-10-05/pdf/2023-22197.pdf</a>





**APPENDIX B**

**FEDERAL REGISTER NOTICE: CANCELLATION OF HEARING**



Thursday, October 19, 2023. Requests to appear at the conference should be emailed to [preliminaryconferences@usitc.gov](mailto:preliminaryconferences@usitc.gov) (DO NOT FILE ON EDIS) on or before October 17, 2023. Please provide an email address for each conference participant in the email. Information on conference procedures, format, and participation will be available on the Commission's Public Calendar. A nonparty who has testimony that may aid the Commission's deliberations may request permission to participate by submitting a short statement.

Please note the Secretary's Office will accept only electronic filings during this time. Filings must be made through the Commission's Electronic Document Information System (EDIS, <https://edis.usitc.gov>). No in-person paper-based filings or paper copies of any electronic filings will be accepted until further notice.

**Written submissions.**—As provided in §§ 201.8 and 207.15 of the Commission's rules, any person may submit to the Commission on or before 5:15 p.m. on October 24, 2023, a written brief containing information and arguments pertinent to the subject matter of the investigations. Parties shall file written testimony and supplementary material in connection with their presentation at the conference no later than noon on October 18, 2023. All written submissions must conform with the provisions of § 201.8 of the Commission's rules; any submissions that contain BPI must also conform with the requirements of §§ 201.6, 207.3, and 207.7 of the Commission's rules. The Commission's *Handbook on Filing Procedures*, available on the Commission's website at [https://www.usitc.gov/documents/handbook\\_on\\_filing\\_procedures.pdf](https://www.usitc.gov/documents/handbook_on_filing_procedures.pdf), elaborates upon the Commission's procedures with respect to filings.

In accordance with §§ 201.16(c) and 207.3 of the rules, each document filed by a party to the investigations must be served on all other parties to the investigations (as identified by either the public or BPI service list), and a certificate of service must be timely filed. The Secretary will not accept a document for filing without a certificate of service.

**Certification.**—Pursuant to § 207.3 of the Commission's rules, any person submitting information to the Commission in connection with these investigations must certify that the information is accurate and complete to the best of the submitter's knowledge. In making the certification, the submitter will acknowledge that any information that it submits to the Commission during these investigations may be

disclosed to and used: (i) by the Commission, its employees and Offices, and contract personnel (a) for developing or maintaining the records of these or related investigations or reviews, or (b) in internal investigations, audits, reviews, and evaluations relating to the programs, the personnel, and operations of the Commission including under 5 U.S.C. Appendix 3; or (ii) by U.S. government employees and contract personnel, solely for cybersecurity purposes. All contract personnel will sign appropriate nondisclosure agreements.

**Authority:** These investigations are being conducted under authority of title VII of the Tariff Act of 1930; this notice is published pursuant to § 207.12 of the Commission's rules.

By order of the Commission.

Issued: September 28, 2023.

**Lisa Barton,**

*Secretary to the Commission.*

[FR Doc. 2023–21930 Filed 10–3–23; 8:45 am]

**BILLING CODE 7020–02–P**

## INTERNATIONAL TRADE COMMISSION

[Investigation Nos. 701–TA–683 and 731–TA–1594–1596 (Final)]

### Paper File Folders From China, India, and Vietnam; Cancellation of Hearing for Antidumping and Countervailing Duty Investigations

**AGENCY:** United States International Trade Commission.

**ACTION:** Notice.

**DATES:** September 28, 2023.

#### FOR FURTHER INFORMATION CONTACT:

Calvin Chang ((202) 205–3062), 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 these investigations may be viewed on the Commission's electronic docket (EDIS) at <http://edis.usitc.gov>.

**SUPPLEMENTARY INFORMATION:** On May 17, 2023, the Commission established a schedule for the final phase of the antidumping and countervailing duty investigations (88 FR 37579, June 8,

2023). On September 27, 2023, counsel for Coalition of Domestic Folder Manufacturers filed a request to appear at the hearing. No other parties submitted a request to appear at the hearing. On September 28, 2023, counsel for the Coalition of Domestic Folder Manufacturers filed a request that the Commission cancel the scheduled hearing for these investigations and withdrew its request to appear at the hearing. Counsel indicated a willingness to respond to any Commission questions in lieu of an actual hearing. Consequently, the public hearing in connection with these investigations, scheduled to begin at 9:30 a.m. on Tuesday, October 3, 2023, is cancelled. Parties to these investigations should respond to any written questions posed by the Commission in their posthearing briefs, which are due to be filed on October 11, 2023.

For further information concerning these investigations see the Commission's notice cited above and the Commission's Rules of Practice and Procedure, part 201, subparts A and B (19 CFR part 201), and part 207, subparts A, D, E, and F (19 CFR part 207).

**Authority:** These investigations are being conducted under authority of title VII of the Tariff Act of 1930; this notice is published pursuant to § 207.21 of the Commission's rules.

By order of the Commission.

Issued: September 29, 2023.

**Lisa Barton,**

*Secretary to the Commission.*

[FR Doc. 2023–22055 Filed 10–3–23; 8:45 am]

**BILLING CODE 7020–02–P**

## INTERNATIONAL TRADE COMMISSION

[Investigation No. 731–TA–1103 (Third Review)]

### Certain Activated Carbon From China; Scheduling of an Expedited Five-Year Review

**AGENCY:** United States International Trade Commission.

**ACTION:** Notice.

**SUMMARY:** The Commission hereby gives notice of the scheduling of an expedited review pursuant to the Tariff Act of 1930 (“the Act”) to determine whether revocation of the antidumping duty order on certain activated carbon from China would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.



**APPENDIX C**  
**SUMMARY DATA**



Table C-1

Paper file folders: Summary data concerning the U.S. market, by item and period

Quantity=1,000 folders; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per 1,000 folders; Period changes=percent--exceptions noted

Item	Reported data					Period changes			
	Calendar year			Jan-Jun		Comparison years			Jan-Jun
	2020	2021	2022	2022	2023	2020-22	2020-21	2021-22	2022-23
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers' share (fn1).....	***	***	***	***	***	▼***	▲***	▼***	▼***
Importers' share (fn1):									
China.....	***	***	***	***	***	▼***	▼***	▼***	▼***
India.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Vietnam.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Mexico.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All other sources.....	***	***	***	***	***	▲***	***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All import sources.....	***	***	***	***	***	▲***	▼***	▲***	▲***
U.S. consumption value:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Producers' share (fn1).....	***	***	***	***	***	▼***	▲***	▼***	▼***
Importers' share (fn1):									
China.....	***	***	***	***	***	▼***	▼***	▲***	▼***
India.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Vietnam.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Mexico.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All other sources.....	***	***	***	***	***	▲***	***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All import sources.....	***	***	***	***	***	▲***	▼***	▲***	▲***
U.S. importers' U.S. shipments of imports from:									
China:									
Quantity.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▼***	▲***	▼***	▼***
India:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Vietnam:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Subject sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Mexico:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All other sources:									
Quantity.....	***	***	***	***	***	▲***	***	▲***	▼***
Value.....	***	***	***	***	***	▲***	***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	▲***
Nonsubject sources:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***

Table continued.

Table C-1 Continued

Paper file folders: Summary data concerning the U.S. market, by item and period

Quantity=1,000 folders; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per 1,000 folders; Period changes=percent--exceptions noted

Item	Reported data					Period changes			
	Calendar year			Jan-Jun		Comparison years			Jan-Jun
	2020	2021	2022	2022	2023	2020-22	2020-21	2021-22	2022-23
U.S. producers:									
Practical capacity quantity.....	***	***	***	***	***	▼***	▼***	***	***
Production quantity.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Capacity utilization (fn1).....	***	***	***	***	***	▼***	▲***	▼***	▼***
U.S. shipments:									
Quantity.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Export shipments:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Inventories/total shipments (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Production workers.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Hours worked (1,000s).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Wages paid (\$1,000).....	***	***	***	***	***	▼***	▲***	▼***	▼***
Hourly wages (dollars per hour).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Productivity (folders per hour).....	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit labor costs.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Net sales:									
Quantity.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Cost of goods sold (COGS).....	***	***	***	***	***	▲***	▲***	▼***	▼***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▲***	▲***
SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit COGS.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▲***
COGS/sales (fn1).....	***	***	***	***	***	▼***	▲***	▼***	▼***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Capital expenditures.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Research and development expenses.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Net assets.....	***	***	***	***	***	▲***	▲***	▼***	***

Source: Compiled from data submitted in response to Commission questionnaires. Value data reflect landed duty-paid values. 508-compliant tables containing these data are contained in parts III, IV, VI, and VII of this report.

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.



**APPENDIX D**

**ADDITIONAL U.S. IMPORT DATA**



**Table D-1**  
**Paper File Folders: U.S. imports on a weight basis, by source and period**

Quantity in 1,000 pounds, unit value in dollars per 1,000 pounds, share in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
China	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Mexico	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
China	Unit value	***	***	***	***	***
India	Unit value	***	***	***	***	***
Vietnam	Unit value	***	***	***	***	***
Subject sources	Unit value	***	***	***	***	***
Mexico	Unit value	***	***	***	***	***
All other sources	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	***	***	***	***	***
China	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Mexico	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

**Figure D-1**  
**Paper file folders: U.S. imports on a weight basis, by source and period**

\* \* \* \* \*

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

**Table D-2**  
**Paper File Folders: Adjusted U.S. imports on a weight basis, by source and period**

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per 1,000 pounds

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
China	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Mexico	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
China	Value	***	***	***	***	***
India	Value	***	***	***	***	***
Vietnam	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Mexico	Value	***	***	***	***	***
All other sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
China	Unit value	***	***	***	***	***
India	Unit value	***	***	***	***	***
Vietnam	Unit value	***	***	***	***	***
Subject sources	Unit value	***	***	***	***	***
Mexico	Unit value	***	***	***	***	***
All other sources	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	***	***	***	***	***

Table continued.

**Table D-2 Continued**  
**Paper File Folders: Adjusted U.S. imports on a weight basis, by source and period**

Share in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
China	Share of quantity	***	***	***	***	***
India	Share of quantity	***	***	***	***	***
Vietnam	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	***	***	***	***	***
Mexico	Share of quantity	***	***	***	***	***
All other sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
China	Share of value	***	***	***	***	***
India	Share of value	***	***	***	***	***
Vietnam	Share of value	***	***	***	***	***
Subject sources	Share of value	***	***	***	***	***
Mexico	Share of value	***	***	***	***	***
All other sources	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires and adjusted official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting number 4820.30.0040, accessed July 13, 2023. Imports are based on the imports for consumption data series.

Note: Official U.S. import statistics were adjusted to remove out-of-scope imports classified under HTS statistical reporting number 4820.30.0040 and add in-scope imports classified under other HTS statistical reporting numbers as reported in responses to Commission questionnaires.

**Table D-3**  
**Paper file folders: U.S. imports in the twelve-month period preceding the filing of the petitions, October 2021 through September 2022**

<b>Source of imports</b>	<b>Official import statistics (1,000 pounds)</b>	<b>Share of quantity (percent)</b>	<b>Questionnaire data (1,000 pounds)</b>	<b>Share of quantity (percent)</b>
China	14,115	15.7	***	***
India	10,261	11.4	***	***
Vietnam	30,930	34.4	***	***
Mexico	31,780	35.3	***	***
All other sources	2,819	3.1	***	***
All import sources	89,905	100.0	***	100.0

Source: Compiled from data submitted in response to Commission questionnaires and adjusted official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting number 4820.30.0040, accessed July 13, 2023. Imports are based on the imports for consumption data series.





**APPENDIX E**

**U.S. SHIPMENTS BY PRODUCT TYPE**



**Table E-1**  
**Paper file folders: U.S. producers' and U.S. importers' U.S. shipments by source and product type,**  
**2022**

Quantity in 1,000 folders

Source	Measure	Manila	Hanging	Fastener	Expanding	Other	All product types
U.S. producers	1,000 folders	***	***	***	***	***	***
China	1,000 folders	***	***	***	***	***	***
India	1,000 folders	***	***	***	***	***	***
Vietnam	1,000 folders	***	***	***	***	***	***
Subject sources	1,000 folders	***	***	***	***	***	***
Mexico	1,000 folders	***	***	***	***	***	***
All other sources	1,000 folders	***	***	***	***	***	***
Nonsubject sources	1,000 folders	***	***	***	***	***	***
All import sources	1,000 folders	***	***	***	***	***	***
All sources	1,000 folders	***	***	***	***	***	***

Table continued.

**Table E-1 Continued**  
**Paper file folders: U.S. producers' and U.S. importers' U.S. shipments by source and product type, 2022**

Quantity in 1,000 pounds

Source	Measure	Manila	Hanging	Fastener	Expanding	Other	All product types
U.S. producers	1,000 pounds	***	***	***	***	***	***
China	1,000 pounds	***	***	***	***	***	***
India	1,000 pounds	***	***	***	***	***	***
Vietnam	1,000 pounds	***	***	***	***	***	***
Subject sources	1,000 pounds	***	***	***	***	***	***
Mexico	1,000 pounds	***	***	***	***	***	***
All other sources	1,000 pounds	***	***	***	***	***	***
Nonsubject sources	1,000 pounds	***	***	***	***	***	***
All import sources	1,000 pounds	***	***	***	***	***	***
All sources	1,000 pounds	***	***	***	***	***	***

Table continued.

**Table E-1 Continued**  
**Paper file folders: U.S. producers' and U.S. importers' U.S. shipments by source and product type, 2022**

Value in 1,000 dollars

Source	Measure	Manila	Hanging	Fastener	Expanding	Other	All product types
U.S. producers	Value	***	***	***	***	***	***
China	Value	***	***	***	***	***	***
India	Value	***	***	***	***	***	***
Vietnam	Value	***	***	***	***	***	***
Subject sources	Value	***	***	***	***	***	***
Mexico	Value	***	***	***	***	***	***
All other sources	Value	***	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***	***
All import sources	Value	***	***	***	***	***	***
All sources	Value	***	***	***	***	***	***

Table continued.

**Table E-1 Continued**  
**Paper file folders: U.S. producers' and U.S. importers' U.S. shipments by source and product type, 2022**

Unit value in dollars per 1,000 folders

Source	Measure	Manila	Hanging	Fastener	Expanding	Other	All product types
U.S. producers	Dollars per 1,000 folders	***	***	***	***	***	***
China	Dollars per 1,000 folders	***	***	***	***	***	***
India	Dollars per 1,000 folders	***	***	***	***	***	***
Vietnam	Dollars per 1,000 folders	***	***	***	***	***	***
Subject sources	Dollars per 1,000 folders	***	***	***	***	***	***
Mexico	Dollars per 1,000 folders	***	***	***	***	***	***
All other sources	Dollars per 1,000 folders	***	***	***	***	***	***
Nonsubject sources	Dollars per 1,000 folders	***	***	***	***	***	***
All import sources	Dollars per 1,000 folders	***	***	***	***	***	***
All sources	Dollars per 1,000 folders	***	***	***	***	***	***

Table continued.

**Table E-1 Continued**  
**Paper file folders: U.S. producers' and U.S. importers' U.S. shipments by source and product type, 2022**

Unit value in dollars per 1,000 pounds

Source	Measure	Manila	Hanging	Fastener	Expanding	Other	All product types
U.S. producers	Dollars per 1,000 pounds	***	***	***	***	***	***
China	Dollars per 1,000 pounds	***	***	***	***	***	***
India	Dollars per 1,000 pounds	***	***	***	***	***	***
Vietnam	Dollars per 1,000 pounds	***	***	***	***	***	***
Subject sources	Dollars per 1,000 pounds	***	***	***	***	***	***
Mexico	Dollars per 1,000 pounds	***	***	***	***	***	***
All other sources	Dollars per 1,000 pounds	***	***	***	***	***	***
Nonsubject sources	Dollars per 1,000 pounds	***	***	***	***	***	***
All import sources	Dollars per 1,000 pounds	***	***	***	***	***	***
All sources	Dollars per 1,000 pounds	***	***	***	***	***	***

Table continued.

**Table E-1 Continued**  
**Paper file folders: U.S. producers' and U.S. importers' U.S. shipments by source and product type, 2022**

Share across in percent

Source	Measure	Manila	Hanging	Fastener	Expanding	Other	All product types
U.S. producers	Share of 1,000 folders	***	***	***	***	***	100.0
China	Share of 1,000 folders	***	***	***	***	***	100.0
India	Share of 1,000 folders	***	***	***	***	***	100.0
Vietnam	Share of 1,000 folders	***	***	***	***	***	100.0
Subject sources	Share of 1,000 folders	***	***	***	***	***	100.0
Mexico	Share of 1,000 folders	***	***	***	***	***	100.0
All other sources	Share of 1,000 folders	***	***	***	***	***	100.0
Nonsubject sources	Share of 1,000 folders	***	***	***	***	***	100.0
All import sources	Share of 1,000 folders	***	***	***	***	***	100.0
All sources	Share of 1,000 folders	***	***	***	***	***	100.0

Table continued.



**Table E-1 Continued**  
**Paper file folders: U.S. producers' and U.S. importers' U.S. shipments by source and product type, 2022**

Share across in percent

Source	Measure	Manila	Hanging	Fastener	Expanding	Other	All product types
U.S. producers	Share of 1,000 pounds	***	***	***	***	***	100.0
China	Share of 1,000 pounds	***	***	***	***	***	100.0
India	Share of 1,000 pounds	***	***	***	***	***	100.0
Vietnam	Share of 1,000 pounds	***	***	***	***	***	100.0
Subject sources	Share of 1,000 pounds	***	***	***	***	***	100.0
Mexico	Share of 1,000 pounds	***	***	***	***	***	100.0
All other sources	Share of 1,000 pounds	***	***	***	***	***	100.0
Nonsubject sources	Share of 1,000 pounds	***	***	***	***	***	100.0
All import sources	Share of 1,000 pounds	***	***	***	***	***	100.0
All sources	Share of 1,000 pounds	***	***	***	***	***	100.0

Table continued.

**Table E-1 Continued**  
**Paper file folders: U.S. producers' and U.S. importers' U.S. shipments by source and product type, 2022**

Share across in percent

Source	Measure	Manila	Hanging	Fastener	Expanding	Other	All product types
U.S. producers	Share of value	***	***	***	***	***	100.0
China	Share of value	***	***	***	***	***	100.0
India	Share of value	***	***	***	***	***	100.0
Vietnam	Share of value	***	***	***	***	***	100.0
Subject sources	Share of value	***	***	***	***	***	100.0
Mexico	Share of value	***	***	***	***	***	100.0
All other sources	Share of value	***	***	***	***	***	100.0
Nonsubject sources	Share of value	***	***	***	***	***	100.0
All import sources	Share of value	***	***	***	***	***	100.0
All sources	Share of value	***	***	***	***	***	100.0

Table continued.

**Table E-1 Continued**  
**Paper file folders: U.S. producers' and U.S. importers' U.S. shipments by source and product type, 2022**

Share down in percent

Source	Measure	Manila	Hanging	Fastener	Expanding	Other	All product types
U.S. producers	Share of 1,000 folders	***	***	***	***	***	***
China	Share of 1,000 folders	***	***	***	***	***	***
India	Share of 1,000 folders	***	***	***	***	***	***
Vietnam	Share of 1,000 folders	***	***	***	***	***	***
Subject sources	Share of 1,000 folders	***	***	***	***	***	***
Mexico	Share of 1,000 folders	***	***	***	***	***	***
All other sources	Share of 1,000 folders	***	***	***	***	***	***
Nonsubject sources	Share of 1,000 folders	***	***	***	***	***	***
All import sources	Share of 1,000 folders	***	***	***	***	***	***
All sources	Share of 1,000 folders	100.0	100.0	100.0	100.0	100.0	***

Table continued.

**Table E-1 Continued**  
**Paper file folders: U.S. producers' and U.S. importers' U.S. shipments by source and product type, 2022**

Share down in percent

Source	Measure	Manila	Hanging	Fastener	Expanding	Other	All product types
U.S. producers	Share of 1,000 pounds	***	***	***	***	***	***
China	Share of 1,000 pounds	***	***	***	***	***	***
India	Share of 1,000 pounds	***	***	***	***	***	***
Vietnam	Share of 1,000 pounds	***	***	***	***	***	***
Subject sources	Share of 1,000 pounds	***	***	***	***	***	***
Mexico	Share of 1,000 pounds	***	***	***	***	***	***
All other sources	Share of 1,000 pounds	***	***	***	***	***	***
Nonsubject sources	Share of 1,000 pounds	***	***	***	***	***	***
All import sources	Share of 1,000 pounds	***	***	***	***	***	***
All sources	Share of 1,000 pounds	100.0	100.0	100.0	100.0	100.0	100.0

Table continued.

**Table E-1 Continued**  
**Paper file folders: U.S. producers' and U.S. importers' U.S. shipments by source and product type, 2022**

Share down in percent

Source	Measure	Manila	Hanging	Fastener	Expanding	Other	All product types
U.S. producers	Share of value	***	***	***	***	***	***
China	Share of value	***	***	***	***	***	***
India	Share of value	***	***	***	***	***	***
Vietnam	Share of value	***	***	***	***	***	***
Subject sources	Share of value	***	***	***	***	***	***
Mexico	Share of value	***	***	***	***	***	***
All other sources	Share of value	***	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***	***
All import sources	Share of value	***	***	***	***	***	***
All sources	Share of value	100.0	100.0	100.0	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. Zeroes, null values, and undefined calculations are suppressed and shown as "---".



**APPENDIX F**

**U.S. SHIPMENTS BY CHANNEL OF DISTRIBUTION AND BRANDING TYPE**





**Table F-1**  
**Paper file folders: Market for branded retail U.S. shipments, by source and period**

Quantity in 1,000 folders, share and ratio in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Mexico	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Mexico	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0
U.S. producers	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
India	Ratio	***	***	***	***	***
Vietnam	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Mexico	Ratio	***	***	***	***	***
All other sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***
All sources	Ratio	***	***	***	***	***

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

Note: Data in this table reflects only U.S. shipments of branded products to retailers.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Table F-2**  
**Paper file folders: Market for private label retail U.S. shipments, by source and period**

Quantity in 1,000 folders, share and ratio in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Mexico	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Mexico	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0
U.S. producers	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
India	Ratio	***	***	***	***	***
Vietnam	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Mexico	Ratio	***	***	***	***	***
All other sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***
All sources	Ratio	***	***	***	***	***

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

Note: Data in this table reflects only U.S. shipments of private-label products to retailers.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Table F-3**  
**Paper file folders: Market for U.S. shipments to distributors and end users, by source and period**

Quantity in 1,000 folders, share and ratio in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Mexico	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Mexico	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0
U.S. producers	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
India	Ratio	***	***	***	***	***
Vietnam	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Mexico	Ratio	***	***	***	***	***
All other sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***
All sources	Ratio	***	***	***	***	***

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

Note: Data in this table reflects only U.S. shipments to distributors and end-users.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".



**APPENDIX G**

**NONSUBJECT COUNTRY PRICE AND PURCHASE COST DATA**



One \*\*\* reported price data and one \*\*\* reported purchase cost data for Mexico for products 1-7. \*\*\* price data accounted for \*\*\* percent of reported U.S. imports from Mexico in 2022. \*\*\* purchase cost data accounted for \*\*\* percent of reported U.S. imports from Mexico in 2022. These price items and accompanying data are comparable to those presented in tables V-3 to V-16. Price and quantity data for Mexico are shown in tables G-1 to G-7 and in figures G-1 to G-7 (with domestic and subject sources). Purchase cost data for Mexico are shown in tables G-8 to G-14 and in figures G-8 to G-14.

In comparing nonsubject country pricing data with U.S. producer pricing data, prices for product imported from Mexico were lower than prices for U.S.-produced product in \*\*\* instances and higher in \*\*\* instances. In comparing nonsubject country purchase cost data with subject country purchase cost data, LDP unit values for product imported from Mexico were lower than unit values for product imported from China in \*\*\* instances, lower than product imported from India in \*\*\* instances, and lower than product imported from Vietnam in \*\*\* instances. LDP unit values for product imported from Mexico were higher than product imported from China in \*\*\* instance, higher than product imported from India in \*\*\* instances, and higher than product imported from Vietnam in \*\*\* instances. A summary of price differentials is presented in table G-15.

**Table G-1****Paper file folders: Weighted-average f.o.b. prices and quantities of domestic and nonsubject imported product 1, by source and quarter, January 2020 – June 2023**

Price in dollars per 1,000 folders, quantity in 1,000 folders.

Period	U.S. price	U.S. quantity	Mexico price	Mexico quantity
2020 Q1	***	***	***	***
2020 Q2	***	***	***	***
2020 Q3	***	***	***	***
2020 Q4	***	***	***	***
2021 Q1	***	***	***	***
2021 Q2	***	***	***	***
2021 Q3	***	***	***	***
2021 Q4	***	***	***	***
2022 Q1	***	***	***	***
2022 Q2	***	***	***	***
2022 Q3	***	***	***	***
2022 Q4	***	***	***	***
2023 Q1	***	***	***	***
2023 Q2	***	***	***	***

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

Note: Product 1: Packages of up to 25 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).



**Table G-2****Paper file folders: Weighted-average f.o.b. prices and quantities of domestic and nonsubject imported product 2, by source and quarter, January 2020 – June 2023**

Price in dollars per 1,000 folders, quantity in 1,000 folders.

Period	U.S. price	U.S. quantity	Mexico price	Mexico quantity
2020 Q1	***	***	***	***
2020 Q2	***	***	***	***
2020 Q3	***	***	***	***
2020 Q4	***	***	***	***
2021 Q1	***	***	***	***
2021 Q2	***	***	***	***
2021 Q3	***	***	***	***
2021 Q4	***	***	***	***
2022 Q1	***	***	***	***
2022 Q2	***	***	***	***
2022 Q3	***	***	***	***
2022 Q4	***	***	***	***
2023 Q1	***	***	***	***
2023 Q2	***	***	***	***

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

Note: Product 2: Boxes of 75 to 99 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: \*\*\*.

**Table G-3****Paper file folders: Weighted-average f.o.b. prices and quantities of domestic and nonsubject imported product 3, by source and quarter, January 2020 – June 2023**

Price in dollars per 1,000 folders, quantity in 1,000 folders.

Period	U.S. price	U.S. quantity	Mexico price	Mexico quantity
2020 Q1	***	***	***	***
2020 Q2	***	***	***	***
2020 Q3	***	***	***	***
2020 Q4	***	***	***	***
2021 Q1	***	***	***	***
2021 Q2	***	***	***	***
2021 Q3	***	***	***	***
2021 Q4	***	***	***	***
2022 Q1	***	***	***	***
2022 Q2	***	***	***	***
2022 Q3	***	***	***	***
2022 Q4	***	***	***	***
2023 Q1	***	***	***	***
2023 Q2	***	***	***	***

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

Note: Product 3: Boxes of 100 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

**Table G-4**  
**Paper file folders: Weighted-average f.o.b. prices and quantities of domestic and nonsubject imported product 4, by source and quarter, January 2020 – June 2023**

Price in dollars per 1,000 folders, quantity in 1,000 folders.

Period	U.S. price	U.S. quantity	Mexico price	Mexico quantity
2020 Q1	***	***	***	***
2020 Q2	***	***	***	***
2020 Q3	***	***	***	***
2020 Q4	***	***	***	***
2021 Q1	***	***	***	***
2021 Q2	***	***	***	***
2021 Q3	***	***	***	***
2021 Q4	***	***	***	***
2022 Q1	***	***	***	***
2022 Q2	***	***	***	***
2022 Q3	***	***	***	***
2022 Q4	***	***	***	***
2023 Q1	***	***	***	***
2023 Q2	***	***	***	***

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

Note: Product 4: Boxes of 125 to 150 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

**Table G-5**  
**Paper file folders: Weighted-average f.o.b. prices and quantities of domestic and nonsubject imported product 5, by source and quarter, January 2020 – June 2023**

Price in dollars per 1,000 folders, quantity in 1,000 folders.

Period	U.S. price	U.S. quantity	Mexico price	Mexico quantity
2020 Q1	***	***	***	***
2020 Q2	***	***	***	***
2020 Q3	***	***	***	***
2020 Q4	***	***	***	***
2021 Q1	***	***	***	***
2021 Q2	***	***	***	***
2021 Q3	***	***	***	***
2021 Q4	***	***	***	***
2022 Q1	***	***	***	***
2022 Q2	***	***	***	***
2022 Q3	***	***	***	***
2022 Q4	***	***	***	***
2023 Q1	***	***	***	***
2023 Q2	***	***	***	***

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

Note: Product 5: Boxes of 250 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: \*\*\*.

**Table G-6****Paper file folders: Weighted-average f.o.b. prices and quantities of domestic and nonsubject imported product 6, by source and quarter, January 2020 – June 2023**

Price in dollars per 1,000 folders, quantity in 1,000 folders.

Period	U.S. price	U.S. quantity	Mexico price	Mexico quantity
2020 Q1	***	***	***	***
2020 Q2	***	***	***	***
2020 Q3	***	***	***	***
2020 Q4	***	***	***	***
2021 Q1	***	***	***	***
2021 Q2	***	***	***	***
2021 Q3	***	***	***	***
2021 Q4	***	***	***	***
2022 Q1	***	***	***	***
2022 Q2	***	***	***	***
2022 Q3	***	***	***	***
2022 Q4	***	***	***	***
2023 Q1	***	***	***	***
2023 Q2	***	***	***	***

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

Note: Product 6: Boxes of 20 to 25 hanging file folders, standard green color, letter size, made from uncoated freesheet paperboard, 11 points thickness, 126 to 144 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), metal rod with small indentations or hooks on the end, and the ends of the rods coated. The box also contains the same number of plastic tabs, each of which is 1/5 cut size, and white paper inserts as the box size.

Note: \*\*\*.

**Table G-7**  
**Paper file folders: Weighted-average f.o.b. prices and quantities of domestic and nonsubject imported product 7, by source and quarter, January 2020 – June 2023**

Price in dollars per 1,000 folders, quantity in 1,000 folders.

Period	U.S. price	U.S. quantity	Mexico price	Mexico quantity
2020 Q1	***	***	***	***
2020 Q2	***	***	***	***
2020 Q3	***	***	***	***
2020 Q4	***	***	***	***
2021 Q1	***	***	***	***
2021 Q2	***	***	***	***
2021 Q3	***	***	***	***
2021 Q4	***	***	***	***
2022 Q1	***	***	***	***
2022 Q2	***	***	***	***
2022 Q3	***	***	***	***
2022 Q4	***	***	***	***
2023 Q1	***	***	***	***
2023 Q2	***	***	***	***

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

Note: Product 7: Boxes of up to 50 fastener folders, manila color, letter size, two embedded and stamped 2 inch fasteners, made from uncoated freesheet paperboard, 11 points thickness, 118 to 128 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended reinforced paper tab on the back flap visible above the

**Table G-8****Paper file folders: Import landed duty-paid purchase costs and domestic prices, and quantities of product 1, by source and quarter, January 2020 – June 2023**

Price and unit LDP values in dollars per 1,000 folders, quantity in 1,000 folders.

Period	U.S. price	U.S. quantity	Mexico unit LDP value	Mexico quantity
2020 Q1	***	***	***	***
2020 Q2	***	***	***	***
2020 Q3	***	***	***	***
2020 Q4	***	***	***	***
2021 Q1	***	***	***	***
2021 Q2	***	***	***	***
2021 Q3	***	***	***	***
2021 Q4	***	***	***	***
2022 Q1	***	***	***	***
2022 Q2	***	***	***	***
2022 Q3	***	***	***	***
2022 Q4	***	***	***	***
2023 Q1	***	***	***	***
2023 Q2	***	***	***	***

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

Note: Product 1: Packages of up to 25 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: U.S. producer price data are the same as that presented in table G-1. Reported quantities for Mexico are from purchase cost data.

**Table G-9****Paper file folders: Import landed duty-paid purchase costs and domestic prices, and quantities of product 2, by source and quarter, January 2020 – June 2023**

Price and unit LDP values in dollars per 1,000 folders, quantity in 1,000 folders.

Period	U.S. price	U.S. quantity	Mexico unit LDP value	Mexico quantity
2020 Q1	***	***	***	***
2020 Q2	***	***	***	***
2020 Q3	***	***	***	***
2020 Q4	***	***	***	***
2021 Q1	***	***	***	***
2021 Q2	***	***	***	***
2021 Q3	***	***	***	***
2021 Q4	***	***	***	***
2022 Q1	***	***	***	***
2022 Q2	***	***	***	***
2022 Q3	***	***	***	***
2022 Q4	***	***	***	***
2023 Q1	***	***	***	***
2023 Q2	***	***	***	***

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

Note: Product 2: Boxes of 75 to 99 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: U.S. producer price data are the same as that presented in table G-2. Reported quantities for Mexico are from purchase cost data.

Note: \*\*\*.



**Table G-10****Paper file folders: Import landed duty-paid purchase costs and domestic prices, and quantities of product 3, by source and quarter, January 2020 – June 2023**

Price and unit LDP values in dollars per 1,000 folders, quantity in 1,000 folders.

Period	U.S. price	U.S. quantity	Mexico unit LDP value	Mexico quantity
2020 Q1	***	***	***	***
2020 Q2	***	***	***	***
2020 Q3	***	***	***	***
2020 Q4	***	***	***	***
2021 Q1	***	***	***	***
2021 Q2	***	***	***	***
2021 Q3	***	***	***	***
2021 Q4	***	***	***	***
2022 Q1	***	***	***	***
2022 Q2	***	***	***	***
2022 Q3	***	***	***	***
2022 Q4	***	***	***	***
2023 Q1	***	***	***	***
2023 Q2	***	***	***	***

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

Note: Product 3: Boxes of 100 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: U.S. producer price data are the same as that presented in table G-3. Reported quantities for Mexico are from purchase cost data.

**Table G-11****Paper file folders: Import landed duty-paid purchase costs and domestic prices, and quantities of product 4, by source and quarter, January 2020 – June 2023**

Price and unit LDP values in dollars per 1,000 folders, quantity in 1,000 folders.

Period	U.S. price	U.S. quantity	Mexico unit LDP value	Mexico quantity
2020 Q1	***	***	***	***
2020 Q2	***	***	***	***
2020 Q3	***	***	***	***
2020 Q4	***	***	***	***
2021 Q1	***	***	***	***
2021 Q2	***	***	***	***
2021 Q3	***	***	***	***
2021 Q4	***	***	***	***
2022 Q1	***	***	***	***
2022 Q2	***	***	***	***
2022 Q3	***	***	***	***
2022 Q4	***	***	***	***
2023 Q1	***	***	***	***
2023 Q2	***	***	***	***

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

Note: Product 4: Boxes of 125 to 150 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: U.S. producer price data are the same as that presented in table G-4. Reported quantities for Mexico are from purchase cost data.

Note: \*\*\*.

**Table G-12****Paper file folders: Import landed duty-paid purchase costs and domestic prices, and quantities of product 5, by source and quarter, January 2020 – June 2023**

Price and unit LDP values in dollars per 1,000 folders, quantity in 1,000 folders.

Period	U.S. price	U.S. quantity	Mexico unit LDP value	Mexico quantity
2020 Q1	***	***	***	***
2020 Q2	***	***	***	***
2020 Q3	***	***	***	***
2020 Q4	***	***	***	***
2021 Q1	***	***	***	***
2021 Q2	***	***	***	***
2021 Q3	***	***	***	***
2021 Q4	***	***	***	***
2022 Q1	***	***	***	***
2022 Q2	***	***	***	***
2022 Q3	***	***	***	***
2022 Q4	***	***	***	***
2023 Q1	***	***	***	***
2023 Q2	***	***	***	***

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

Note: Product 5: Boxes of 250 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: U.S. producer price data are the same as that presented in table G-5. Reported quantities for Mexico are from purchase cost data.

**Table G-13****Paper file folders: Import landed duty-paid purchase costs and domestic prices, and quantities of product 6, by source and quarter, January 2020 – June 2023**

Price and unit LDP values in dollars per 1,000 folders, quantity in 1,000 folders.

Period	U.S. price	U.S. quantity	Mexico unit LDP value	Mexico quantity
2020 Q1	***	***	***	***
2020 Q2	***	***	***	***
2020 Q3	***	***	***	***
2020 Q4	***	***	***	***
2021 Q1	***	***	***	***
2021 Q2	***	***	***	***
2021 Q3	***	***	***	***
2021 Q4	***	***	***	***
2022 Q1	***	***	***	***
2022 Q2	***	***	***	***
2022 Q3	***	***	***	***
2022 Q4	***	***	***	***
2023 Q1	***	***	***	***
2023 Q2	***	***	***	***

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

Note: Product 6: Boxes of 20 to 25 hanging file folders, standard green color, letter size, made from uncoated freesheet paperboard, 11 points thickness, 126 to 144 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), metal rod with small indentations or hooks on the end, and the ends of the rods coated. The box also contains the same number of plastic tabs, each of which is 1/5 cut size, and white paper inserts as the box size.

Note: U.S. producer price data are the same as that presented in table G-6. Reported quantities for Mexico are from purchase cost data.

**Table G-14****Paper file folders: Import landed duty-paid purchase costs and domestic prices, and quantities of product 7, by source and quarter, January 2020 – June 2023**

Price and unit LDP values in dollars per 1,000 folders, quantity in 1,000 folders.

Period	U.S. price	U.S. quantity	Mexico unit LDP value	Mexico quantity
2020 Q1	***	***	***	***
2020 Q2	***	***	***	***
2020 Q3	***	***	***	***
2020 Q4	***	***	***	***
2021 Q1	***	***	***	***
2021 Q2	***	***	***	***
2021 Q3	***	***	***	***
2021 Q4	***	***	***	***
2022 Q1	***	***	***	***
2022 Q2	***	***	***	***
2022 Q3	***	***	***	***
2022 Q4	***	***	***	***
2023 Q1	***	***	***	***
2023 Q2	***	***	***	***

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

Note: Product 7: Boxes of up to 50 fastener folders, manila color, letter size, two embedded and stamped 2 inch fasteners, made from uncoated freesheet paperboard, 11 points thickness, 118 to 128 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended reinforced paper tab on the back flap visible above the height of the front flap and one 1/3 reinforced tab in one of three positions (left, center, right).

Note: U.S. producer price data are the same as that presented in table G-7. Reported quantities for Mexico are from purchase cost data.

**Figure G-1**  
**Paper file folders: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by source and quarter, January 2020 – June 2023**

*	*	*	*	*	*	*
*	*	*	*	*	*	*

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

Note: Product 1: Packages of up to 25 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

**Figure G-2**  
**Paper file folders: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by source and quarter, January 2020 – June 2023**

*	*	*	*	*	*	*
*	*	*	*	*	*	*

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

Note: Product 2: Boxes of 75 to 99 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: \*\*\*.

**Figure G-3**  
**Paper file folders: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by source and quarter, January 2020 – June 2023**

*	*	*	*	*	*	*
*	*	*	*	*	*	*

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

Note: Product 3: Boxes of 100 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).



**Figure G-4**  
**Paper file folders: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, by source and quarter, January 2020 – June 2023**



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

Note: Product 4: Boxes of 125 to 150 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

**Figure G-5**  
**Paper file folders: Weighted-average f.o.b. prices and quantities of domestic and imported product 5, by source and quarter, January 2020 – June 2023**

\* \* \* \* \*

\* \* \* \* \*

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

Note: Product 5: Boxes of 250 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: \*\*\*

**Figure G-6**  
**Paper file folders: Weighted-average f.o.b. prices and quantities of domestic and imported product 6, by source and quarter, January 2020 – June 2023**

*	*	*	*	*	*	*
*	*	*	*	*	*	*

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

Note: Product 6: Boxes of 20 to 25 hanging file folders, standard green color, letter size, made from uncoated freesheet paperboard, 11 points thickness, 126 to 144 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), metal rod with small indentations or hooks on the end, and the ends of the rods coated. The box also contains the same number of plastic tabs, each of which is 1/5 cut size, and white paper inserts as the box size.

Note: \*\*\*.

**Figure G-7**  
**Paper file folders: Weighted-average f.o.b. prices and quantities of domestic and imported product 7, by source and quarter, January 2020 – June 2023**



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

Note: Product 7: Boxes of up to 50 fastener folders, manila color, letter size, two embedded and stamped 2 inch fasteners, made from uncoated freesheet paperboard, 11 points thickness, 118 to 128 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended reinforced paper tab on the back flap visible above the height of the front flap and one 1/3 reinforced tab in one of three positions (left, center, right).

**Figure G-8**  
**Paper file folders: U.S. producer prices and import purchase costs, and quantities of domestic and imported product 1, by source and quarter, January 2020 – June 2023**



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

Note: Product 1: Packages of up to 25 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: U.S. producer price data are the same as that presented in figure G-1.

**Figure G-9**

**Paper file folders: U.S. producer prices and import purchase costs, and quantities of domestic and imported product 2, by source and quarter, January 2020 – June 2023**

\* \* \* \* \*

\* \* \* \* \*

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

Note: Product 2: Boxes of 75 to 99 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: U.S. producer price data are the same as that presented in figure G-2.

Note: \*\*\*.

**Figure G-10**

**Paper file folders: U.S. producer prices and import purchase costs, and quantities of domestic and imported product 3, by source and quarter, January 2020 – June 2023**

\* \* \* \* \*

\* \* \* \* \*

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

Note: Product 3: Boxes of 100 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: U.S. producer price data are the same as that presented in figure G-3.

**Figure G-11**

**Paper file folders: U.S. producer prices and import purchase costs, and quantities of domestic and imported product 4, by source and quarter, January 2020 – June 2023**

\* \* \* \* \*

\* \* \* \* \*

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

Note: Product 4: Boxes of 125 to 150 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: U.S. producer price data are the same as that presented in figure G-4.

Note: \*\*\*.



**Figure G-12**

**Paper file folders: U.S. producer prices and import purchase costs, and quantities of domestic and imported product 5, by source and quarter, January 2020 – June 2023**

\* \* \* \* \*

\* \* \* \* \*

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

Note: Product 5: Boxes of 250 file folders, manila color, letter size, made from uncoated freesheet paperboard, 11 point thickness, 101 to 109 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended paper tab on the back flap visible above the height of the front flap for labeling and one 1/3 cut size tab in one of three positions (left, center, right).

Note: U.S. producer price data are the same as that presented in figure G-5.

**Figure G-13**

**Paper file folders: U.S. producer prices and import purchase costs, and quantities of domestic and imported product 6, by source and quarter, January 2020 – June 2023**

\* \* \* \* \*

\* \* \* \* \*

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

Note: Product 6: Boxes of 20 to 25 hanging file folders, standard green color, letter size, made from uncoated freesheet paperboard, 11 points thickness, 126 to 144 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), metal rod with small indentations or hooks on the end, and the ends of the rods coated. The box also contains the same number of plastic tabs, each of which is 1/5 cut size, and white paper inserts as the box size.

Note: U.S. producer price data are the same as that presented in figure G-6.

**Figure G-14**

**Paper file folders: U.S. producer prices and import purchase costs, and quantities of domestic and imported product 7, by source and quarter, January 2020 – June 2023**

The figure consists of two rows of asterisks. The first row contains seven asterisks, and the second row also contains seven asterisks. This indicates that the data for these categories is missing or not reported.

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

Note: Product 7: Boxes of up to 50 fastener folders, manila color, letter size, two embedded and stamped 2 inch fasteners, made from uncoated freesheet paperboard, 11 points thickness, 118 to 128 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste, with an extended reinforced paper tab on the back flap visible above the height of the front flap and one 1/3 reinforced tab in one of three positions (left, center, right).

Note: U.S. producer price data are the same as that presented in figure G-7.

**Table G-15****Paper file folders: Summary of higher/lower unit values for nonsubject price and purchase cost data, by source, January 2020 – June 2023**

Quantity in 1,000 folders

<b>Comparison source</b>	<b>Benchmark source</b>	<b>Number of quarters lower</b>	<b>Quantity lower</b>	<b>Number of quarters higher</b>	<b>Quantity higher</b>
Mexico price	United States price	***	***	***	***
Mexico price	China price	***	***	***	***
Mexico price	India price	***	***	***	***
Mexico price	Vietnam price	***	***	***	***
Mexico cost	United States price	***	***	***	***
Mexico cost	China cost	***	***	***	***
Mexico cost	India cost	***	***	***	***
Mexico cost	Vietnam cost	***	***	***	***

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

