

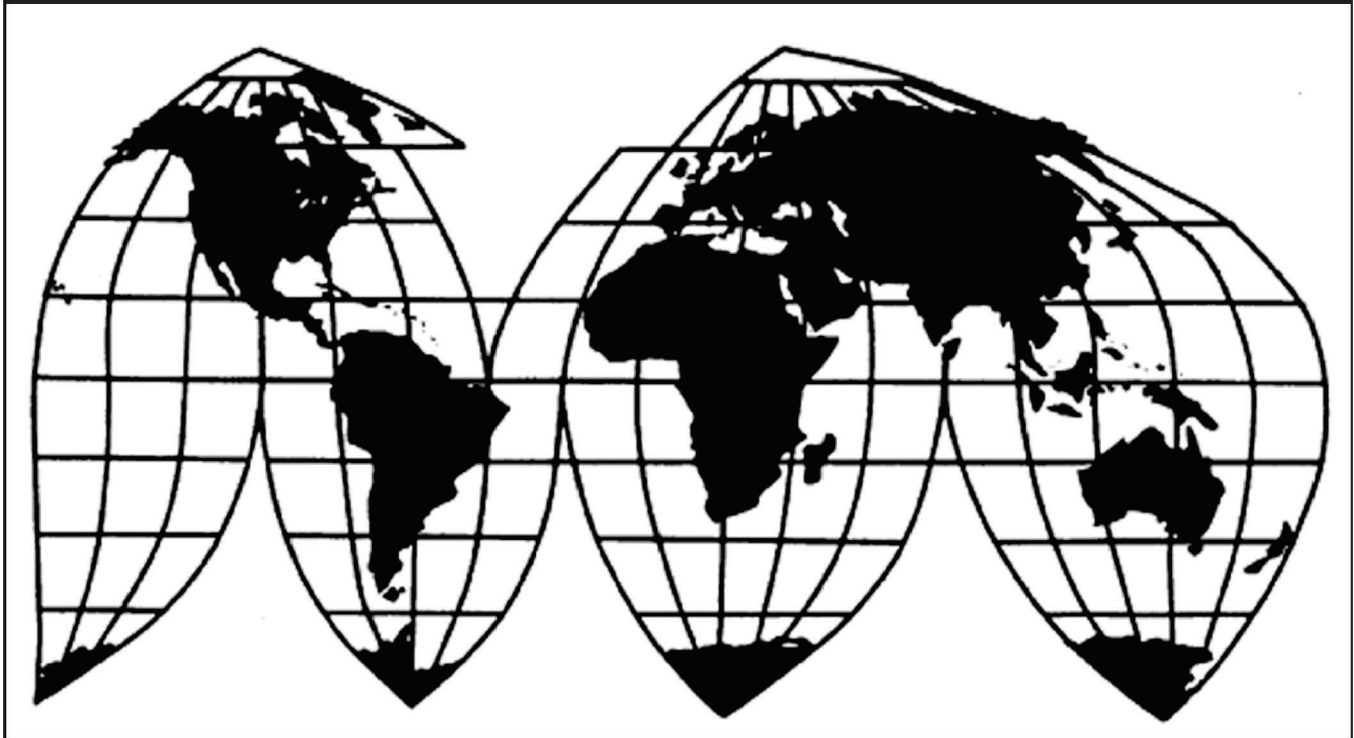
# **Aluminum Extrusions from China, Colombia, Dominican Republic, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, South Korea, Taiwan, Thailand, Turkey, United Arab Emirates, and Vietnam**

Investigation Nos. 701-TA-695-698 and 731-TA-1643-1657 (Preliminary)

**Publication 5477**

**November 2023**

**U.S. International Trade Commission**



Washington, DC 20436

# U.S. International Trade Commission

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# 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Note.—Information that would reveal confidential operations of individual concerns may not be published.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-695-698 and 731-TA-1643-1657 (Preliminary)

Aluminum Extrusions from China, Colombia, Dominican Republic, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, South Korea, Taiwan, Thailand, Turkey, United Arab Emirates, 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 there is a reasonable indication that an industry in the United States is materially injured by reason of imports of aluminum extrusions from China, Colombia, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, South Korea, Taiwan, Thailand, Turkey, United Arab Emirates and Vietnam provided for in subheadings 7604.10.10, 7604.10.30, 7604.10.50, 7604.21.00, 7604.29.10, 7604.29.30, 7604.29.50, 7608.10.00, 7608.20.00, 7609.00.00, 7610.10.00, and 7610.90.00 of the Harmonized Tariff Schedule of the United States, that are alleged to be sold in the United States at less than fair value (“LTFV”) and to be subsidized by the governments of China, Indonesia, and Mexico. The Commission also determines that there is a reasonable indication that an industry in the United States is threatened with material injury by reason of imports of aluminum extrusions from Turkey that are alleged to be subsidized by the government of Turkey.<sup>2</sup>

The Commission further finds that imports of aluminum extrusions from the Dominican Republic that are allegedly sold in the United States at LTFV are negligible pursuant to section 771(24) of the Act, and its investigation with regard to imports from the Dominican Republic is thereby terminated pursuant to section 733(a)(1) of the Act.

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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 74421 and 88 FR 74433 (October 31, 2023).

## **COMMENCEMENT OF FINAL PHASE INVESTIGATIONS**

Pursuant to section 207.18 of the Commission's rules, the Commission also gives notice of the commencement of the final phase of its investigations. The Commission will issue a final phase notice of scheduling, which will be published in the *Federal Register* as provided in § 207.21 of the Commission's rules, upon notice from the U.S. Department of Commerce ("Commerce") of affirmative preliminary determinations in the investigations under §§ 703(b) or 733(b) of the Act, or, if the preliminary determinations are negative, upon notice of affirmative final determinations in those investigations under §§ 705(a) or 735(a) of the Act. Parties that filed entries of appearance in the preliminary phase of the investigations need not enter a separate appearance for the final phase of the investigations. Industrial users, and, if the merchandise under investigation is sold at the retail level, representative consumer organizations have the right to appear as parties in Commission antidumping and countervailing duty investigations. The Secretary will prepare a public service list containing the names and addresses of all persons, or their representatives, who are parties to the investigations.

## **BACKGROUND**

On October 4, 2023, the U.S. Aluminum Extruders Coalition (consisting of Alexandria Extrusion Company, Alexandria, Minnesota; APEL Extrusions Inc., Coburg, Oregon; Bonnell Aluminum, Newnan, Georgia; Brazeway, Adrian, Michigan; Custom Aluminum Products, South Elgin, Illinois; Extrudex Aluminum, North Jackson, Ohio; International Extrusions, Garden City, Michigan; Jordan Aluminum Company, Memphis, Tennessee; M-D Building Products, Oklahoma City, Oklahoma; Merit Aluminum, Corona, California; MI Metals, Oldsmar, Florida; Pennex Aluminum, Wellsville, Pennsylvania; Tower Extrusions, Olney, Texas; and Western Extrusions, Carrollton, Texas) and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, Pittsburgh, Pennsylvania filed petitions with the Commission and Commerce, alleging that an industry in the United States is materially injured or threatened with material injury by reason of subsidized imports of aluminum extrusions from China, Indonesia, Mexico, and Turkey and LTFV imports of aluminum extrusions from China, Colombia, Dominican Republic, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, South Korea, Taiwan, Thailand, Turkey, United Arab Emirates and Vietnam. Accordingly, effective October 4, 2023, the Commission instituted countervailing duty

investigation Nos. 701-TA-695-698 and antidumping duty investigation Nos. 731-TA-1643-1657 (Preliminary).

Notice of the institution of the Commission's investigations and of a public conference to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* of October 13, 2023 (88 FR 71020). The Commission conducted its conference on October 25, 2023. All persons who requested the opportunity were permitted to participate.



## Views of the Commission

Based on the record in the preliminary phase of these investigations, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of aluminum extrusions from China, Colombia, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, South Korea, Taiwan, Thailand, Turkey, the United Arab Emirates (“UAE”), and Vietnam that are allegedly sold in the United States at less than fair value and imports of aluminum extrusions from China, Indonesia, and Mexico that are allegedly subsidized by the governments of China, Indonesia, and Mexico. We also find that there is a reasonable indication that an industry in the United States is threatened with material injury by reason of imports of aluminum extrusions from Turkey that are allegedly subsidized by the government of Turkey. We further determine that imports of aluminum extrusions from the Dominican Republic that are allegedly sold in the United States at less than fair value are negligible and terminate that investigation of imports of aluminum extrusions from the Dominican Republic.

### I. The Legal Standard for Preliminary Determinations

The legal standard for preliminary antidumping and countervailing duty determinations requires the Commission to determine, based upon the information available at the time of the preliminary determinations, whether there is a reasonable indication that a domestic industry is materially injured or threatened with material injury, or that the establishment of an industry is materially retarded, by reason of the allegedly unfairly traded imports.<sup>1</sup> In applying this standard, the Commission weighs the evidence before it and determines whether “(1) the record as a whole contains clear and convincing evidence that there is no material injury or threat of such injury; and (2) no likelihood exists that contrary evidence will arise in a final investigation.”<sup>2</sup>

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<sup>1</sup> 19 U.S.C. §§ 1671b(a), 1673b(a) (2000); see also *American Lamb Co. v. United States*, 785 F.2d 994, 1001-04 (Fed. Cir. 1986); *Aristech Chem. Corp. v. United States*, 20 CIT 353, 354-55 (1996). No party argues that the establishment of an industry in the United States is materially retarded by the allegedly unfairly traded imports.

<sup>2</sup> *American Lamb Co.*, 785 F.2d at 1001; see also *Texas Crushed Stone Co. v. United States*, 35 F.3d 1535, 1543 (Fed. Cir. 1994).

## II. Background

The petitions in these investigations were filed on October 4, 2023, by the U.S. Aluminum Extruders Coalition,<sup>3</sup> consisting of domestic extruders of aluminum, and by the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union (“the USW”), a union representing workers at domestic extruders’ production facilities (collectively, “petitioners”). Petitioning firms Bonnell Aluminum, Brazeway LLC, MI Metals, Western Extrusions, and Custom Aluminum Products and the USW appeared at the staff conference, and petitioners submitted a postconference brief.

Several respondent entities participated in these investigations. The Coalition for Fair Mexican Exports of Aluminum Extrusions (“Mexican Coalition”), an association of producers and exporters of subject merchandise from Mexico, appeared at the staff conference accompanied by counsel and submitted a postconference brief. Hydro Precision Tubing USA, LLC (“Hydro Precision”), a U.S. producer and importer of subject merchandise from Mexico, appeared at the staff conference accompanied by counsel and submitted a postconference brief. Reflection Window + Wall, LLC (“Reflection”), an importer of subject merchandise from Mexico, appeared at the staff conference accompanied by counsel and submitted a postconference brief. MAHLE Behr USA Inc.; MAHLE Behr Charleston Inc.; MAHLE Behr Dayton L.L.C.; MAHLE Behr Service America L.L.C.; MAHLE Behr Manufacturing Management, Inc.; MAHLE Behr Mt. Sterling, Inc.; MAHLE Behr Rio Bravo, S. de R.L. de C.V.; MAHLE Behr Mexico, S. de R.L. de C.V.; and MAHLE Behr Service Mexico, S. de R.L. de C.V. (collectively, “MAHLE”), producers and exporters in Mexico and U.S. importers of subject merchandise, appeared at the staff conference accompanied by counsel and submitted a postconference brief. The Downstream Industry Coalition, consisting of Johnson Controls Inc. (and its affiliates),<sup>4</sup> Danfoss LLC, Streamlight Inc., Bracalente Manufacturing Co., Inc., Enclos Corporation, U.S. importers or purchasers of subject merchandise, and Bracalente Metal Products (Suzhou) Co., Ltd., a producer and exporter of subject merchandise in China, appeared at the staff conference accompanied by counsel and submitted a postconference brief.

The following firms also filed postconference briefs: Aluminio Nacional S.A. and Alumina Distribution Center (collectively, “Aluminio”), a subject producer and exporter in

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<sup>3</sup> The Coalition is comprised of the following 14 extruders of aluminum: Alexandria Extrusion Company; ALPUR; Bonnell Aluminum; Brazeway; Custom Aluminum Products; Extrudex Aluminum; International Extrusions; Jordan Aluminum Company; M-D Building Products, Inc.; Merit Aluminum Corporation; MI Metals; Pennex Aluminum; Tower Extrusions; and Western Extrusions. Petition at 1.

<sup>4</sup> Its affiliates include Air Systems Components Inc., Ruskin Company, York International Corp., and Tyco Fire & Security GmbH.

Colombia and a U.S. importer of subject merchandise from Colombia; A.O. Smith Corporation, a purchaser of aluminum extrusions; Delta Aluminum (Thailand) Co., Ltd. (“Delta”), a producer and exporter of subject merchandise in Thailand; East Asia Aluminum Co., Ltd. (“East Asia”), a producer and exporter of subject merchandise in Vietnam; Kingtom Aluminio S.R.L (“Kingtom”), a producer and exporter of subject merchandise in the Dominican Republic; Press Metal North America Inc. (“Press Metal”), a U.S. importer of subject merchandise from Mexico; and the RV Industry Association (“RVIA”), an association whose members purchase and import aluminum extrusions. The Air-Conditioning, Heating, and Refrigeration Institute (“AHRI”) and the Government of Ecuador filed postconference comments, and a representative of the European Union (“EU”) appeared at the staff conference.

**Data Coverage.** U.S. industry data are based on the questionnaire responses of 29 U.S. domestic producers, accounting for a majority of U.S. production of aluminum extrusions in 2022.<sup>5</sup> U.S. import data are based on adjusted official Commerce import statistics and questionnaire responses from 69 U.S. importers, estimated to have accounted for \*\*\* percent of total subject imports in 2022, including \*\*\* percent of subject imports from China, \*\*\* percent of subject imports from Colombia, \*\*\* percent of subject imports from the Dominican Republic, \*\*\* percent of subject imports from Ecuador, \*\*\* percent of subject imports from India, \*\*\* percent of subject imports from Indonesia, \*\*\* percent of subject imports from Italy, \*\*\* percent of subject imports from Malaysia, \*\*\* percent of subject imports from Mexico, \*\*\* percent of subject imports from South Korea, \*\*\* percent of subject imports from Taiwan, \*\*\* percent of subject imports from Thailand, \*\*\* percent of subject imports from Turkey, \*\*\* percent of subject imports from the UAE, and \*\*\* percent of subject imports from Vietnam. Responding U.S. importers also accounted for \*\*\* percent of nonsubject imports and \*\*\* percent of total imports in 2022.<sup>6</sup>

The Commission received responses to its questionnaires from 50 foreign producers of subject merchandise, including two firms in China, two firms in Colombia, one firm in the Dominican Republic, two firms in Ecuador, one firm in India, five firms in Indonesia, six firms in

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<sup>5</sup> Confidential Staff Report (“CR”)/Public Report (“PR”) at III-1.

<sup>6</sup> CR/PR at IV-2. The percentages reflect the volume of imports reported in importer questionnaire responses for each country source (or sources) as a percentage of official import statistics entering under the primary HTS numbers under which imports are believed to have entered as indicated in Commerce’s scope definition. These data were adjusted using data submitted in Commission questionnaires to identify China subject vs. nonsubject imports, to add in reported in-scope imports under the non-primary HTS statistical reporting numbers, and to remove out-of-scope merchandise. CR/PR at IV-1 n.2.

Italy, six firms in Malaysia, nine firms in Mexico, one firm in Taiwan, five firms in Thailand, five firms in Turkey, one firm in the UAE, and four firms in Vietnam.<sup>7</sup>

### III. Domestic Like Product

In determining whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of imports of the subject merchandise, the Commission first defines the “domestic like product” and the “industry.”<sup>8</sup> Section 771(4)(A) of the Tariff Act of 1930, as amended (“the Tariff Act”), defines the relevant domestic industry as the “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”<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

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<sup>7</sup> CR/PR at VII-3. These firms’ exports are estimated to account for the following shares of imports during 2022: \*\*\* percent of imports from China; \*\*\* percent of imports from Colombia; \*\*\* percent of imports from the Dominican Republic; \*\*\* percent of imports from Ecuador; \*\*\* percent of imports from India; \*\*\* percent of imports from Indonesia; \*\*\* percent of imports from Italy; \*\*\* percent of imports from Malaysia; \*\*\* percent of imports from Mexico; \*\*\* percent of imports from South Korea; \*\*\* percent of imports from Taiwan; \*\*\* percent of imports from Thailand; \*\*\* percent of imports from Turkey; \*\*\* percent of imports from the UAE; and \*\*\* percent of imports from Vietnam. CR/PR at VII-4. Shares are based on the shares of imports under the primary HTS numbers adjusted using data submitted in response to the Commission’s U.S. importer questionnaire to report China subject vs. nonsubject data and to add in reported in-scope imports under other HTS statistical reporting numbers. CR/PR at VII-4 n.6. The primary HTS statistical reporting numbers are: 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080. CR/PR at I-5.

<sup>8</sup> 19 U.S.C. § 1677(4)(A).

<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).



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 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> It may, where appropriate, include domestic articles in the domestic like product in addition to those described in the scope.<sup>17</sup>

In its notices of initiation, Commerce defined the imported merchandise within the scope of these investigations as follows:

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<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. Cir. 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).

<sup>14</sup> See, e.g., *Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Dep't of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int'l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Torrington 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> See, e.g., *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.").

<sup>17</sup> See, e.g., *Pure Magnesium from China and Israel*, Inv. Nos. 701-TA-403 and 731-TA-895-96 (Final), USITC Pub. 3467 (Nov. 2001) at 8 n.34; *Torrington*, 747 F. Supp. at 748-49 (holding that the Commission is not legally required to limit the domestic like product to the product advocated by the petitioner, co-extensive with the scope).

aluminum extrusions, regardless of form, finishing, or fabrication, whether assembled with other parts or unassembled, whether coated, painted, anodized, or thermally improved. Aluminum extrusions are shapes and forms, produced by an extrusion process, made from aluminum alloys having metallic elements corresponding to the alloy series designations published by the Aluminum Association commencing with the numbers 1, 3, and 6 (or proprietary equivalents or other certifying body equivalents). Specifically, subject aluminum extrusions made from an aluminum alloy with an Aluminum Association series designation commencing with the number 1 contain not less than 99 percent aluminum by weight. Subject aluminum extrusions made from an aluminum alloy with an Aluminum Association series designation commencing with the number 3 contain manganese as the major alloying element, with manganese accounting for not more than 3.0 percent of total materials by weight. Subject aluminum extrusions made from an aluminum alloy with an Aluminum Association series designation commencing with the number 6 contain magnesium and silicon as the major alloying elements, with magnesium accounting for at least 0.1 percent but not more than 2.0 percent of total materials by weight, and silicon accounting for at least 0.1 percent but not more than 3.0 percent of total materials by weight. The scope also includes merchandise made from an aluminum alloy with an Aluminum Association series designation commencing with the number 5 (or proprietary equivalents or other certifying body equivalents) that have a magnesium content accounting for up to but not more than 2.0 percent of total materials by weight.

The country of origin of the aluminum extrusion is determined by where the metal is extruded (*i.e.*, pressed through a die).

Aluminum extrusions are produced and imported in a wide variety of shapes and forms, including, but not limited to, hollow profiles, other solid profiles, pipes, tubes, bars, and rods. Aluminum extrusions that are drawn subsequent to extrusion (drawn aluminum) are also included in the scope.

Subject aluminum extrusions are produced and imported with a variety of coatings and surface treatments, and types of fabrication. The types of coatings and treatments applied to aluminum extrusions include, but are not limited to, extrusions that are mill finished (*i.e.*, without any coating or further finishing), brushed, buffed, polished, anodized (including brightdip), liquid painted, electroplated, chromate converted, powder coated, sublimated, wrapped, and/or bead blasted. Subject aluminum extrusions may also be fabricated, *i.e.*, prepared for assembly, or thermally improved.

Such operations would include, but are not limited to, extrusions that are cut-to-length, machined, drilled, punched, notched, bent, stretched, stretch-formed, hydroformed, knurled, swedged, mitered, chamfered, threaded, and spun. Performing such operations in third countries does not otherwise remove the merchandise from the scope of the investigations.

The types of products that meet the definition of subject merchandise include but are not limited to, vehicle roof rails and sun/ moon roof framing, solar panel racking rails and framing, tradeshow display fixtures and framing, parts for tents or clear span structures, fence posts, drapery rails or rods, electrical conduits, door thresholds, flooring trim, electric vehicle battery trays, heat sinks, signage or advertising poles, picture frames, telescoping poles, or cleaning system components.

Aluminum extrusions may be heat sinks, which are fabricated aluminum extrusions that dissipate heat away from a heat source and may serve other functions, such as structural functions. Heat sinks come in a variety of sizes and shapes, including but not limited to a flat electronic heat sink, which is a solid aluminum extrusion with at least one flat side used to mount electronic or mechanical devices; a heat sink that is a housing for electronic controls or motors; lighting heat sinks, which dissipate heat away from LED devices; and process and exchange heat sinks, which are tube extrusions with fins or plates used to hold radiator tubing. Heat sinks are included in the scope, regardless of whether the design and production of the heat sinks are organized around meeting specified thermal performance requirements and regardless of whether they have been tested to comply with such requirements. For purposes of these investigations on aluminum extrusions from the People's Republic of China, only heat sinks designed and produced around meeting specified thermal performance requirements and tested to comply with such requirements are included in the scope.

Merchandise that is comprised solely of aluminum extrusions or aluminum extrusions and fasteners, whether assembled at the time of importation or unassembled, is covered by the scope in its entirety.

The scope also covers aluminum extrusions that are imported with non-extruded aluminum components beyond fasteners, whether assembled at the time of importation or unassembled, that are a part or subassembly of a larger product or system. Only the aluminum extrusion portion of the merchandise described in this paragraph, whether assembled or unassembled, is subject to duties. Examples of

merchandise that is a part or subassembly of a larger product or system include, but are not limited to, window parts or subassemblies; door unit parts or subassemblies; shower and bath system parts or subassemblies; solar panel mounting systems; fenestration system parts or subassemblies, such as curtain wall and window wall units and parts or subassemblies of storefronts; furniture parts or subassemblies; appliance parts or subassemblies, such as fin evaporator coils and systems for refrigerators; railing or deck system parts or subassemblies; fence system parts or subassemblies; motor vehicle parts or subassemblies, such as bumpers for motor vehicles; trailer parts or subassemblies, such as side walls, flooring, and roofings; electric vehicle charging station parts or subassemblies; or signage or advertising system parts or subassemblies. Parts or subassemblies described by this paragraph that are subject to duties in their entirety pursuant to existing antidumping and countervailing duty orders are excluded from the scope of these investigations, so long as they remain subject to the scope of such orders. Any part or subassembly that otherwise meets the requirements of this scope and that is not covered by other antidumping and/or countervailing duty orders remains subject to the scope of these investigations.

The scope excludes assembled merchandise containing non-extruded aluminum components beyond fasteners that is not a part or subassembly of a larger product or system and that is used as imported, without undergoing after importation any processing, fabrication, finishing, or assembly or the addition of parts or material, regardless of whether the additional parts or material are interchangeable.

The scope also excludes merchandise containing non-extruded aluminum components beyond fasteners that is not a part or subassembly of a larger product or system that enters unassembled as a packaged combination of parts to be assembled as is for its intended use, without undergoing after importation any processing, fabrication, or finishing or the addition of parts or material, regardless of whether the additional parts or material are interchangeable. To be excluded under this paragraph, the merchandise must be sold and enter as a discrete kit on one Customs entry form.

Examples of such excluded assembled and unassembled merchandise include windows with glass, door units with door panel and glass, motor vehicles, trailers, furniture, and appliances.

The scope also includes aluminum extrusions that have been further processed in a third country, including, but not limited to, the finishing and fabrication processes described

above, assembly, whether with other aluminum extrusion components or with non-aluminum extrusion components, or any other processing that would not otherwise remove the merchandise from the scope if performed in the country of manufacture of the in-scope product. Third country processing; finishing; and/or fabrication, including those processes described in the scope, does not alter the country of origin of the subject aluminum extrusions.

The following aluminum extrusion products are excluded: aluminum extrusions made from an aluminum alloy with an Aluminum Association series designations commencing with the number 2 (or proprietary equivalents or other certifying body equivalents) and containing in excess of 1.5 percent copper by weight; aluminum extrusions made from an aluminum alloy with an Aluminum Association series designation commencing with the number 5 (or proprietary equivalents or other certifying body equivalents) and containing in excess of 2.0 percent magnesium by weight; and aluminum extrusions made from an aluminum alloy with an Aluminum Association series designation commencing with the number 7 (or proprietary equivalents or other certifying body equivalents) and containing in excess of 2.0 percent zinc by weight.

The scope also excludes aluminum alloy sheet or plates produced by means other than the extrusion process, such as aluminum products produced by a method of continuous casting or rolling. Cast aluminum products are also excluded. The scope also excludes unwrought aluminum in any form.

The scope also excludes collapsible tubular containers composed of metallic elements corresponding to alloy code 1080A as designated by the Aluminum Association (not including proprietary equivalents or other certifying body equivalents) where the tubular container (excluding the nozzle) meets each of the following dimensional characteristics: (1) length of 37 millimeters (mm) or 62 mm; (2) outer diameter of 11.0 mm or 12.7 mm; and (3) wall thickness not exceeding 0.13 mm.

Also excluded from the scope of these investigations is certain rectangular wire, imported in bulk rolls or precut strips and produced from continuously cast rolled aluminum wire rod, which is subsequently extruded to dimension to form rectangular wire with or without rounded edges. The product is made from aluminum alloy grade 1070 or 1370 (not including proprietary equivalents or other certifying body equivalents), with no recycled metal content allowed. The dimensions of the wire are 2.95 mm to 6.05 mm in width, and 0.65 mm to 1.25 mm in thickness. Imports of

rectangular wire are provided for under Harmonized Tariff Schedule of the United States (HTSUS) subheadings 7605.19.0000, 7604.10.5000, or 7616.99.5190.

Also excluded from the scope of these antidumping and countervailing duty investigations on aluminum extrusions from the People's Republic of China are all products covered by the scope of the antidumping and countervailing duty orders on Aluminum Extrusions from the People's Republic of China. See *Aluminum Extrusions from the People's Republic of China: Antidumping Duty Order*, 76 FR 30,650 (May 26, 2011); and *Aluminum Extrusions from the People's Republic of China: Countervailing Duty Order*, 76 FR 30,653 (May 26, 2011) (collectively, Aluminum Extrusions from the People's Republic of China). Solely for these investigations on aluminum extrusions from the People's Republic of China, the following is an exhaustive list of products that meet the definition of subject merchandise. Merchandise that is not included in the following list that meets the definition of subject merchandise in the 2011 antidumping and countervailing duty orders on Aluminum Extrusions from the People's Republic of China remains subject to the earlier orders. No other section of this scope language that provides examples of subject merchandise is exhaustive. The following products are included in the scope of these investigations on aluminum extrusions from the People's Republic of China, whether assembled or unassembled: heat sinks as described above; cleaning system components like mops and poles; banner stands/back walls; fabric wall systems; drapery rails; side mount valve controls; water heater anodes; solar panel mounting systems; 5050 alloy rails for showers and carpets; auto heating and cooling system components; assembled motor cases with stators; louver assemblies; event decor; window wall units and parts; trade booths; micro channel heat exchangers; telescoping poles, pole handles, and pole attachments; flagpoles; wind sign frames; foreline hose assembly; electronics enclosures; parts and subassemblies for storefronts, including portal sets; light poles; air duct registers; outdoor sporting goods parts and subassemblies; glass refrigerator shelves; aluminum ramps; handicap ramp system parts and subassemblies; frames and parts for tents and clear span structures; parts and subassemblies for screen enclosures, patios, and sunrooms; parts and subassemblies for walkways and walkway covers; aluminum extrusions for LED lights; parts and subassemblies for screen, storm, and patio doors; pontoon boat parts and subassemblies, including rub rails, flooring, decking, transom structures, canopy systems, eating; boat hulls, framing, ladders, and transom structures; parts and subassemblies for docks, piers, boat lifts and mounting; recreational and boat trailer parts and subassemblies, including subframes, crossmembers, and gates; solar tracker

assemblies with gears; garage door framing systems; door threshold and sill assemblies; highway and bridge signs; bridge, street, and highway rails; scaffolding, including planks and struts; railing and support systems; parts and subassemblies for exercise equipment; weatherstripping; door bottom and sweeps; door seals; floor transitions and trims; parts and subassemblies for modular walls and office furniture; truck trailer parts and subassemblies; boat cover poles, outrigger poles, and rod holders; bleachers and benches; parts and subassemblies for elevators, lifts, and dumbwaiters; parts and subassemblies for mirror and framing systems; window treatments; parts and subassemblies for air foils and fans; bus and RV window frames; sliding door rails; dock ladders; parts and subassemblies for RV frames and trailers; awning, canopy, and sunshade structures and their parts and subassemblies; marine motor mounts; linear lighting housings; and cluster mailbox systems.<sup>18</sup>

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<sup>18</sup> *Aluminum Extrusions From the People's Republic of China, Colombia, the Dominican Republic, Ecuador, India, Indonesia, Italy, the Republic of Korea, Malaysia, Mexico, Taiwan, Thailand, the Republic of Turkey, the United Arab Emirates, and the Socialist Republic of Vietnam: Initiation of Less-Than-Fair-Value Investigations*, 88 Fed. Reg. 74433,74421, 74429-30 (Oct. 31, 2023); *Aluminum Extrusions From the People's Republic of China, Indonesia, Mexico, and the Republic of Turkey: Initiation of Countervailing Duty Investigations*, 88 Fed. Reg. 74433,74438-40 (Oct. 31, 2023). Commerce indicated that imports of the subject merchandise are primarily provided for under the following categories of the HTSUS: 7604.10.1000; 7604.10.3000; 7604.10.5000; 7604.21.0010; 7604.21.0090; 7604.29.1010; 604.29.1090; 7604.29.3060; 7604.29.3090; 7604.29.5050; 7604.29.5090; 7608.10.0030; 7608.10.0090; 7608.20.0030; 7608.20.0090; 7609.00.0000; 7610.10.0010; 7610.10.0020; 7610.10.0030; 7610.90.0040; and 7610.90.0080. Commerce further explained that imports of the subject merchandise, including subject merchandise entered as parts of other products, may also be classifiable under the following additional HTSUS categories, as well as other HTSUS categories: 6603.90.8100; 7606.12.3091; 7606.12.3096; 7615.10.2015; 7615.10.2025; 7615.10.3015; 7615.10.3025; 7615.10.5020; 7615.10.5040; 7615.10.7125; 7615.10.7130; 7615.10.7155; 7615.10.7180; 7615.10.9100; 7615.20.0000; 7616.10.9090; 7616.99.1000; 7616.99.5130; 7616.99.5140; 7616.99.5190; 8302.10.3000; 8302.10.6030; 8302.10.6060; 8302.10.6090; 8302.20.0000; 8302.30.3010; 8302.30.3060; 8302.41.3000; 8302.41.6015; 8302.41.6045; 8302.41.6050; 8302.41.6080; 8302.42.3010; 8302.42.3015; 8302.42.3065; 8302.49.6035; 8302.49.6045; 8302.49.6055; 8302.49.6085; 8302.50.0000; 8302.60.3000; 8302.60.9000; 8305.10.0050; 8306.30.0000; 8414.59.6590; 8415.90.8045; 8418.99.8005; 8418.99.8050; 8418.99.8060; 8419.50.5000; 8419.90.1000; 8422.90.0640; 8424.90.9080; 8473.30.2000; 8473.30.5100; 8479.89.9599; 8479.90.8500; 8479.90.9596; 8481.90.9060; 8481.90.9085; 8486.90.0000; 8487.90.0080; 8503.00.9520; 8508.70.0000; 8513.90.2000; 8515.90.2000; 8516.90.5000; 8516.90.8050; 8517.71.0000; 8517.79.0000; 8529.90.7300; 8529.90.9760; 8536.90.8585; 8538.10.0000; 8541.90.0000; 8543.90.8885; 8547.90.0020; 8547.90.0030; 8708.10.3050; 8708.29.5160; 8708.80.6590; 8708.99.6890; 8807.30.0060; 9031.90.9195; 9401.99.9081; 9403.99.1040; 9403.99.9010; 9403.99.9015; 9403.99.9020; 9403.99.9040; 9403.99.9045; 9405.99.4020; 9506.11.4080; 9506.51.4000; 9506.51.6000; 9506.59.4040; 9506.70.2090; 9506.91.0010; 9506.91.0020; 9506.91.0030; 9506.99.0510; 9506.99.0520; 9506.99.0530; 9506.99.1500; 9506.99.2000; 9506.99.2580; 9506.99.2800; 9506.99.5500; 9506.99.6080; 9507.30.2000; 9507.30.4000; 9507.30.6000; 9507.30.8000; 9507.90.6000; 9547.90.0040; and 9603.90.8050. 88 Fed. Reg. at 74439-40.

Aluminum extrusions are shapes and forms produced by extruding aluminum alloys designated as beginning with the numbers 1, 3, and 6, or with the number 5 and having a magnesium content up to but not more than 2 percent of total by weight, as published by the Aluminum Association.<sup>19</sup> Shapes and forms of aluminum extrusions include, but are not limited to, hollow profiles, pipes, tubes, bars, and rods. They are produced with various finishes, coatings, and surface treatments.<sup>20</sup>

The scope definition covers all in-scope aluminum extrusions, regardless of whether the extrusion has been fabricated. The scope definition indicates that fabrication includes, but is not limited to, cutting to length, machining, drilling, punching, notching, bending, stretching, knurling, swedging, mitering, chamfering, threading, and spinning, except as otherwise specified in Commerce's scope definition.

Aluminum extrusions are often imported with other components attached in addition to fasteners; these aluminum extrusions are in-scope merchandise, whether assembled or not assembled, if they are a part of a subassembly of a larger product or system.<sup>21</sup> The scope definition excludes merchandise subject to the antidumping and countervailing duty orders on aluminum extrusions from China issued in May 2011, but the scope states that certain merchandise not subject to the existing orders, such as finished heat sinks, are included in the scope definition in these investigations.<sup>22</sup>

## **A. Arguments of the Parties**

### **1. Petitioners' Arguments**

Petitioners argue that the Commission should define a single domestic like product consisting of aluminum extrusions coextensive with the scope of the investigations. They contend that the scope of these investigations is largely the same as the Commission's 2011

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<sup>19</sup> CR/PR at I-16. Aluminum alloys include other elements such as iron, silicon, copper, magnesium, manganese, and zinc in order to enhance alloys' properties. *Id.* at I-16 n.29.

<sup>20</sup> CR/PR at I-21.

<sup>21</sup> Petitioners' Response to First Supplemental Scope Questions Regarding Common Issues and Injury Petition Volume I of the Petition (Oct. 13, 2023) at 1-2.

<sup>22</sup> Petitioners' Response to First Supplemental Scope Questions Regarding Common Issues and Injury Petition Volume I of the Petition (Oct. 13, 2023) at 1-2. Petitioners indicated that many products found by Commerce not to be covered by the existing antidumping and countervailing duty orders on aluminum extrusions from China are covered by the scope definition in these investigations.



investigations,<sup>23</sup> and as in the earlier investigations, aluminum extrusions exist on a continuum consisting of a near infinite number of shapes designed for a large number of applications, with no clear dividing lines. They maintain that just as in the *China Investigations*, only the aluminum extrusion portion of entering merchandise is in-scope.<sup>24</sup> Petitioners argue that this scope definition, like that in the prior investigations, covers all aluminum extrusions, regardless of the shape and form and regardless of whether the extrusion has been fabricated, *i.e.*, prepared for assembly. Further, as in the *China Investigations*, they assert the scope covers aluminum extrusions that are imported with non-extruded aluminum components, assembled or unassembled, that are a part or subassembly of a larger product or system.<sup>25</sup>

Petitioners argue the Commission should not define a separate domestic like product corresponding to either fabricated aluminum extrusions or subassemblies. They urge the Commission to reject arguments for defining the domestic like product to include out-of-scope merchandise. Petitioners cite *Small Vertical Shaft Engines from China*, in which the scope covered small vertical shaft engines, whether or not mounted on non-hand-held outdoor power equipment, as an instance when the Commission rejected arguments to define the domestic like product to include out-of-scope power equipment.<sup>26</sup>

Petitioners contend that there is no clear dividing line between pipes and tubes and other aluminum extrusions. They contend that acceptance of Hydro Precision's domestic like product argument would lead the Commission to define countless other separate domestic like products because of the large number of types of aluminum extrusions.<sup>27</sup>

Petitioners acknowledge that all types of aluminum extrusions, including finished heat sinks, have different physical characteristic and uses and therefore lack interchangeability, but argue that aluminum extrusions exist on a continuum.<sup>28</sup> They further argue that finished heat

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<sup>23</sup> *Certain Aluminum Extrusions from China*, Inv. Nos. 701-TA-475 and 731-TA-1177 (Final), USITC Pub. 4229 (May 2011) ("*China Investigations*" or "USITC Pub. 4229").

<sup>24</sup> Petitioners' Postconference Brief, Exhibit 1 at 16.

<sup>25</sup> Petitioners' Postconference Brief, Exhibit 1 at 16.

<sup>26</sup> Petitioners' Postconference Brief, Exhibit 1 at 22 (citing *Small Vertical Engines from China*, Inv. Nos. 701-TA-643 and 731-TA-1493 (Final), USITC Pub. 5185 (Apr. 2021) at 6). Petitioners also point out that in the *Freight Rail Coupler* investigations, the scope covered only the couplers regardless of whether they were attached to other out-of-scope components or rail cars. Petitioners' Postconference Brief, Exhibit 1 at 23 (citing *Freight Rail Coupler Systems and Components from China*, Inv. Nos. 701-TA-670 and 731-TA-1570 (Final), USITC Pub. 5331 (July 2022) at 6).

<sup>27</sup> Petitioners' Postconference Brief, Exhibit 1 at 36-40.

<sup>28</sup> Petitioners' Postconference Brief, Exhibit 1 at 18-19. However, they argue "the lack of interchangeability between {certain aluminum extrusions} and other aluminum extrusions does not by itself provide any guidance on whether there is a clear dividing line between them." *Id.* at 45, citing USITC Pub. 4229 at 9.

sinks, like all aluminum extrusions, are produced by the same producers and employees in the same facilities using the same processes and are priced using the same formula.<sup>29</sup>

## 2. Respondents' Arguments

Respondents advance arguments relating to several different categories or types of merchandise.

*Subassemblies.* The Downstream Industry Coalition argues that the Commission should consider all the parts of subassemblies to be in-scope merchandise, including the parts that are not extruded aluminum. It emphasizes that the language of the scope definitions in the *China Investigations* explicitly stated that the “scope does not include the non-aluminum extrusion components of subassemblies or subject kits,” and claims that the absence of such language in these investigations must mean that the scope definition here includes such non-aluminum extrusion components of subassemblies.<sup>30</sup>

Reflection, like the Downstream Industry Coalition, asserts that the entire subassembly is in-scope merchandise, including parts that are not aluminum extrusions. It argues that regardless of how duties are assessed, the scope states clearly that the merchandise it is describing (and thus covering) is the entire downstream product (or kit). Thus, it submits that the scope language covers a broad category of downstream products “that are part or subassembly of a larger product or system.” Finally, Reflection urges the Commission to go even further based upon testimony in the *China Investigations* and find that all subassemblies and simpler aluminum extrusions, such as those products subject to the existing orders on aluminum extrusions from China, are separate domestic like products.<sup>31</sup>

The Downstream Industry Coalition argues that, even if the Commission concludes that only the extruded aluminum portion of the assembly is in-scope merchandise, the Commission should define its domestic like product with respect to the entire assembly.<sup>32</sup> It contends that the Commission has looked at complete downstream products (*i.e.*, assemblies) in prior investigations despite parts of the assemblies being out-of-scope merchandise.<sup>33</sup> MAHLE notes

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<sup>29</sup> Petitioners' Postconference Brief, Exhibit 1 at 40-48.

<sup>30</sup> Downstream Industry Coalition's Postconference Brief at 7 (citing S. Rep. No. 96-249, at 90 (1979)); Downstream Industry Coalition's Postconference Brief, Answers to Questions at 33-35.

<sup>31</sup> Reflection's Postconference Brief at 14-15.

<sup>32</sup> Downstream Industry Coalition's Postconference Brief at 5-6.

<sup>33</sup> Downstream Industry Coalition's Postconference Brief at 8-9 (citing *Walk-Behind Lawn Mowers from China and Vietnam*, Inv. Nos. 701-TA-648 and 731-TA-1521-1522 (Final), USITC Pub. 5209 (July 2021) and *Certain Aluminum Extrusions from China*, USITC Pub. 4229)).

that in *Folding Gift Boxes from China*,<sup>34</sup> *Automotive Replacement Glass Windshields from China*,<sup>35</sup> and *Durum and Hard Spring Wheat from Canada*,<sup>36</sup> the Commission defined separate domestic like products, although it does not contend that the Commission defined separate domestic like products consisting entirely of out-of-scope merchandise or entirely of products that included out-of-scope merchandise.<sup>37</sup>

*Assemblies and Complex Aluminum Parts.* The Downstream Industry Coalition also argues that “assemblies and complex aluminum parts,”<sup>38</sup> should be defined as a separate domestic like product distinct from the upstream aluminum extrusions under either the traditional six-factor test, or under the five-factor semifinished products test. Such products, it argues, undergo far more fabrication than other aluminum extrusions and should be defined as a separate domestic like product under both the Commission’s traditional and semifinished product tests.<sup>39</sup>

*Window Wall Systems.* Reflection argues that its window wall units or systems should be defined as a separate domestic like product. According to Reflection, window wall systems are entirely in-scope merchandise and can therefore be defined as a separate domestic like product, apart from other in-scope aluminum extrusions.<sup>40</sup>

*Water Heater Anodes.* A.O. Smith, a manufacturer of water heaters, argues that the Commission should define water heater anodes as a separate domestic like product because water heater anodes contain aluminum and steel that have been extruded together. A.O. Smith claims that water heater anodes are only used for preventing corrosion in water heaters and are only marketed and sold to water heater manufacturers.<sup>41</sup>

*Aluminum Pipes and Tubes.* Hydro Precision argues that pipe and tube aluminum extrusions should be defined as a separate domestic like product because the Aluminum Association separates extrusions into three broad categories: 1) pipes and tubes; 2) extruded

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<sup>34</sup> Inv. No. 731-TA-921 (Final), USITC Pub. 3480, at 13 (Dec. 2001).

<sup>35</sup> Inv. No. 731-TA-922 (Final) USITC Pub. 3494, at 7 (Mar. 2002)

<sup>36</sup> Inv. Nos. 701-TA-430A and 430B, and 731-TA-1019A and 1019B (Final), USITC Pub. 3639, at 7 (Oct. 2003).

<sup>37</sup> MAHLE’s Postconference Brief at 16-17.

<sup>38</sup> The Downstream Industry Coalition defines the term “complex aluminum parts” as “those parts that are manufactured from aluminum extrusions through {computer numerical control} machining and/or hydroforming, such that the final part is a complex shape that no longer has a uniform cross section and therefore does not resemble the upstream aluminum profile.” Downstream Industry Coalition’s Postconference Brief at 1-2.

<sup>39</sup> Downstream Industry Coalition’s Postconference Brief at 11-19, 21-22.

<sup>40</sup> Reflection’s Postconference Brief at 10-12.

<sup>41</sup> A.O. Smith’s Postconference Brief at 3-7.

shapes; and 3) rod and bar. It contends that all six domestic like product factors support defining aluminum pipes and tubes as a separate domestic like product.<sup>42</sup>

## **B. Analysis**

We discuss below the record with respect to the several domestic like product issues raised in these investigations. Based on the record of the preliminary phase of the investigations, we define a single domestic like product consisting of aluminum extrusions, coextensive with the scope.

### **1. Whether Subassemblies, Window Wall Systems, or Assemblies and Complex Aluminum Parts Should be Defined as Separate Domestic Like Products**

The starting point of the Commission's domestic like product analysis is Commerce's scope definition. In these investigations, the parties disagree as to what merchandise is within the scope definition. Petitioners state that the scope definition is largely the same as, although not identical to, that in the *China Investigations*.<sup>43</sup> Respondents, on the other hand, argue that the Commission should find that the scope language in these investigations covers all parts of subassemblies and not only the aluminum extrusion portion. Based on their contention that entire subassemblies containing aluminum extrusions constitute in-scope merchandise, and not just the aluminum extrusion part, they argue that the Commission should define subassemblies generally, and two types of subassemblies (window wall systems and assemblies and complex aluminum parts) specifically, as separate domestic like products. Neither the scope language in Commerce's notice of initiation nor the petitions support respondents' arguments that the scope includes entire subassemblies. First, the scope definition in Commerce's notice of initiation states that:

The scope also covers aluminum extrusions that are imported with non-extruded aluminum components beyond fasteners, whether assembled at the time of importation or unassembled, that are a part or subassembly of a larger product or system. Only the aluminum extrusion portion of the merchandise described in this paragraph, whether assembled or unassembled, is subject to duties.<sup>44</sup>

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<sup>42</sup> Hydro Precision's Postconference Brief at 11-13, 15-17.

<sup>43</sup> Conf. Tr. at 61 (DeFrancesco).

<sup>44</sup> CR/PR at I-10.

Respondents contend that notwithstanding that only the aluminum extrusion portion of subassemblies is subject to duties, the other portions should also be considered in-scope merchandise. We disagree. The scope specifies that it covers *aluminum extrusions* that are imported with non-extruded aluminum components that are a part or subassembly of a larger product or system. The statement that follows that only the aluminum extrusion portion of such merchandise is subject to duties does not act to bring in-scope other components of the part or subassembly; the statement only clarifies the portion of such merchandise that would be subject to duties. Further, Commerce rejected respondents' argument at initiation and stated that:

the Petitions have been clear from the start that, with respect to aluminum extrusions that are imported with non-extruded aluminum components beyond fasteners, whether assembled at the time of importation or unassembled, only the aluminum extrusion component(s) of such products are covered by the scope. The petitioners have been explicitly clear from the outset that they intend to cover only the aluminum extrusion components.<sup>45</sup>

Accordingly, respondents' arguments that the scope definition encompasses portions of subassemblies other than the aluminum extrusion portion are misplaced. The imported subject merchandise within the scope of these investigations includes the aluminum extrusion components of subassemblies, but it does not include the entire subassembly.<sup>46</sup>

Respondents argue that even if the subassembly or other downstream products (*e.g.*, window wall systems, and assemblies and complex aluminum parts) are not subject merchandise under Commerce's scope definition, the Commission should nonetheless consider

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<sup>45</sup> See Department of Commerce Aluminum Extrusions from the People's Republic of China, Antidumping Duty Initiation Checklist (Oct. 24, 2023) at 15.

<sup>46</sup> As the Commission observed in its five-year review of the orders on aluminum extrusions from China, this is not the only instance in which Commerce defined the scope of an investigation that provided for the assessment of duties on only the covered portions of a subassembly. *Aluminum Extrusions from China*, Inv. Nos. 701-TA-475 and 731-TA-1177 (Review), USITC Pub.4677 (March 2017) at 18 n.62 (citing *Certain Steel Wheels from China*, Inv. Nos. 701-TA-478 and 731-TA-1182 (Final), USITC Pub. 4319 (May 2012) at 5 (scope included "steel wheels, whether or not attached to tires or axles" If imported as an assembly, "the tire or axle is not covered by the scope"); *Certain New Pneumatic Off-the-Road Tires from China, India, and Sri Lanka*, Inv. Nos. 701-TA-551-553 and 731-TA-1307-1308 (Preliminary), USITC Pub. 4594 (Mar. 2016) at 7 (scope included "certain off road tires, whether or not mounted on wheels or rims" although "if a subject tire is imported mounted on a wheel or rim, only the tire is covered by the scope." If the tires are attached to a vehicle, they are "not covered by the scope"); *DRAMs and DRAM Modules from Korea*, Inv. 701-TA-431 (Final), USITC Pub. 3616 (Aug. 2003) (scope included removable memory modules on motherboards)).

the entire downstream product for its analysis of the appropriate domestic like product definition. We disagree. First, contrary to respondents' arguments, there is no statutory prohibition on the Commission examining whether an input to a downstream product is a like product.<sup>47</sup> Second, the prior Commission investigations respondents cite are not instances of the Commission treating out-of-scope merchandise made from in-scope and out-of-scope parts as in-scope merchandise when conducting its domestic like product analysis. For instance, in the investigation cited by the Downstream Industry Coalition, *Walk-Behind Lawn Mowers from China and Vietnam*,<sup>48</sup> the Commission considered whether it should define a single domestic like product more broadly than the scope to include all walk-behind mowers that meet the physical description in the scope, even if they contained engines similar to those subject to an existing antidumping duty order and therefore out-of-scope. Because the entire lawn mowers were in-scope merchandise, the Commission compared in-scope and out-of-scope mowers, but did not consider defining out-of-scope mowers as a separate domestic like product.<sup>49</sup> In the other example cited by the Downstream Industry Coalition, the *China Investigations*, the Commission considered whether the aluminum extrusions used in knock-down units ("KDs"), which are assemblies containing highly fabricated aluminum extrusions and a variety of out-of-scope parts, should be defined as a separate domestic like product. Although the Commission discussed the use of aluminum extrusions in KDs, it compared in-scope aluminum extrusions used in KDs with other in-scope aluminum extrusions to determine whether a clear dividing line separated the products.<sup>50</sup>

Nor has the Commission defined a separate like product corresponding to out-of-scope merchandise, as respondents advocate here in urging the Commission to define separate domestic like products corresponding to out-of-scope assemblies and downstream products. The Commission may expand its definition of the domestic like product to include out-of-scope merchandise when no clear dividing line separates such merchandise from in-scope merchandise under the six like product factors. But the Commission generally does not define out-of-scope merchandise as its own separate domestic like product because doing so would

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<sup>47</sup> See Downstream Coalition's Postconference Brief at 7-8 (arguing that "when making its like product determination, the statute and the legislative history requires the Commission to examine whether a particular product in its *entirety* is like the subject. The statute does not permit the Commission to analyze an input to a product to be the like product itself.")

<sup>48</sup> Inv. Nos. 701-TA-648 and 731-TA-1521-1522 (Final), USITC Pub. 5209 (July 2021) at 12-13.

<sup>49</sup> USITC Pub. 5209 at 12 ("We find that there is not a clear dividing line between U.S. produced walk-behind mowers with and without engines subject to the SVSE orders.")

<sup>50</sup> *China Investigations*, USITC Pub. 4229 at 8-10 ("{T}his factor does not distinguish KDs from other extrusions.")

require the Commission to find a clear dividing line separating the out-of-scope merchandise from in-scope merchandise, in which case the out-of-scope merchandise would not qualify as a domestic like product as there would be no imported product in the scope corresponding to that separate like product.<sup>51</sup>

In the Commission investigations cited by MAHLE, *Folding Gift Boxes from China*,<sup>52</sup> *Automotive Replacement Glass Windshields from China*,<sup>53</sup> and *Durum and Hard Spring Wheat from Canada*,<sup>54</sup> the Commission, consistent with its standard practice, considered whether it should define the domestic like product more broadly than Commerce's scope definition, not whether to define out-of-scope merchandise as a separate domestic like product.

Moreover, in the Commission's five-year reviews of the existing orders on aluminum extrusions from China, the Commission rejected an argument similar to the one respondents advance here for defining an assembly of parts as a separate domestic like product. The subassemblies at issue in those reviews, fin evaporator coil systems, were out-of-scope merchandise, as only the aluminum extrusions used in the fin evaporator coil systems were in-scope merchandise. In rejecting the argument that fin evaporator coil systems should be defined as a separate domestic like product, the Commission explained that it could define a single, expanded domestic like product that includes out-of-scope merchandise, such as fin evaporator coil systems, or multiple domestic like products corresponding to different in-scope merchandise but could not define a separate domestic like product corresponding to out-of-scope merchandise.<sup>55</sup>

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<sup>51</sup> To define out-of-scope merchandise as its own separate domestic like product would generally be internally inconsistent. First, for the Commission to include out-of-scope merchandise in its domestic like product definition, the Commission would need to find that there is no clear dividing line between in-scope and out-of-scope merchandise. Then, in order to find separate domestic like products, the Commission would need to find that there is a clear dividing line between the in-scope and out-of-scope merchandise. See *Light-Walled Rectangular Pipe and Tube from China, Korea, Mexico, and Turkey*, Inv. Nos. 701-TA-449 (Preliminary) and 731-TA-1118-1121 (Preliminary), USITC Pub. 3941 (August 2007) at 7, n.26 ("because round pipe and tube is not included within the scope of these investigations, the Commission cannot define rectangular and circular light-walled pipe and tube and round pipe and tube as two separate domestic like products.").

<sup>52</sup> Inv. No. 731-TA-921 (Final), USITC Pub. 3480 (Dec. 2001) at 13.

<sup>53</sup> Inv. No. 731-TA-922 (Final) USITC Pub. 3494 (Mar. 2002) at 7.

<sup>54</sup> Inv. Nos. 701-TA-430A and 430B, and 731-TA-1019A and 1019B (Final), USITC Pub. 3639 (Oct. 2003) at 7.

<sup>55</sup> *Aluminum Extrusions from China*, Inv. Nos. 701-TA-475 and 731-TA-1177 (Review), USITC Pub. 4677 (Mar. 2017) at 19 ("Fin evaporator coil systems are not within the scope of imported subject merchandise, rather the aluminum extrusions components of such systems are within the scope and dutiable. Thus, the Commission could not define fin evaporator coil systems as a separate domestic like (Continued...)

Similarly, in *Fabricated Structural Steel*, respondents argued that process plant modules (“PPMs”) that contained some in-scope fabricated structural steel, but mostly out-of-scope components, should be defined to be a separate domestic like product. As the Commission explained, however, respondents argued neither that the fabricated structural steel in PPMs was distinct from other fabricated structural steel nor that the domestic like product should be broadened to include out-of-scope PPMs. Accordingly, the Commission did not analyze PPMs as a separate domestic like product under either the traditional or semifinished product test.<sup>56</sup>

Thus, as was the case with fin evaporator coil systems in the five-year reviews of the China orders and PPMs in *Fabricated Structural Steel*, we do not define out-of-scope merchandise containing in-scope components as separate like products, as argued by respondents. We therefore reject the Downstream Industry Coalition's invitation to define a separate domestic like product consisting of out-of-scope subassemblies comprised of in-scope complex aluminum parts and out-of-scope subassembly parts.<sup>57</sup> We also reject respondents' invitations to define separate domestic like products corresponding to out-of-scope

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product.”). The Commission separately considered the respondent’s alternative argument that the aluminum extrusions used in the fin evaporator coil systems should be defined as a separate domestic like product from other aluminum extrusions. *Id.* at 22-30.

<sup>56</sup> *Fabricated Structural Steel from Canada, China, and Mexico*, Inv. Nos. 701-TA-616-617 and 731-TA-1432-1434 (Final), USITC Pub. 5031 (Mar. 2021) (“*Fabricated Structural Steel*”) at 23 (finding that there is “no basis for separate domestic like product treatment for PPMs”).

<sup>57</sup> The Commission typically does not expand the domestic like product beyond the scope of investigation to include downstream products such as subassemblies when there is no corresponding downstream imported article within the scope. *See, e.g., Aluminum Foil from China*, Inv. Nos. 701-TA-570 and 731-TA-1346 (Final), USITC Pub. 4771 (Apr. 2018) at 15; *Sodium Hexametaphosphate from China*, Inv. No. 731-TA-1110 (Preliminary), USITC Pub. 3912 (Apr. 2007) at 7, n. 36; *Certain Frozen or Canned Warmwater Shrimp from Brazil, China, Ecuador, India, Thailand, and Vietnam*, Inv. Nos. 731-TA-1063-1068 (Preliminary), USITC Pub. 3672 (Feb. 2004) at 14-15; Low Enriched Uranium, *supra*, USITC Pub. 3388 at 6; *Beryllium Metal and High-Beryllium Alloys from Kazakhstan*, Inv. No. 731-TA-746 (Final), USITC Pub. 3019 at 5 (Feb. 1997) at 5; *Fresh Garlic from the People’s Republic of China*, Inv. No. 731-TA-683 (Final), USITC Pub. 2825 (Nov. 1994) at I-14 & n. 65.

To do otherwise would include in the domestic industry firms whose interests, as customers for products within the scope, are contrary to those of domestic producers of those articles within the scope. *Certain Wax and Wax/Resin Thermal Transfer Ribbons From France and Japan*, Inv. Nos. 731-TA-1039-1040 (Final) (Remand), USITC Pub. 3854 (Apr. 2006) at 3-4. *See also Aluminum Foil from China*, Inv. Nos. 701-TA-570 and 731-TA-1346 (Final), USITC Pub. 4771 (Apr. 2018) at 15.



subassemblies<sup>58</sup> or window wall systems,<sup>59</sup> as only the aluminum extrusions contained therein are in-scope.

## 2. Whether In-Scope Aluminum Extrusions Should be Defined as a Single Domestic Like Product

We consider below the evidence in the record concerning in-scope aluminum extrusions under the Commission's traditional six-factor domestic like product test.<sup>60</sup>

*Physical Characteristics and Uses.* Aluminum extrusions come in many shapes and forms, but all are made with particular aluminum alloys.<sup>61</sup> They have a variety of surface treatments and fabrication, although sometimes they have no coating or further finishing at all.<sup>62</sup> They are dedicated to particular end uses that determines the nature of any surface treatment and fabrication for that extrusion, although the uses include a wide variety of finished goods applications.<sup>63</sup>

*Manufacturing Facilities, Production Processes, and Production Workers.* All aluminum extrusions are produced on an extrusion press by pushing a heated alloyed aluminum billet through a die.<sup>64</sup> Different dies are used to produce different shapes so the use of a different die is not a distinguishing factor among aluminum extrusions.<sup>65</sup> Any further fabrication

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<sup>58</sup> The scope definition "covers aluminum extrusions that are imported with non-extruded aluminum components beyond fasteners, whether assembled at the time of importation or unassembled, that are a part or subassembly of a larger product or system."

<sup>59</sup> The scope definition identifies window wall units or systems as an example of an assembly of parts that contains in-scope merchandise.

<sup>60</sup> The semifinished product test is typically applied when assessing whether in-scope upstream and downstream products should be defined to be a single domestic like product. For this reason, in the *China Investigations* and the first five-year reviews of the orders, the Commission found the semifinished product test unsuitable for analyzing the domestic like product issues presented. See *Aluminum Extrusions from China*, Inv. Nos. 701-TA-475 and 731-TA-1177 (Review), USITC Pub. 4677 (Mar. 2017) at 21 ("Because respondents have not sought to define domestic like products {on the basis of upstream and downstream articles in general} and because the scope of these reviews includes a variety of articles at different stages of processing, we utilize the traditional domestic like product factors."); *China Investigations*, USTIC Pub. 4229 at 7 n.16 ("We have determined that our traditional six-factor test is somewhat more appropriate than the semi-finished product analysis for analyzing the four like product issues raised. The semi-finished product analysis generally is applied to assess whether products at different stages of processing that are vertically related to each other should be included in the same like product.").

<sup>61</sup> CR/PR at I-18.

<sup>62</sup> CR/PR at I-16, I-21.

<sup>63</sup> CR/PR at I-17 and I-18; Petitioners' Postconference Brief, Exhibit 1 at 30-31.

<sup>64</sup> CR/PR at I-18, I-19.

<sup>65</sup> CR/PR at I-20.

processes, if they occur, are usually undertaken by the same U.S. producers that both extrude and fabricate the product, usually in the same facilities.<sup>66</sup>

*Interchangeability.* Aluminum extrusions of different shapes and sizes are dedicated to particular uses, which limits their interchangeability in different applications.<sup>67</sup>

*Customer and Producer Perceptions.* Customers and producers perceive all aluminum extrusions to fall within the same general product category of aluminum extrusions, although the preliminary record contains conflicting evidence as to whether market participants perceive certain types of extrusions as different from other in-scope extrusions.<sup>68</sup> Customers and producers recognize that particular types of aluminum extrusions are designed for specific end uses. This is not in itself a distinguishing factor among aluminum extrusions because all types of aluminum extrusions are designed for particular applications.<sup>69</sup>

*Channels of Distribution.* Aluminum extrusions are primarily sold to distributors and end users to varying degrees.<sup>70</sup> Particular aluminum extrusions may be sold to the end users of those types of aluminum extrusions, but this does not appear to be a distinguishing factor for any type of aluminum extrusion as aluminum extrusions have a variety of end uses and therefore are sold to variety of end users.

*Price.* Just as different types of aluminum extrusions exist on a continuum, there is a corresponding range of pricing with few, if any, clear dividing lines. Moreover, all aluminum extrusions are priced according to the same formula – base metal price tied to an index, delivery premium to obtain the metal, and a negotiated conversion margin.<sup>71</sup>

*Conclusion.* The record indicates that aluminum extrusions include a variety of aluminum alloy products of different shapes and forms that are subjected to varying amounts of finishing and fabrication processes but are generally manufactured in the same facilities using the same processes and employees at least at the extrusion stage, and often in additional stages of finishing and fabrication. All in-scope aluminum extrusions share similar channels of distribution, are perceived by producers and customers as a general category of products and are priced along a continuum according to the same pricing formula. While aluminum extrusions are designed in a wide range of shapes and sizes for specific end use applications,

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<sup>66</sup> CR/PR at I-21; Petitioners' Postconference Brief, Exhibit 1 at 6-7.

<sup>67</sup> Petitioners' Postconference Brief, Exhibit 1 at 31; *see also* CR/PR at I-16.

<sup>68</sup> For example, most U.S. producers reported finished heat sinks are fully or mostly perceived as the same as other in-scope extrusions, while most importers reported that they never are. CR/PR at Table I-2. Heat sinks are discussed further below.

<sup>69</sup> Petitioners' Postconference Brief, Exhibit 1 at 32.

<sup>70</sup> Petitioners' Postconference Brief, Exhibit 1 at 33.

<sup>71</sup> Petitioners' Postconference Brief, Exhibit 1 at 33.

and therefore lack interchangeability among different shapes and sizes, this is typical of products that exist on a continuum.<sup>72</sup> Where the domestically manufactured merchandise consists of a broad continuum of products, the Commission generally does not consider each type of merchandise to be a separate domestic like product that is only “like” its counterpart in the scope, but considers the continuum itself to constitute the domestic like product.<sup>73</sup> Based on the record in the preliminary phase of the investigations, we find that all aluminum extrusions within the scope belong in a single domestic like product.

We discuss below whether certain in-scope aluminum extrusions, including finished heat sinks, aluminum pipes and tubes, and water heater anodes, should be defined as separate domestic like products.

### **3. Whether Finished Heat Sinks Should be Defined as a Separate Domestic Like Product**

In the *China Investigations*, the Commission found that finished heat sinks (“FHS”) were a separate domestic like product.<sup>74</sup> The Commission defined FHS as fabricated heat sinks sold to electronics manufacturers that meet certain specified thermal performance requirements and which have been fully tested to comply with such requirements.<sup>75</sup> It found a clear dividing line separating FHS from other aluminum extrusions based on the customized thermal resistance properties of FHS and the unique aspects of the design, testing and production of FHS.<sup>76</sup>

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<sup>72</sup> See *Certain Steel Nails from China and the United Arab Emirates*, Inv. Nos. 731-TA-1114-1115 (Preliminary), USITC Pub. 3939 (Aug. 2007) at 8; *Carbon and Certain Alloy Steel Wire Rod from China, Germany, and Turkey*, Inv. Nos. 731-TA-1099-1101 (Preliminary), USITC Pub. 3832 (Jan. 2006) at 11.

<sup>73</sup> See *Carbon and Certain Alloy Steel Wire Rod from Brazil, Canada, Germany, Indonesia, Mexico, Moldova, Trinidad and Tobago, Turkey, and Ukraine*, Inv. Nos. 701-417-421 and 731-952, 954, 956-59, 961-62 (Final), USITC Pub. 3546 (Oct. 2002) at 8; *Certain Steel Wire Rod from Canada, Germany, Trinidad and Tobago, and Venezuela*, Inv. Nos. 701-TA-368-371 (Final), USITC Pub. 3075 (Nov. 1997) at 7.

<sup>74</sup> The U.S. Court of International Trade (“CIT”) affirmed the Commission’s decision to define FHS as a separate domestic like product and final negative determination regarding FHS. *Aluminum Extrusions Fair Trade Committee v. United States*, 36 C.I.T. 1370 (2012).

<sup>75</sup> *China Investigations*, USITC Pub. 4229 at 1 n.4.

<sup>76</sup> *China Investigations*, USITC Pub. 4229 at 9. The Commission also identified differences between FHS and other aluminum extrusions in the channels of trade through which they are sold; evidence that the thermal management industry is perceived by producers and customers as being different from the general aluminum extrusions industry; and the fact that FHS are sold at much higher prices than most other aluminum extrusions. *Id.*

In these investigations, no party argues that FHS, which are in-scope merchandise, should be defined as a separate domestic like product.<sup>77</sup> Nevertheless, in light of the Commission's decision to define FHS as a separate domestic like product in the *China Investigations*, the Commission collected information from U.S. producers and U.S. importers concerning the comparability of FHS and all other in-scope aluminum extrusions with respect to the six domestic like product factors.<sup>78</sup>

*Physical Characteristics and Uses.* Petitioners observe that the Commission found in the *China Investigations* that FHS are not different from other aluminum extrusions in terms of their metallurgic chemistry, or by virtue of being further fabricated or produced in custom shapes.<sup>79</sup> Moreover, as is the case with FHS, most aluminum extrusions are categorized according to their end use. Petitioners also argue that there is no category of "unfinished" heat sink which is not designed to dissipate heat and they maintain that all aluminum extrusions dissipate heat to a certain extent.<sup>80</sup>

In their questionnaire responses, a majority of U.S. producers reported that FHS and other aluminum extrusions are "fully" comparable with respect to physical characteristics and end uses while a majority of U.S. importers reported that they are "never" comparable.<sup>81</sup> The narrative answers provided by domestic producers identifying themselves as producers of FHS, \*\*\*, indicate the physical characteristics of FHS and other aluminum extrusions are similar.<sup>82</sup> Importer \*\*\*, however, reported physical differences between FHS and structural aluminum extrusions.<sup>83</sup>

*Manufacturing Facilities, Production Processes, and Production Workers.* While heat sinks may be produced to specific and precise tolerances, petitioners claim that this is true for any aluminum extrusion that requires precision manufacturing. As a petitioners' witness stated at the conference, "Heat sinks are an example of a custom product that undergoes fabrication and finishing, just like other extrusions that are fabricated and anodized."<sup>84</sup> One U.S. producer, Custom Aluminum, indicated that it uses the same processes to produce both FHS and other

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<sup>77</sup> The scope definition in these investigations only covers finished heat sinks from China, the product excluded from the existing China orders.

<sup>78</sup> See CR/PR at Table I-2 and Appendix D.

<sup>79</sup> Petitioners' Postconference Brief, Exhibit 1 at 42 (citing USITC Pub. 4229 at 7).

<sup>80</sup> Conf. Tr. at 40 (Dillett) ("Heat sinks are simply aluminum extrusions that dissipate heat due to their high thermal conductivity," but that "all extrusion dissipates heat.").

<sup>81</sup> See CR/PR at Table I-2.

<sup>82</sup> See, e.g., CR/PR at Table D-1 (\*\*\*) .

<sup>83</sup> CR/PR at Table D-2 (\*\*\*) .

<sup>84</sup> Conf. Tr. at 40 (Dillett).

aluminum extrusions.<sup>85</sup> It further stated that it produces heat sinks “using 6000 series alloy in the same facilities on the same equipment with the same employees as all {their} other extrusions.”<sup>86</sup> Petitioners argue that the “finished” distinction emphasized by the Commission in the *China Investigations* is not meaningful because all heat sinks (finished or not) are designed and produced to meet thermal performance requirements and then tested, usually by the customer.<sup>87</sup>

In their questionnaire responses, a majority of U.S. producers reported that FHS and other aluminum extrusions are “fully” comparable with respect to manufacturing facilities, production process and production employees, and a majority of U.S. importers reported that they are “fully” or “mostly” comparable.<sup>88</sup> Domestic producers identifying themselves as producers of FHS, \*\*\*, report \*\*\* manufacturing facilities, production processes and production employees for FHS and other aluminum extrusions.<sup>89</sup>

*Interchangeability.* FHS and other aluminum extrusions are generally not interchangeable because they are designed for distinct applications. A majority of responding U.S. producers reported that FHS and other aluminum extrusions are “fully” or “mostly” comparable with respect to interchangeability while a majority of responding U.S. importers reported that they are “never” comparable.<sup>90</sup>

*Customer and Producer Perceptions.* Petitioners state that customers and producers perceive all aluminum extrusions, including FHS, to fall within the same general product category of aluminum extrusions.<sup>91</sup> A majority of responding U.S. producers reported that FHS and other aluminum extrusions are “fully” or “mostly” comparable with respect to producer and customer perceptions while a slight majority of responding U.S. importers reported that they are “never” comparable.<sup>92</sup>

*Channels of Distribution.* Petitioners claim that FHS and other aluminum extrusions are sold to distributors and end users. They note that one U.S. producer, Custom Aluminum, reported selling FHS to many of the same customers as its other aluminum extrusions and often

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<sup>85</sup> Petitioners’ Postconference Brief, Exhibit 1 at 44; Conf. Tr. at 40 (Dillett).

<sup>86</sup> Conf. Tr. at 40 (Dillett).

<sup>87</sup> Petitioners’ Postconference Brief, Exhibit 1 at 46. *See also* Conf. Tr. at 98 (Dillett) (“In terms of testing, it’s uncommon for the extruder to do the testing for the customer, although we could if we were asked to do that.”).

<sup>88</sup> *See* CR/PR at Table I-2.

<sup>89</sup> *See, e.g.,* CR/PR at Table D-1 (\*\*\*)

<sup>90</sup> *See* CR/PR at Table I-2.

<sup>91</sup> Petitioners’ Postconference Brief, Exhibit 1 at 45.

<sup>92</sup> *See* CR/PR at Table I-2.

on the same orders.<sup>93</sup> A majority of responding U.S. producers reported that FHS and other aluminum extrusions are “fully” or “mostly” comparable with respect to channels of distribution.<sup>94</sup> Responding U.S. importers were evenly divided; half of U.S. importers reported that they are “fully” or “mostly” comparable and half indicated that they are “never” or “sometimes” comparable.<sup>95</sup> \*\*\*, an importer of FHS, indicated that FHS and other aluminum extrusions flow through similar, but not identical, channels of distribution.<sup>96</sup>

*Price.* FHS and other aluminum extrusions exist on a price continuum according to petitioners with FHS at the higher end – though they are not alone at the higher end. FHS and all aluminum extrusions are priced according to the same formula: base metal price tied to an index, delivery premium to obtain the metal, and a negotiated conversion margin.<sup>97</sup>

A majority of responding U.S. producers reported that FHS and other aluminum extrusions are “fully” comparable with respect to price.<sup>98</sup> Responding U.S. importers were evenly divided on price; half of U.S. importers reported that they are “fully” or “mostly” comparable and half indicated that they are “never” or “sometimes” comparable.<sup>99</sup> \*\*\* indicated that finished heat sinks are typically more expensive than construction extrusions but less so than automotive extrusions.<sup>100</sup>

*Conclusion.* The record in the preliminary phase of these investigations indicates that FHS and other aluminum extrusions are part of a single domestic like product comprising a continuum of products. As noted, responding domestic producers reported that FHS and other aluminum extrusions are generally comparable with respect to all six domestic like product factors, while importers’ responses were mixed. FHS’s more precise thermal requirements are the primary difference between FHS and other aluminum extrusions, but the record does not indicate that FHS have special production processes, with the possible exception of additional testing. Rather, FHS and other aluminum extrusions are produced in the same facilities by the same production process and by the same employees. The record also reflects comparability between FHS and other aluminum extrusions with respect to channels of distribution, customer and producer perceptions, and price. Although responding U.S. importers did not report a high degree of comparability with respect to physical characteristics and uses and

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<sup>93</sup> Petitioners’ Postconference Brief, Exhibit 1 at 47; Conf. Tr. at 40 (Dillett).

<sup>94</sup> See CR/PR at Table I-2.

<sup>95</sup> See CR/PR at Table I-2.

<sup>96</sup> CR/PR at Table D-2.

<sup>97</sup> Petitioners’ Postconference Brief, Exhibit 1 at 47; CR/PR at Table D-1.

<sup>98</sup> See CR/PR at Table I-2.

<sup>99</sup> See CR/PR at Table I-2.

<sup>100</sup> CR/PR at Table D-2.

interchangeability,<sup>101</sup> the record indicates that aluminum extrusions other than FHS also differ in their physical characteristics, have unique applications, and generally lack interchangeability with one another.

For these reasons, and in the absence of any contrary argument, we do not define FHS as a separate domestic like product.

#### **4. Whether Aluminum Pipes and Tubes Should be Defined as a Separate Domestic Like Product**

Hydro Precision argues that extruded aluminum pipes and tubes should be defined to constitute a separate domestic like product.<sup>102</sup> The information available on the record in the preliminary phase of these investigations is limited to the parties' arguments. We discuss below whether the current record supports defining extruded aluminum pipes and tubes to be a separate domestic like product.

*Physical Characteristics and Uses.* Petitioners argue that aluminum extrusions are produced in various shapes and forms, with the shape of the extrusion dictated by the particular end use. Hydro Precision, petitioners submit, essentially asks the Commission to define every different shape of aluminum extrusion as a separate domestic like product.<sup>103</sup>

Hydro Precision asserts that a major industry association, the Aluminum Association, separates aluminum extrusions into three broad categories: pipes and tubes, extruded shapes, and rod and bar. It emphasizes that the Aluminum Association's publication, *Aluminum Standards and Data 2017*, has a section setting forth definitions and standards for extruded aluminum pipes and tubes.<sup>104</sup>

*Manufacturing Facilities, Production Processes, and Production Workers.* Petitioners argue that all aluminum extrusions, including pipes and tubes, are produced on an extrusion press by pushing a heated alloyed aluminum billet through a die. According to petitioners, the use of different dies is not a distinguishing factor among aluminum extrusions; different dies are used to produce different shapes. They further claim that domestic producers manufacture aluminum pipes and tubes and other aluminum extrusions in the same facilities.<sup>105</sup>

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<sup>101</sup> See CR/PR at Table I-2.

<sup>102</sup> Hydro Precision's Postconference Brief at 3-18; Conf. Tr. at 212-214 (Pickard).

<sup>103</sup> Petitioners' Postconference Brief, Exhibit 1 at 37.

<sup>104</sup> Hydro Precision's Postconference Brief at 11-13.

<sup>105</sup> Petitioners' Postconference Brief, Exhibit 1 at 37-38; Conf. Tr. at 100-101 (Hamilton, Massey, Dillett, McEvoy, and Adams).

According to Hydro Precision, extruded aluminum pipes and tubes have distinct manufacturing facilities and employees that utilize dies unique to extruded aluminum pipe and tube production.<sup>106</sup>

*Interchangeability.* Petitioners claim that all types of aluminum extrusions are dedicated to a particular use and produced in a specific shape for that end use, and that aluminum extrusions exist on a continuum. They therefore maintain that this lack of interchangeability does not support defining separate like products for all the different shapes of aluminum extrusions.<sup>107</sup>

Hydro Precision asserts that aluminum pipes and tubes are not interchangeable with other types of aluminum extrusions due to their unique physical characteristics and end uses and the specific diameters required for the transmission of fluids, gases, or powder.<sup>108</sup>

*Customer and Producer Perceptions.* Petitioners argue that customers and producers perceive that all aluminum extrusions, including extruded aluminum pipes and tubes, are part of the same general category of aluminum extrusions.<sup>109</sup>

Hydro Precision argues that customer and producer perceptions for aluminum pipes and tubes are distinct, as shown by different advertising and the Aluminum Standards and Data Report's recognition of aluminum pipes and tubes as a distinct product category.<sup>110</sup>

*Channels of Distribution.* Petitioners assert that, regardless of shape, aluminum extrusions are primarily sold to distributors and end users.<sup>111</sup>

Hydro Precision claims that end use customers for aluminum pipes and tubes differ from those of other aluminum extrusions.<sup>112</sup>

*Price.* Petitioners maintain that domestic producers manufacture aluminum extrusions in a range of prices, and all aluminum extrusions, including pipes and tubes, are priced according to the same formula – base metal price tied to an index, delivery premium to obtain the metal, and a negotiated conversion margin.<sup>113</sup>

Hydro Precision maintains that aluminum pipe and tube are more expensive to produce than solid aluminum extrusions and typically have a higher per kilogram price.<sup>114</sup>

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<sup>106</sup> Hydro Precision's Postconference Brief at 13-15.

<sup>107</sup> Petitioners' Postconference Brief, Exhibit 1 at 38.

<sup>108</sup> Hydro Precision's Postconference Brief at 13-15.

<sup>109</sup> Petitioners' Postconference Brief, Exhibit 1 at 39.

<sup>110</sup> Hydro Precision's Postconference Brief at 13-15.

<sup>111</sup> Petitioners' Postconference Brief, Exhibit 1 at 39.

<sup>112</sup> Hydro Precision's Postconference Brief at 15-17.

<sup>113</sup> Petitioners' Postconference Brief, Exhibit 1 at 40.

<sup>114</sup> Hydro Precision's Postconference Brief at 17-18.



*Conclusion.* The limited information available on the record of the preliminary phase of these investigations suggests that aluminum pipes and tubes are primarily distinguished from other types of aluminum extrusions by their shape and end use. Given that other types of aluminum extrusions also possess different shapes and end uses, the different shape and use of extruded aluminum pipes and tubes is not a sufficient basis to define them as a separate domestic like product. Similarly, while the Aluminum Association publication cited by Hydro Precision shows that pipes and tubes are produced to their own standards, other types of aluminum extrusions are also produced to their own standards so this is not a distinguishing characteristic of pipe and tube. Although pipes and tubes lack interchangeability with other types of aluminum extrusions, this is generally true of all aluminum extrusions because they are typically made for specific uses. Therefore, we do not define extruded aluminum pipes and tubes as a separate domestic like product in the preliminary phase of these investigations.

## **5. Whether Water Heater Anodes Should be Defined as a Separate Domestic Like Product**

A.O. Smith argues that the Commission should define water heater anodes as a separate domestic like product. We discuss below whether the information available in the record, almost entirely consisting of A.O. Smith's arguments, supports defining water heater anodes as a separate domestic like product.

*Physical Characteristics and Uses.* A.O. Smith argues water heater anodes are a unique product because they are exclusively used to prevent corrosion of water heater interior storage tank surfaces. It explains that water heater anodes are intended to degrade over time as the aluminum is sacrificed to protect the interior surface. It also maintains that water heater anodes contain steel and are therefore not made entirely or primarily of aluminum like other aluminum extrusions.<sup>115</sup>

*Manufacturing Facilities, Production Processes, and Production Workers.* According to A.O. Smith, water heater anodes are produced by a different process than other aluminum extrusions. It claims that the aluminum for a water heater diode is extruded conterminously with a steel core and both materials form a single integrated rod. A.O. Smith argues the resulting assembly is also tested to confirm that its electrical conductivity is consistent throughout the length of the integrated rod and the cap. It maintains that the production of other aluminum extrusions, on the other hand, begins with alloy aluminum billets as the only raw material input, with no stainless steel or carbon steel rod co-extruded with the aluminum

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<sup>115</sup> A.O. Smith's Postconference Brief at 5-6.

billet. Finally, it argues that the producers of aluminum extrusions typically do not produce or sell water heater anodes.<sup>116</sup>

*Interchangeability.* A.O. Smith claims that water heater anodes and aluminum extrusions are not interchangeable as water heater anodes are used for the sole purpose of preventing corrosion in water heaters.<sup>117</sup>

*Customer and Producer Perceptions.* A.O. Smith maintains that producer and customer perceptions of water heater anodes and other aluminum extrusions differ because water heater anodes have specialized end-use applications.<sup>118</sup>

*Channels of Distribution.* A.O. Smith argues that, unlike other aluminum extrusions, water heater anodes are only marketed and sold to water heater manufacturers.<sup>119</sup>

*Price.* A.O. Smith contends that because of the broad scope of products covered by the investigations, prices for aluminum extrusions and water heater anodes often vary significantly.<sup>120</sup>

*Conclusion.* There is limited information on the record concerning water heater anodes, and it is unclear whether they are even produced domestically.<sup>121</sup> The information available indicates that if water heater anodes are produced domestically, they primarily differ from other types of domestically produced aluminum extrusions in terms of their distinctive physical characteristics and end use. As with aluminum extruded pipes and tubes, these distinctions, and the resulting lack of interchangeability with other types of aluminum extrusions, are typical

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<sup>116</sup> A.O. Smith's Postconference Brief at 5-6.

<sup>117</sup> A.O. Smith's Postconference Brief at 6.

<sup>118</sup> A.O. Smith's Postconference Brief at 6.

<sup>119</sup> A.O. Smith's Postconference Brief at 6.

<sup>120</sup> A.O. Smith's Postconference Brief at 7.

<sup>121</sup> See Petitioners' Postconference Brief, Exhibit 1 at 11 (stating that \*\*\*). The Commission generally does not define a separate domestic like product corresponding to a product not produced domestically. See *Large Residential Washers from China*, Inv. No. 731-TA-1306 (Preliminary), USITC Pub. 4591 (Feb. 2016) at 10 ("Absent evidence of domestic production of such washers, we have no basis for determining whether a clear dividing line separates domestically produced out-of-scope low-tech and front load extra-wide washers from in-scope LRWs in terms of our like product factors . . ."). In cases where there is no domestic production of a product in the scope and material retardation is not at issue, the Commission cannot define a separate domestic like product for merchandise not produced domestically and for which parties had not identified a domestic variant that was most similar in characteristics and uses. See *Cold-Drawn Mechanical Tubing from China and India*, Inv. Nos. 701-TA-576-577 (Final), USITC Pub. 4755 (Jan. 2018) at 14 (citing *Professional Electric Cutting and Sanding/Grinding Tools from Japan*, Inv. No. 731-TA-571 (Preliminary), USITC Pub. 2536 (July 1992) at 6). Material retardation is not at issue in these investigations because petitioners state that the domestic industry has produced water heater anodes in the past and that production \*\*\*. Petitioners' Postconference Brief, Exhibit 1 at 11-12. No party has identified a domestically produced variant that is most similar in characteristics and uses to water heater anodes.

of products that exist on a continuum.<sup>122</sup> Therefore, we do not define water heater anodes as separate domestic like product in the preliminary phase of these investigations.

For the foregoing reasons, based on the record of the preliminary phase of the investigations, we define a single domestic like product encompassing all aluminum extrusions within the scope of the investigations.<sup>123</sup>

#### **IV. 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>124</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.

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>122</sup> As previously discussed, where the domestically manufactured merchandise consists of a broad continuum of products, the Commission generally does not consider each item of merchandise to be a separate domestic like product that is only “like” its counterpart in the scope but considers the continuum itself to constitute the domestic like product. *See Carbon and Certain Alloy Steel Wire Rod from Brazil, Canada, Germany, Indonesia, Mexico, Moldova, Trinidad and Tobago, Turkey, and Ukraine*, Inv. Nos. 701-417-421 and 731-952, 954, 956-59, 961-62 (Final), USITC Pub. 3546 (Oct. 2002) at 8; *Certain Steel Wire Rod from Canada, Germany, Trinidad and Tobago, and Venezuela*, Inv. Nos. 701-TA-368-371 (Final), USITC Pub. 3075 (Nov. 1997) at 7.

<sup>123</sup> We remind parties to identify in their comments on the draft questionnaires for any final phase of these investigations any arguments that would implicate data collection, such as requests to define the domestic like product(s) in a different manner. *See, e.g.*, 19 C.F.R. § 207.20(b). Parties should clearly identify such products and explain the basis for the proposed separate domestic like product. As we have discussed above, certain domestic like product factors such as physical characteristics and uses and interchangeability implicate distinctions that are common to extruded aluminum products generally; in proposing that any product be treated as a separate domestic like products, it would be particularly helpful to explain any factors that raise distinctions from other in-scope products, such as whether certain extrusions are or can be produced only at certain types of facilities.

<sup>124</sup> 19 U.S.C. § 1677(4)(A).

or which are themselves importers.<sup>125</sup> Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.<sup>126</sup>

#### **A. Arguments of the Parties**

Petitioners state that they are not arguing for the exclusion of any related party.<sup>127</sup>

Domestic producer and importer Hydro Precision argues that it should not be excluded as a related party because it only \*\*\* and that its inclusion in the definition of the domestic industry will not skew industry data.<sup>128</sup> The Mexican Coalition states that it sees no reason to exclude any of the related parties in these investigations.<sup>129</sup>

#### **B. Analysis**

Four U.S. producers, \*\*\*, are subject to possible exclusion under the related parties provision because they imported subject merchandise during the January 2020-June 2023 period of investigation ("POI").<sup>130</sup> In addition, four additional U.S. producers, \*\*\*, are related parties by virtue of their relationships with importers or exporters of subject merchandise.

We next consider whether appropriate circumstances exist to exclude any related parties from the domestic industry.

\*\*\*. \*\*\* accounted for \*\*\* percent of U.S. production of aluminum extrusions in 2022 and was the \*\*\* of the reporting U.S. producers that year in terms of U.S. production

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<sup>125</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>126</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.*, 790 F. Supp. at 1168.

<sup>127</sup> Petitioners' Postconference Brief at 3.

<sup>128</sup> Hydro Precision's Postconference Brief at 19-21.

<sup>129</sup> Mexican Coalition's Postconference Brief at 9-10.

<sup>130</sup> CR/PR at Tables III-11 to III-14.

volume.<sup>131</sup> It \*\*\*.<sup>132</sup> \*\*\* imported subject merchandise from \*\*\* throughout the POI and from \*\*\* only in 2022.<sup>133</sup> The ratio of its subject imports to its domestic production was \*\*\* percent in 2020, \*\*\* percent in 2021, and \*\*\* percent in 2022; it was \*\*\* percent in interim 2022 and \*\*\* percent in interim 2023.<sup>134</sup> \*\*\* indicates that it “\*\*\*.”<sup>135</sup>

Given that \*\*\* ratio of subject imports to domestic production remained \*\*\* throughout the POI and it is the \*\*\* U.S. producer, its primary interest appears to be in domestic production. There is also no information on the record that \*\*\* inclusion in the domestic industry would skew industry data. In light of this, and the fact that no party supports its exclusion from the domestic industry, we find that appropriate circumstances do not exist to exclude \*\*\* from the domestic industry.

\*\*\*. \*\*\* accounted for \*\*\* percent of U.S. production of aluminum extrusions in 2022 and was the \*\*\* of the 29 reporting U.S. producers that year in terms of U.S. production volume.<sup>136</sup> It \*\*\*.<sup>137</sup> \*\*\* and its affiliate \*\*\* reported<sup>138</sup> importing subject merchandise from \*\*\*, although \*\*\*. \*\*\* and its affiliate’s total imports of subject merchandise during the POI were \*\*\* short tons in 2020, \*\*\* short tons in 2021, \*\*\* short tons in 2022, and \*\*\* short tons in interim 2023, compared with \*\*\* short tons in interim 2022.<sup>139</sup> \*\*\* U.S. production of aluminum extrusions increased from \*\*\* short tons in 2020, to \*\*\* short tons in 2021, and \*\*\* short tons in 2022; its U.S. production was \*\*\* short tons in interim 2023, compared with \*\*\* short tons in interim 2022.<sup>140</sup> The ratio of \*\*\* subject imports to \*\*\* domestic production was \*\*\* percent in 2020, \*\*\* percent in 2021, and \*\*\* percent in 2022.<sup>141</sup> It was \*\*\* percent in interim 2023, compared with \*\*\* percent in interim 2022.<sup>142</sup> \*\*\* explained that it imported certain products that it could not produce in the United States.<sup>143</sup> The firm reported increasing

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<sup>131</sup> CR/PR at Table III-1.

<sup>132</sup> U.S. Producer Questionnaire Response at I-4.

<sup>133</sup> CR/PR at Table III-11.

<sup>134</sup> CR/PR at Table III-11. \*\*\* imports from subject sources were \*\*\* short tons in 2020, \*\*\* short tons in 2021, \*\*\* short tons in 2022, \*\*\* short tons in interim 2022, and \*\*\* short tons in interim 2023. *Id.* As discussed below, \*\*\*, an affiliate of \*\*\*, also directly imported from subject sources. These firms are jointly owned by \*\*\*. CR/PR at Table III-2.

<sup>135</sup> CR/PR at Table III-16.

<sup>136</sup> CR/PR at Table III-1.

<sup>137</sup> \*\*\* U.S. Producer Questionnaire Response at I-4.

<sup>138</sup> Both firms are jointly owned by \*\*\*. CR/PR at Table III-2.

<sup>139</sup> CR/PR at Table III-12.

<sup>140</sup> CR/PR at Table III-12.

<sup>141</sup> CR/PR at Table III-12.

<sup>142</sup> CR/PR at Table III-12.

<sup>143</sup> \*\*\* Postconference Brief at 20. It reports importing products that require \*\*\*. *Id.*

capital expenditures of \$\*\*\* in 2020, \$\*\*\* in 2021, \$\*\*\* in 2022, and \$\*\*\* in interim 2023, compared with \$\*\*\* in interim 2022.<sup>144</sup>

Although the ratio of \*\*\* and its affiliate's subject imports to \*\*\* domestic production increased during the POI and remained \*\*\*, the record does not show that including \*\*\* in the definition of the domestic industry will skew the data for the domestic industry or mask injury to the industry.<sup>145</sup> In addition, \*\*\* domestic production increased over the POI, as it made \*\*\* capital investments in its domestic production operations, even as its imports of products not produced in the United States also increased.<sup>146</sup> In light of this, and the fact that no party supports its exclusion from the domestic industry, we find that appropriate circumstances do not exist to exclude \*\*\* from the domestic industry.

\*\*\*. \*\*\* accounted for \*\*\* percent of U.S. production of aluminum extrusions in 2022 and was the \*\*\* of the 29 reporting U.S. producers that year in terms of U.S. production volume.<sup>147</sup> \*\*\*.<sup>148</sup> \*\*\* imported subject merchandise from \*\*\* in 2022, interim 2022, and interim 2023.<sup>149</sup> The ratio of its subject imports to its domestic production was \*\*\* percent in 2022, \*\*\* percent in interim 2022, and \*\*\* percent in interim 2023.<sup>150</sup> \*\*\* indicates that it imported for \*\*\*.<sup>151</sup>

Given that \*\*\* only imported subject merchandise in 2022 and interim 2023, when its ratio of subject imports to domestic production was \*\*\*, its primary interest appears to be in domestic production. In light of this, and the fact that no party supports its exclusion from the domestic industry, we find that appropriate circumstances do not exist to exclude \*\*\* from the domestic industry.

\*\*\*. \*\*\* accounted for \*\*\* percent of U.S. production of aluminum extrusions in 2022 and was the \*\*\* of the 29 reporting U.S. producers that year in terms of U.S. production

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<sup>144</sup> CR/PR at Table VI-4.

<sup>145</sup> Indeed, \*\*\* reported operating losses throughout the POI while the industry as a whole reported operating income during the POI. Such results suggest it was not shielded from the effects of subject imports. See CR/PR at Table G-1. \*\*\* explained that its "\*\*\*\*". CR/PR at VI-17 n.42.

<sup>146</sup> CR/PR at Table III-12.

<sup>147</sup> CR/PR at Table III-1.

<sup>148</sup> CR/PR at Table III-1.

<sup>149</sup> CR/PR at Table III-13.

<sup>150</sup> CR/PR at Table III-13. \*\*\* subject imports from \*\*\* were \*\*\* short tons in 2022, \*\*\* short tons in interim 2022, and \*\*\* short tons in in interim 2023. *Id.* In addition to its direct imports, \*\*\* also purchased subject imports during the POI. These purchases were also relatively small relative to its U.S. production, however. CR/PR at Table III-17.

<sup>151</sup> CR/PR at Table III-16.

volume.<sup>152</sup> \*\*\*.<sup>153</sup> \*\*\* imported subject merchandise from \*\*\* in 2022.<sup>154</sup> The ratio of its subject imports to its domestic production was \*\*\* percent in 2022.<sup>155</sup> \*\*\* explained that it “\*\*\*.”<sup>156</sup>

Given that \*\*\* only imported subject merchandise in 2022, when its ratio of subject imports to domestic production was \*\*\*, its primary interest appears to be in domestic production. Given this, and that no party supports its exclusion from the domestic industry, we find that appropriate circumstances do not exist to exclude \*\*\* from the domestic industry.

\*\*\*. \*\*\* qualifies as a related party because its parent company, \*\*\*, is an importer of aluminum extrusions from subject sources.<sup>157</sup> \*\*\* accounted for \*\*\* percent of U.S. production of aluminum extrusions in 2022 and was the \*\*\* of the 29 reporting U.S. producers that year in terms of U.S. production volume.<sup>158</sup> It reported \*\*\*.<sup>159</sup> \*\*\* imported \*\*\* small quantities of subject merchandise from \*\*\* in 2020, 2021 and 2022.<sup>160</sup> The ratio of its parent company’s subject imports to its domestic production was less than \*\*\* during the POI.<sup>161</sup> \*\*\* company explained that it \*\*\*.<sup>162</sup>

Given that the ratio of its \*\*\* subject imports to \*\*\* domestic production was \*\*\* throughout the POI, and that \*\*\* imported no subject merchandise itself, \*\*\* primary interest appears to be in domestic production. In light of this, and the fact that no party supports its exclusion from the domestic industry, we find that appropriate circumstances do not exist to exclude \*\*\* from the domestic industry.

\*\*\*. \*\*\* may qualify as related parties due to a third party’s control of the domestic producer and the importer/exporter of subject imports.<sup>163</sup> \*\*\* qualifies as a related party as it

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<sup>152</sup> CR/PR at Table III-1.

<sup>153</sup> CR/PR at Table III-1.

<sup>154</sup> CR/PR at Table III-14.

<sup>155</sup> CR/PR at Table III-14. \*\*\* subject imports from Mexico were \*\*\* short tons in 2022. *Id.*

<sup>156</sup> CR/PR at Table III-16.

<sup>157</sup> CR/PR at Tables III-2 and III-15; 19 U.S.C. § 1677(4)(B)(ii)(II).

<sup>158</sup> CR/PR at Table III-1.

<sup>159</sup> \*\*\* U.S. Producer Questionnaire at I-4. \*\*\*. *Id.*

<sup>160</sup> CR/PR at Table III-15.

<sup>161</sup> CR/PR at Table III-15. \*\*\* subject imports were only \*\*\* short tons in 2020, \*\*\* short ton in 2021 and \*\*\* short tons in 2022. *Id.*

<sup>162</sup> CR/PR at Table III-16.

<sup>163</sup> Domestic producer \*\*\* reported that its “sister company,” \*\*\*, is an importer/exporter of subject merchandise from China. CR/PR at Table III-2; CR/PR at III-23 n.8. The Commission did not receive a questionnaire response from the importer, \*\*\*. To the extent a common parent company directly controls both \*\*\*, \*\*\* would qualify as a related party. CR/PR at Table III-2; CR/PR at III-23 n.8; 19 U.S.C. § 1677(4)(B)(ii)(III).

owns an exporter of subject merchandise in Mexico.<sup>164</sup> \*\*\* qualifies as a related party due to its ownership by \*\*\* which also owns \*\*\*, an importer/exporter of subject merchandise.<sup>165</sup> \*\*\* accounted for \*\*\* percent, \*\*\* percent, and \*\*\* percent, respectively, of U.S. production of aluminum extrusions in 2022.<sup>166</sup> \*\*\* was the \*\*\*, \*\*\* was the \*\*\*, and \*\*\* was the \*\*\* of the 29 reporting U.S. producers in 2022 based on U.S. production volume.<sup>167</sup> \*\*\* are petitioners, and \*\*\* supports \*\*\*.<sup>168</sup> The record contains no information concerning these producers' related importer's imports and related exporters' exports because importer \*\*\* (related to \*\*\*), and exporters \*\*\* (related to \*\*\*) did not provide questionnaire responses to the Commission. The information available indicates that \*\*\* did not import subject merchandise themselves, suggesting that their primary interest is in domestic production. There is no information on the record that including any of these domestic producers in the domestic industry would skew industry data, or that they are otherwise shielded from subject import competition by virtue of their related party status. In light of this, and the fact that no party supports their exclusion from the domestic industry, we find that appropriate circumstances do not exist to exclude \*\*\* from the domestic industry as related parties.

Accordingly, consistent with our definition of the domestic like product, we define the domestic industry to include all domestic producers of aluminum extrusions.

## V. Negligible Imports

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>169</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

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<sup>164</sup> CR/PR at Table III-2; CR/PR at III-23 n.8; 19 U.S.C. § 1677(4)(B)(ii)(I). The Commission did not receive a questionnaire response from the exporter in Mexico, \*\*\*.

<sup>165</sup> CR/PR at Table III-2; 19 U.S.C. § 1677(4)(B)(ii)(III). The Commission did not receive a questionnaire response from the exporter in Italy, \*\*\*.

<sup>166</sup> CR/PR at III-1.

<sup>167</sup> See CR/PR at Table III-1.

<sup>168</sup> CR/PR at Table III-1; \*\*\* U.S. Producer Questionnaire at I-4.

<sup>169</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)).



merchandise imported into the United States.<sup>170</sup> In the case of countervailing duty investigations involving developing countries (as designated by the United States Trade Representative (“USTR”)), the statute indicates that the negligibility thresholds are 4 percent and 9 percent, rather than 3 percent and 7 percent.<sup>171</sup>

#### **A. Arguments of the Parties**

*Petitioners’ Arguments.* Petitioners argue that imports from all 15 subject countries exceed the negligibility threshold, either individually or collectively.<sup>172</sup> They urge the Commission to rely on official import statistics for its negligibility and material injury analyses because, in their view, the available questionnaire data do not provide accurate data. More specifically, they argue data from the responses are overinclusive compared to official statistics in some years, and underinclusive in others. They claim that some importers reported obviously wrong data such as impossible unit values.<sup>173</sup>

Petitioners claim the questionnaire responses for the Dominican Republic in particular are unusable because they do not reflect nearly 30 percent of the import volumes shown in official import statistics. They maintain that official import statistics represent the best information on the record to measure subject import volumes, including for purposes of negligibility.<sup>174</sup>

Petitioners acknowledge that under the terms of the of the CAFTA-DR Agreement, the Dominican Republic is to be considered a beneficiary country under the Caribbean Basin Economic Recovery Act (“CBERA”) for purposes of 19 U.S.C. § 1677(7)(G)(ii)(III) and 19 U.S.C. § 1677(7)(H), which provide that CBERA countries may not be cumulated with imports from non-CBERA countries for purposes of material injury or threat of material injury when the Commission makes a determination with respect to CBERA countries.<sup>175</sup> They argue, however, that the Commission may find that Dominican Republic need not be considered a beneficiary

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<sup>170</sup> 19 U.S.C. § 1677(24)(A)(ii).

<sup>171</sup> 19 U.S.C. § 1677(24)(B). China, Indonesia, Mexico, and Turkey, the sources of imports subject to countervailing duty investigations, are not on USTR’s list of developing countries for purposes of applicability of the 4 percent and 9 percent negligibility limits. *See Designations of Developing Countries and Least-Developed Countries Under the Countervailing Duty Law*, 85 Fed. Reg. 7613 (Feb. 10, 2020).

<sup>172</sup> Petitioners’ Postconference Brief at 3-4.

<sup>173</sup> Petitioners’ Postconference Brief at 3-4.

<sup>174</sup> Petitioners’ Postconference Brief at 3-4. Petitioners claim that corrected questionnaire data would show that subject imports from the Dominican Republic increased from 28,647 short tons in 2020, to 62,114 tons in 2021, 40,444 tons in 2022, 13,364 short tons in interim 2022, and 35,777 tons in January-June 2023. Petitioners’ Postconference Brief at 17.

<sup>175</sup> Petitioners’ Postconference Brief, Exhibit 1 at 57-58. *Id.*

country for purposes of negligibility which is separately codified at 19 U.S.C. § 1677(24). They observe that the provision providing for an exception to aggregation of imports for negligibility refers back to 19 U.S.C. § 1677(7)(G)(ii) and states that in aggregating import volumes for negligibility, “the Commission shall not consider imports from any country specified in paragraph (7)(G)(ii).” They claim that the CAFTA-DR does not specifically reference 19 U.S.C. § 1677(24)(A)(iii), so the Commission could find that the exception to aggregation therefore does not apply.<sup>176</sup>

If the Commission finds subject imports from the Dominican Republic to be negligible and ineligible for aggregation for purposes of its negligibility determination, petitioners argue that the Commission should nonetheless find that subject imports from the Dominican Republic have the potential to exceed 3 percent in the imminent future. They argue that there has been an upward trend in subject imports from the Dominican Republic and that their calculations show that they have exceeded the 3 percent threshold in recent months.<sup>177</sup> Petitioners also argue that additional increases in subject imports from the Dominican Republic are likely because Kingtom Aluminio, the exporter in the Dominican Republic, is essentially a Chinese company that moved to the Dominican Republic to evade the existing orders on aluminum extrusions from China. Furthermore, they argue that U.S. Custom and Border Protection’s (“CBP’s”) latest ruling in June 2022, has encouraged additional subject imports from the Dominican Republic.<sup>178</sup>

*Respondents’ Arguments.* Kingtom asserts that the Commission should find that subject imports from the Dominican Republic are negligible. First, it observes that subject imports from the Dominican Republic are well below the 3 percent threshold in the 12 months preceding the petition. Kingtom submits that there is no clear trend in monthly volumes, and monthly volumes do not suggest that subject imports from the Dominican Republic will imminently

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<sup>176</sup> Petitioners’ Postconference Brief, Exhibit 1 at 57-58.

<sup>177</sup> Petitioners observe that in the Commission’s cold-rolled steel investigations in 2016, the Commission found that subject imports from India, while they did not meet the negligibility threshold for the most recent 12-month period as a whole, demonstrated the potential to exceed the threshold for a sustained period prior to the filing of the petitions, where they exceeded the threshold for the most recent six months. Petitioners’ Postconference Brief, Exhibit 1 at 60 (citing *Cold-Rolled Steel Flat Products from Brazil, India, Korea, Russia, and the United Kingdom*, Inv. Nos. 701-TA-540, 542-544 & 731-TA-1283, 1285, 1287, & 1289-1290 (Final), USITC Pub. 4637 (Sept. 2016) (“*Cold-Rolled Steel*”) at 9-10).

<sup>178</sup> Petitioners highlight that, in June 2022, CBP reversed an evasion finding against Kingtom, finding that the Kingtom’s exports of aluminum extrusions are instead Dominican Republic-origin. Petitioners claim that subject imports from the Dominican Republic have increased ever since that ruling. Petitioners’ Postconference Brief, Exhibit 1 at 60-61. See Petition at Exhibit I-19. See also CR/PR at VII-20 n.9.

exceed the 3 percent threshold for a sustained period.<sup>179</sup> It additionally argues that CBP and the courts found that its exports to the United States were not evading the existing orders on aluminum extrusions from China and it characterizes petitioners' arguments concerning the alleged Chinese origin of its exports as lacking any factual basis and inflammatory.<sup>180</sup>

## **B. Analysis**

We first consider what data to use for calculating import shares for purpose of our negligibility analysis. The coverage of the Commission's importer questionnaire data for 2022 was \*\*\* percent for all import sources and \*\*\* percent for subject imports.<sup>181</sup> The questionnaire coverage for imports from nonsubject sources was \*\*\* percent, and the coverage for subject imports from Colombia, Italy, and Thailand was below \*\*\* percent.<sup>182</sup> Given the low coverage afforded by importer questionnaire responses, the best information available on the record for purposes of negligibility calculations consists of official U.S. import statistics under the primary HTS numbers, adjusted by Commission staff to exclude out-of-scope merchandise and to include certain in-scope merchandise reported under other HTS numbers.<sup>183</sup>

Imports from six of the 15 subject countries are above the statutory negligibility threshold. Specifically, adjusted official import data indicate that from October 2022 through September 2023, the most recent 12-month period preceding the filing of the petitions, subject imports from China accounted for \*\*\* percent of total imports, subject imports from Colombia accounted for \*\*\* percent of total imports, subject imports from Indonesia accounted for \*\*\* percent of total imports, subject imports from Malaysia accounted for \*\*\* percent of total imports, subject imports from Mexico accounted for \*\*\* percent of total imports, and subject imports from Vietnam accounted for \*\*\* percent of total imports.<sup>184</sup> Consequently, we find that subject imports from these six countries are not negligible for purposes of the antidumping

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<sup>179</sup> Kingtom's Postconference Brief at 3-4.

<sup>180</sup> Kingtom's Postconference Brief at 4.

<sup>181</sup> CR/PR at IV-2.

<sup>182</sup> CR/PR at IV-2.

<sup>183</sup> The adjustments include removing aluminum extrusions subject to the existing orders on China; adding additional in-scope imports reported under other HTS numbers submitted in response to Commission questionnaires; removing out-of-scope merchandise based on responses to importer questionnaires; and removing data compiled from proprietary Census-edited, Customs records using the primary HTS numbers to remove imports reported by firms that certified that they do not import aluminum extrusions. CR/PR at Table IV-6.

<sup>184</sup> CR/PR at Table IV-6.

duty investigations and that subject imports from China, Indonesia, and Mexico are not negligible for purposes of the countervailing duty investigations.<sup>185</sup>

Subject imports from eight countries are below the 3 percent individual subject country statutory negligibility threshold in antidumping investigations and may be aggregated for the antidumping investigations. Adjusted official import data indicate that subject imports from Ecuador accounted for \*\*\* percent of total imports during the relevant period, subject imports from India accounted for \*\*\* percent of total imports, subject imports from Italy accounted for \*\*\* percent of total imports, subject imports from South Korea accounted for \*\*\* percent of total imports, subject imports from Taiwan accounted for \*\*\* percent of total imports, subject imports from Thailand accounted for \*\*\* percent of total imports, subject imports from Turkey accounted for \*\*\* percent of total imports, and subject imports from the UAE accounted for \*\*\* percent of total imports.<sup>186</sup> In the aggregate, imports from these eight countries subject to the antidumping duty investigations accounted for \*\*\* percent of total imports.<sup>187</sup> Because this exceeds the 7 percent statutory threshold pertinent to aggregated imports from individually negligible sources, we find that subject imports are not negligible with respect to the antidumping duty investigations on aluminum extrusions from Ecuador, India, Italy, South Korea, Taiwan, Thailand, Turkey, and the UAE.

The remaining issues are whether imports from the Dominican Republic subject to the antidumping duty investigation and imports from Turkey subject to the countervailing duty investigation may be aggregated with other individually negligible sources of subject imports or are otherwise negligible. We address negligibility for subject imports in these two investigations below.

*Dominican Republic.* Adjusted official import data indicate that subject imports from the Dominican Republic accounted for \*\*\* percent of total imports during the relevant negligibility period and are therefore negligible for purposes of present material injury.<sup>188</sup>

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<sup>185</sup> CR/PR at Table IV-6.

<sup>186</sup> CR/PR at Table IV-6.

<sup>187</sup> CR/PR at Table IV-6.

<sup>188</sup> CR/PR at Table IV-6. We recognize that unadjusted import statistics show subject imports from the Dominican Republic to be \*\*\* percent of total imports during the negligibility period. CR/PR at Table F-1. The import data in Table F-1 are only based on the primary HTS numbers. The data do not account for imports under the non-primary HTS numbers, out-of-scope merchandise reported in the primary HTS numbers that importers indicated was not in-scope, or merchandise from importers who certified in their questionnaire response that they had not imported in-scope merchandise. *Compare* CR/PR at Table IV-6 *with* Table F-1. The data in Table F-1 only reflect an adjustment using data submitted in response to Commission questionnaires to report subject and nonsubject imports from China. Accordingly, we find that the adjusted data in Table IV-6 are more accurate for determining import volumes for purposes of negligibility.

These imports would normally be subject to aggregation with other individually negligible imports in other antidumping investigations pursuant to 19 U.S.C. § 1677(24)(A)(ii). The negligibility provisions of the statute, however, provide for an exception to the aggregation of individually negligible imports for imports from a country that is a “beneficiary country” under CBERA.<sup>189</sup> The statute states that, “{i}n determining aggregate volume under clause (ii) or (iv), the Commission shall not consider imports from any country specified in paragraph (7)(G)(ii).”<sup>190</sup> Paragraph (7)(G)(ii) provides four exceptions to cumulation, including for any country designated as a “beneficiary country” under CBERA.<sup>191</sup>

Under the Dominican Republic-Central America-United States Free Trade Agreement (“CAFTA-DR”) and implementing legislation, the Dominican Republic remains treated as a CBERA beneficiary country for purposes of 19 U.S.C. §§ 1677(7)(G)(ii)(III) and 1677(7)(H).<sup>192</sup> Accordingly, because the Dominican Republic is to be treated as a CBERA beneficiary country for purposes of 19 U.S.C. §§ 1677(7)(G)(ii)(III), the exception to the aggregation of individually negligible imports in 19 U.S.C. § 1677(24)(A)(iii) which refers to “imports from any country specified in paragraph (7)(G)(ii)” remains applicable. Therefore, we find that subject imports from the Dominican Republic may not be aggregated with imports from other individually negligible countries.<sup>193</sup>

We must also consider whether there is any likelihood that different import numbers will arise in the final phase of these investigations showing that subject imports from the Dominican Republic exceed the 3 percent negligibility threshold in the negligibility period. Further adjustments to data for subject imports from the Dominican Republic or total imports

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<sup>189</sup> 19 U.S.C. § 1677(24)(A)(iii); 19 U.S.C. §§ 1677(7)(G)(ii)(III).

<sup>190</sup> 19 U.S.C. § 1677(24)(A)(iii).

<sup>191</sup> 19 U.S.C. § 1677(7)(G)(ii)(III).

<sup>192</sup> 19 U.S.C. § 4031(a)(3)(B)(i). Article 8.8 of the CAFTA-DR states that “{t}he United States shall continue to treat each other Party as a ‘beneficiary country’ for purposes of 19 U.S.C. §§ 1677(7)(G)(ii)(III) and 1677(7)(H) and any successor provisions.” *See also* Dominican Republic—Central America—United States Free Trade Agreement Implementation Act, Public Law 109-53, 119 Stat. 462.

<sup>193</sup> Petitioners initially acknowledged that the exception to the aggregation of imports from individually negligible countries applies to the Dominican Republic. Petition at 37 n.69. In their postconference brief, however, they argue that the CAFTA-DR does not specifically reference 19 U.S.C. § 1677(24)(A)(iii), so the Commission could find the exception does not apply to negligibility. Petitioners’ Postconference Brief, Exhibit 1 at 58. We disagree. Although 19 U.S.C. § 4031(a)(3)(B)(i) does not specifically refer to the negligibility provisions of the statute concerning aggregation of individually negligible imports, it references the exception contained in 19 U.S.C. § 1677(7)(G)(ii)(III) for CBERA beneficiary countries. The negligibility provision specifically refers to the exceptions contained in 19 U.S.C. § 1677(7)(G)(ii) which includes the exception for CBERA beneficiary countries. We therefore find that the exception to the aggregation of individually negligible imports applies with respect to subject imports from the Dominican Republic.

are possible. Nonetheless, any such changes are unlikely to increase subject imports from the Dominican Republic as a share of total imports from \*\*\* percent based on the record of the preliminary phase of the investigations to the 3 percent required for them to be found not negligible.<sup>194</sup> Accordingly, we find that no likelihood exists for contrary evidence concerning the level of subject imports from the Dominican Republic to arise in any final phase of these investigations that would make them non-negligible for purposes of present material injury.

We next examine whether subject imports from the Dominican Republic are negligible for purposes of a threat analysis. In considering whether subject imports have the potential to imminently exceed the 3 percent threshold, the Commission has considered whether such imports have exceeded the statutory threshold for a sustained period prior to filing of the petition.<sup>195</sup> Based on adjusted official import statistics, subject imports from the Dominican Republic never accounted for over 3 percent of total imports during any of the 21 rolling 12-month periods preceding the filing of the petition.<sup>196</sup> Further, in the 12 months of the negligibility period, subject imports from the Dominican Republic exceeded 3 percent of total imports calculated on a monthly basis only in July 2023, at \*\*\* percent, before falling to smaller shares in August 2023 (\*\*\* percent) and September 2023 (\*\*\* percent).<sup>197</sup> Although subject imports from the Dominican Republic as a share of total imports trended upwards during 2023, this trend alone does not indicate that they have the potential to imminently exceed 3 percent of total imports.<sup>198</sup>

Other evidence in the record also indicates that subject imports from the Dominican Republic do not have the potential to exceed the 3 percent negligibility threshold in the imminent future. The industry in the Dominican Republic is relatively small. As an exporter of aluminum extrusions, it ranked last among the subject exporters by total exports of aluminum extrusions.<sup>199</sup> The production capacity for the only responding foreign producer in the

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<sup>194</sup> We note that the adjustments made in this preliminary phase decreased the volume of subject imports from the Dominican Republic and increased the volume of total imports of aluminum extrusions. *Compare* CR/PR at Table IV-6 (adjusted negligibility period data) *with* Table F-1 (unadjusted negligibility period data).

<sup>195</sup> *See, e.g., Cold-Rolled Steel*, USITC Pub. 4637 at 9 (subject imports from India exceeded statutory negligibility threshold for final six months of 12-month negligibility period).

<sup>196</sup> *See* CR/PR at Table IV-7.

<sup>197</sup> *See* Staff Worksheet IV-2 and Fig. IV-1, EDIS Doc. ID 809208.

<sup>198</sup> *See* CR/PR at Table IV-7 and Staff Worksheet Fig. IV-2, EDIS Doc. ID 809208. As discussed below, the increase in subject imports from the Dominican Republic in interim 2023 compared to interim 2022 resulted, in part, from \*\*\*. Foreign Producers' Questionnaire Response of Kington at Question II-3f. Even after the increase, subject imports from the Dominican Republic accounted for only \*\*\* percent of total imports in interim 2023. CR/PR at Table IV-2.

<sup>199</sup> *See* CR/PR at Table VII-9 (Global Atlas Trade ("GTA") data).

Dominican Republic, Kingtom,<sup>200</sup> remained constant throughout the POI at \*\*\* short tons while its production fluctuated, increasing \*\*\* percent from 2020 to 2021 and then decreasing by \*\*\* percent from 2021 to 2022, although it was \*\*\* percent higher in interim 2023 compared to interim 2022.<sup>201</sup> The responding firm's capacity utilization decreased from 2020 to 2022 but was higher in interim 2023 than in interim 2022; it reported \*\*\* short tons of excess capacity in 2022, but only \*\*\* short tons of excess capacity in interim 2023.<sup>202</sup> Kingtom explained that \*\*\*.<sup>203 204</sup>

Kingtom reported that its exports to the United States increased from 2020 to 2021, declined in 2022, when they accounted for \*\*\* of its total shipments, and were higher in interim 2023, at \*\*\* percent of total shipments, than in interim 2022.<sup>205</sup> As exports to the United States accounted for a large majority of Kingtom's total shipments, its ability to shift sales from its home market or third-country markets to the United States is limited.<sup>206</sup> Adjusted official import statistics show that subject imports from the Dominican Republic accounted for \*\*\* percent of total imports in 2021.<sup>207</sup> Subject imports from the Dominican Republic accounted for \*\*\* percent of total imports in interim 2023, less than their \*\*\* percent share during the negligibility period.<sup>208</sup>

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<sup>200</sup> Kingtom's exports to the United States accounted for \*\*\* percent of adjusted official U.S. imports of aluminum extrusions in 2022, and Kingtom estimates that it accounted for \*\*\* percent of total production of aluminum extrusions in the Dominican Republic in 2022. CR/PR at VII-4-5. In interim 2023, however, Kingtom's exports to the United States of \*\*\* short tons were equivalent to \*\*\* percent of the \*\*\* short tons of subject imports from the Dominican Republic. CR/PR at Tables IV-2 and H-1. Petitioners identified one other producer of aluminum extrusions in the Dominican Republic, International Dominican Aluminum, which did not respond to the Commission's foreign producer questionnaire. Petitioners' Postconference Brief, Exhibit 1 at 75.

<sup>201</sup> CR/PR at Table VII-6.

<sup>202</sup> CR/PR at Table VII-6.

<sup>203</sup> Kingtom's Foreign Producer Questionnaire at II-3f. See CR/PR at Table H-1 (practical capacity utilization of \*\*\* percent in interim 2023 compared to \*\*\* percent in 2022).

<sup>204</sup> Petitioners also contend that subject imports from the Dominican Republic increased in response to CBP's ruling in June 2022, reversing a finding of evasion of the orders on aluminum extrusions from China by transshipment through the Dominican Republic. CR/PR at VII-20 n.9. As discussed above, the trend in subject imports from the Dominican Republic reflects the \*\*\*. We have found that the trend in subject imports \*\*\* are not indicative of any potential for such imports to exceed 3 percent of total imports in the imminent future.

<sup>205</sup> CR/PR at Table H-2. Kingtom projects that its export volumes will return to \*\*\* levels in 2023 and 2024. *Id.*

<sup>206</sup> See CR/PR at Table H-2.

<sup>207</sup> CR/PR at Table IV-2.

<sup>208</sup> CR/PR at Tables IV-2 and IV-6.

Subject imports from the Dominican Republic account for \*\*\* percent of all reported arranged imports for October 2023 to March 2024.<sup>209</sup> Arranged imports from the Dominican Republic were lower in the fourth quarter of 2023 than in the third quarter, however, and were zero in the first and second quarters of 2024 – unlike imports from other subject sources, which increased in the fourth quarter of 2023, and were positive for the majority of subject sources in both the first and second quarters of 2024.<sup>210</sup>

We further observe that during the period, subject imports from the Dominican Republic would have needed to be \*\*\* percent higher to have accounted for 3 percent of total imports of aluminum extrusions.<sup>211</sup> We find no indication on the record in this preliminary phase investigation that subject imports from the Dominican Republic are likely to imminently increase to that degree. Indeed, the information reviewed in the previous paragraphs suggests the contrary.

Based upon the trend in subject imports from the Dominican Republic as a share of total imports and the small size of the industry and its exports, among other evidence, we find that subject imports from the Dominican Republic do not have the potential to exceed the 3 percent negligibility threshold in the imminent future. We therefore terminate the investigation with respect to imports from the Dominican Republic.

*Turkey.* As previously stated, subject imports from Turkey accounted for \*\*\* percent of total imports over the relevant period, which is below the applicable 3 percent negligibility threshold. There are no subject imports from any country subject to a countervailing duty investigation that are eligible to be aggregated with those from Turkey for purposes of the 7 percent statutory threshold because subject imports from China, Indonesia, and Mexico, the other countries subject to countervailing duty investigations, individually exceed the 3 percent negligibility threshold. The Commission has consistently found that it may not aggregate individually negligible subject imports in countervailing duty investigations with subject imports that are individually negligible in antidumping duty investigations.<sup>212</sup> We consequently find

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<sup>209</sup> See CR/PR at Table VII-11. Kingtom reported that its end-of-period inventories were \*\*\* short tons in interim 2023, lower than the \*\*\* short tons reported in interim 2022. CR/PR at Table H-2.

<sup>210</sup> See CR/PR at Table VII-12.

<sup>211</sup> See CR/PR at Table IV-6 (3 percent of \*\*\* short tons).

<sup>212</sup> See, e.g., *Large Diameter Welded Pipe from Canada, Greece, Korea, and Turkey*, Inv. Nos. 701-TA-595-596 and 731-TA-1401, 1403, 1405-1406 (Final), USITC Pub. 4883 (Apr. 2019) at 10 n.25; *Cold-Rolled Steel Flat Products from Brazil, India, Korea, Russia, and the United Kingdom*, Inv. Nos. 701-TA-540, 542-544 and 731-TA-1283, 1285, 1287, and 1289-1290 (Final), USITC Pub. 4637 (Sept. 2016) at 13 n.69; *Certain Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey*, Inv. Nos. 701-TA-559-561 and 731-TA- (Continued...)



that subject imports from Turkey are negligible for purposes of present material injury in the countervailing duty investigation.

We next examine whether imports from Turkey subject to the countervailing duty investigation are negligible for purposes of a threat analysis. In considering whether such subject imports have the potential imminently to exceed the negligibility threshold, the Commission has considered whether such imports have exceeded the statutory threshold for a sustained period prior to filing of the petition.<sup>213</sup> We observe that based on adjusted official import statistics, subject imports from Turkey accounted for over 3 percent of total imports during all 20 previous rolling 12-month periods with the exception of the 12-month negligibility period ending in September 2023, when they dipped \*\*\* below the 3 percent threshold.<sup>214</sup> Notwithstanding their \*\*\* percent share of total imports during this 12-month period, over the 12 months from October 2022 to September 2023, subject imports from Turkey exceeded 3 percent of total imports calculated on a monthly basis in 10 of 12 months.<sup>215</sup> Further, during the last five months of the period, May 2023 to September 2023, subject imports from Turkey exceeded 3 percent of total imports.<sup>216</sup>

Other evidence on the record indicates that subject imports from Turkey are likely to remain at or over 3 percent of total imports. The industry in Turkey is a leading exporter of aluminum extrusions, ranking second behind only China in world exports of aluminum extrusions.<sup>217</sup> Turkish producers' capacity and production also increased overall by \*\*\* percent and \*\*\* percent, respectively, during 2020 to 2022, and although the industry's capacity utilization increased over the same period, it reported \*\*\* short tons of excess capacity at the end of 2022.<sup>218</sup> The industry in Turkey reported that its end-of-period inventories of aluminum extrusions \*\*\* from 2020 to 2022, although they were \*\*\* in interim 2023 than interim 2022.<sup>219</sup> For these reasons, we find that imports from Turkey subject to the countervailing duty investigation have the potential to exceed the 3 percent negligibility threshold in the imminent future, and are therefore not negligible for purposes of threat of material injury.

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1317-1328 (Preliminary), USITC Pub. 4615 (May 2016) at 22-23. *See also Nucor Corp. v. United States*, 296 F. Supp.3d 1276 (CIT 2018) (affirming Commission's separate treatment of dumped and subsidized imports for negligibility).

<sup>213</sup> *See, e.g., Cold-Rolled Steel*, USITC Pub. 4637 at 9 (subject imports from India exceeded statutory negligibility threshold for final six months of 12-month negligibility period).

<sup>214</sup> CR/PR at Table IV-8.

<sup>215</sup> *See* Staff Worksheet IV-3, EDIS Doc. ID 809208.

<sup>216</sup> *See* Staff Worksheet IV-3, EDIS Doc. ID 809208.

<sup>217</sup> *See* CR/PR at Table VII-13 (Global Atlas Trade ("GTA") data).

<sup>218</sup> CR/PR at Table VII-6.

<sup>219</sup> *See* CR/PR at Table VII-10.

## VI. Cumulation

For purposes of evaluating the volume and effects for a determination of reasonable indication 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>220</sup>

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>221</sup> Only a “reasonable overlap” of competition is required.<sup>222</sup>

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<sup>220</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).

<sup>221</sup> See, e.g., *Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int’l Trade 1989).

<sup>222</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*, 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.”).

## A. Arguments of the Parties

*Petitioners' Argument.* Petitioners argue that the Commission should cumulate subject imports from all subject countries. They argue that aluminum extrusions from subject countries and the domestic producers are highly interchangeable with each other because they are made to customers' specifications. Petitioners also assert that U.S. producers and U.S. importers reported subject imports and domestically produced aluminum extrusions are sold nationwide and in the same channels of distribution, both to end users and distributors. Finally, they observe that monthly data for the POI show that subject imports from each country entered the United States in every single month of the POI.<sup>223</sup>

*Respondents' Argument.* Respondents do not address cumulation for present material injury other than to observe that subject imports from the Dominican Republic may not be cumulated with other subject imports for purposes of determining material injury with respect to subject imports from the Dominican Republic.<sup>224</sup>

## B. Analysis

We consider subject imports from China, Colombia, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, South Korea, Taiwan, Thailand, Turkey,<sup>225</sup> the UAE, and Vietnam, on a cumulated basis, because the statutory criteria for cumulation are satisfied. As an initial matter, petitioners filed the antidumping and countervailing duty petitions with respect to all 14 countries on the same day, October 4, 2023.<sup>226</sup>

*Fungibility.* The record indicates that there is a substantial degree of fungibility between and among domestically produced aluminum extrusions and imports from each subject country. A large majority of responding U.S. producers reported that imported product from all sources of subject imports was "always" interchangeable with the domestic like product.<sup>227</sup>

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<sup>223</sup> Petitioners' Postconference Brief at 5-8.

<sup>224</sup> Kingtom's Postconference Brief at 2.

<sup>225</sup> Having found imports from Turkey subject to the antidumping duty investigation non-negligible for purposes of present material injury, we consider such imports in our cumulation analysis. We do not consider allegedly subsidized subject imports from Turkey in our analysis, however, having found such imports negligible for purposes of present material injury.

<sup>226</sup> Subject imports from the Dominican Republic may not be cumulated because we have terminated the investigation. 19 U.S.C. § 1677(7)(G)((ii)(II).

<sup>227</sup> CR/PR at Table II-9.

Most responding U.S. importers reported that imported product from all sources of subject imports was either “always” or “frequently” interchangeable with the domestic like product.<sup>228</sup>

Furthermore, the record indicates that subject imports from each subject country for which data are available overlapped with the domestic like product in terms alloy series and finish. The vast majority (\*\*\*) percent) of U.S. shipments of the domestic product and subject imports (\*\*\*) percent) consisted of aluminum extrusions made from the 6000 series alloys during 2022.<sup>229</sup> Only for two sources of subject imports, China at \*\*\* percent and Thailand at \*\*\* percent, was the percentage of aluminum extrusions produced from 6000 series alloys under \*\*\* percent.<sup>230</sup> With respect to finish, U.S. producers shipped both anodized/finished and unworked aluminum extrusions, with most shipments from U.S. producers being unworked (\*\*\*) percent).<sup>231</sup> Most shipments of imports from subject sources were anodized/finished (\*\*\*) percent) and anodized/finished aluminum extrusions accounted for a \*\*\* of shipments from each subject source with only one exception; \*\*\* percent of shipments of subject imports from the UAE were comprised of anodized/finished products.<sup>232</sup> Thus, the record indicates that there is a sufficient degree of fungibility between subject imports and the domestic like product for purposes of cumulation.

*Channels of Distribution.* Although the majority of U.S. producers’ U.S. shipments were to end users, they also made a significant share of their U.S. shipments to distributors, ranging from \*\*\* percent to \*\*\* percent during the 2020-2022 period.<sup>233</sup>

With the exception of a few subject sources, importers made substantial shares of their U.S. shipments to both end users and distributors.<sup>234</sup> Responding importers made substantial shares of their U.S. shipments of subject imports from Ecuador, India, Indonesia, Italy, Malaysia, Mexico, Taiwan, Thailand, Turkey, and Vietnam to both end users and distributors.<sup>235</sup> Thus, the domestic like product and subject imports from 11 of the 14 countries substantially overlapped in terms of U.S. shipments to both end users and distributors.<sup>236</sup>

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<sup>228</sup> CR/PR at Table II-10. There are no questionnaire data regarding U.S. producers’ and importers’ evaluations of the interchangeability of subject imports from subject countries with those from other subject countries.

<sup>229</sup> CR/PR at Table IV-9.

<sup>230</sup> CR/PR at Table IV-9.

<sup>231</sup> CR/PR at Table IV-10.

<sup>232</sup> CR/PR at Table IV-10.

<sup>233</sup> CR/PR at Table II-1.

<sup>234</sup> CR/PR at Table II-1.

<sup>235</sup> CR/PR at Table II-1.

<sup>236</sup> See CR/PR at Table II-1.

Shipments of imports from the remaining four subject countries were more concentrated to either end users or distributors. The percentage of U.S. shipments from China and South Korea to end users was over \*\*\* percent during the 2020-2022 period, and the percentage of U.S. shipments of subject imports from Colombia and the UAE to distributors was over \*\*\* percent during the majority of the 2020-2022 period.<sup>237</sup> Shipments of subject imports from these four subject countries (China, Colombia, South Korea, and the UAE) therefore substantially overlapped with shipments of the domestic like product and subject imports from 12 of 14 subject countries for sales to either end users or distributors.<sup>238</sup>

*Geographic Overlap.* U.S. producers reported selling aluminum extrusions to all regions in the contiguous United States, as did importers of subject merchandise from the 14 subject countries eligible for cumulation.<sup>239</sup> The single responding importer from Colombia reported selling in three of six regions: the Northeast, Southeast, and Pacific regions.<sup>240</sup> Official import statistics also indicate that imports from Colombia, as well as imports from 13 other subject countries eligible for cumulation, entered the United States through ports located in each of the West, East, and South regions.<sup>241</sup>

*Simultaneous Presence in Market.* The domestic like product and imports from all subject sources were present in the U.S. market in all 42 months of the POI.<sup>242</sup>

*Conclusion.* The record of the preliminary phase of the investigations indicates that subject imports from China, Colombia, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, South Korea, Taiwan, Thailand, Turkey, the UAE, and Vietnam are generally fungible with the domestic like product and each other. The record also indicates that imports from each of the subject countries and the domestic like product were generally sold in overlapping channels of distribution and geographic markets and were simultaneously present in the U.S. market during the POI. Because there is reasonable overlap of competition between and among subject imports from China, Colombia, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, South Korea, Taiwan, Thailand, Turkey, the UAE, and Vietnam and the domestic like product, we cumulate subject imports from these sources for our analysis of whether there is a reasonable indication of material injury by reason of subject imports.

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<sup>237</sup> See CR/PR at Table II-1.

<sup>238</sup> See CR/PR at Table II-1.

<sup>239</sup> CR/PR at Table II-2.

<sup>240</sup> CR/PR at Table II-2.

<sup>241</sup> See CR/PR at Table IV-11.

<sup>242</sup> See CR/PR at Tables IV-12 and V-6 to V-9.

## VII. Reasonable Indication of Material Injury by Reason of Subject Imports

### A. Legal Standard

In the preliminary phase of antidumping and countervailing duty investigations, the Commission determines whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.<sup>243</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>244</sup> The statute defines “material injury” as “harm which is not inconsequential, immaterial, or unimportant.”<sup>245</sup> In assessing whether there is a reasonable indication that 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>246</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>247</sup>

Although the statute requires the Commission to determine whether there is a reasonable indication that the domestic industry is “materially injured or threatened with material injury by reason of” unfairly traded imports,<sup>248</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>249</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

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<sup>243</sup> 19 U.S.C. §§ 1671b(a), 1673b(a).

<sup>244</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>245</sup> 19 U.S.C. § 1677(7)(A).

<sup>246</sup> 19 U.S.C. § 1677(7)(C)(iii).

<sup>247</sup> 19 U.S.C. § 1677(7)(C)(iii).

<sup>248</sup> 19 U.S.C. §§ 1671b(a), 1673b(a).

<sup>249</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).

tangential cause of injury and that there is a sufficient causal, not merely a temporal, nexus between subject imports and material injury.<sup>250</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 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>251</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>252</sup> Nor does

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<sup>250</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).

<sup>251</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>252</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 (Continued...)

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>253</sup> It is clear that the existence of injury caused by other factors does not compel a negative determination.<sup>254</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>255</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>256</sup> The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed “rigid adherence to a specific formula.”<sup>257</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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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>253</sup> S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

<sup>254</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>255</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 comporting with the Court’s guidance in *Mittal*.

<sup>256</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>257</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>258</sup> Congress has delegated this factual finding to the Commission because of the agency’s institutional expertise in resolving injury issues.<sup>259</sup>

## **B. Conditions of Competition and the Business Cycle**

The following conditions of competition inform our analysis of whether there is a reasonable indication of material injury or threat of material injury by reason of subject imports.

### **1. Demand Conditions**

Aluminum extrusions are used in a wide variety of applications, including building and construction (*e.g.*, windows, door railings, curtain walls, highway and bridge construction), transportation (*e.g.*, automotive and electric vehicles, aircraft, rail), solar projects (*e.g.*, frames and structural fasteners), and engineered production applications (*e.g.*, air conditioners, appliances, lighting, refrigeration).<sup>260</sup> Aluminum extrusions are extensively used in residential and non-residential construction and automobile production, but because of the wide variety of applications for aluminum extrusions, a variety of industries influence demand.<sup>261</sup>

Demand for aluminum extrusions, which is derived from demand for its various end uses, generally tracks the U.S. economy.<sup>262</sup> Demand typically increases in spring and summer, particularly in the construction, automotive, and recreational vehicle industries.<sup>263</sup>

During the POI, automobile production and residential construction, major drivers of demand for aluminum extrusions, initially declined as a result of the COVID-19 pandemic before recovering.<sup>264</sup> Most responding domestic producers reported a decrease or fluctuating decline in U.S. demand for aluminum extrusions during the POI while most responding U.S. importers reported an increase or fluctuating increase in U.S. demand.<sup>265</sup> Petitioners contend that

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<sup>258</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>259</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>260</sup> CR/PR at II-1.

<sup>261</sup> CR/PR at II-12.

<sup>262</sup> CR/PR at II-12.

<sup>263</sup> CR/PR at II-12.

<sup>264</sup> CR/PR at II-12-13, II-18, V-46.

<sup>265</sup> CR/PR at Table II-7.

apparent U.S. consumption is forecast to decline due to weakening demand for aluminum extrusions in the building and construction industries.<sup>266</sup>

Apparent U.S. consumption by quantity increased by 25.7 percent between 2020 and 2022, increasing from 1.9 million short tons in 2020 to 2.3 million short tons in 2021 and 2.4 million short tons in 2022.<sup>267</sup> Apparent U.S. consumption was 1.1 million short tons in interim 2023, as compared with 1.2 million short tons in interim 2022.<sup>268</sup>

## 2. Supply Conditions

The domestic industry remained the largest supplier to the U.S. market throughout POI, although its share of apparent U.S. consumption declined. Its market share fell from 60.2 percent in 2020 to 56.7 percent in 2021 and 53.4 percent in 2022.<sup>269</sup> Its share was 53.7 percent in interim 2023, as compared with 54.9 percent in interim 2022.<sup>270</sup>

There were several changes to the domestic industry during the POI. In 2021, domestic producers Aluminum Insights and APEL Extrusions announced they would open new production facilities, and Alexandria Industries completed the installation of a new extrusion press line.<sup>271</sup> Bunting announced it would open a production facility and Western Extrusions announced the reopening of an idled facility during 2022.<sup>272</sup> The domestic industry increased its production capacity over the POI. Its practical capacity increased from 1.6 million short tons in 2020 to 1.7 million short tons in 2021 and 2022.<sup>273</sup>

Subject imports were the second-largest source of supply to the U.S. market during the POI and their share of apparent U.S. consumption increased from \*\*\* percent in 2020 to \*\*\*

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<sup>266</sup> Petitioners cite a report from an industry publication indicating apparent U.S. consumption is expected to decline \*\*\* percent in 2023 and \*\*\* percent in 2024. Petitioners' Postconference Brief, Exhibit 1 at 63 and Exhibit 6 (citing \*\*\*).

<sup>267</sup> CR/PR at Tables IV-13, C-1.

<sup>268</sup> CR/PR at Tables IV-13, C-1. Thus, apparent U.S. consumption was 12.5 percent lower in interim 2023 compared to interim 2022. *Id.*

<sup>269</sup> CR/PR at Tables IV-13, C-1. Therefore, the domestic industry's share of apparent U.S. consumption declined 6.8 percentage points from 2020 to 2023. *Id.*

<sup>270</sup> CR/PR at Tables IV-13, C-1. Accordingly, the domestic industry's share of U.S. apparent consumption was 1.2 percentage points lower in interim 2023 compared with interim 2022. *Id.*

<sup>271</sup> CR/PR at Table III-3.

<sup>272</sup> CR/PR at Table III-3.

<sup>273</sup> CR/PR at Table III-5. Its practical capacity was 844,057 short tons in interim 2022 and 861,422 short tons in interim 2023. *Id.*

percent in 2021 and \*\*\* percent in 2022.<sup>274</sup> Their share was \*\*\* percent in interim 2023, as compared with \*\*\* percent in interim 2022.<sup>275</sup>

Nonsubject imports were the third-largest source of supply to the U.S. market during the POI, and their share of apparent U.S. consumption increased from \*\*\* percent in 2020 to \*\*\* percent in 2021 before decreasing to \*\*\* percent in 2022.<sup>276</sup> Their share was \*\*\* percent in interim 2023, as compared with \*\*\* percent in interim 2022.<sup>277</sup>

Twenty-two of 29 responding U.S. producers and 34 of 59 responding importers reported that they had experienced supply constraints during the POI. The domestic industry attributed its supply problems to labor shortages, over-buying by customers resulting in supply shortages in the market, import competition, capacity constraints, and the impact of the COVID-19 pandemic on operations and supply chains.<sup>278</sup> Importers reported that the COVID-19 led to extended lead times, allocation restrictions, and shipping delays.<sup>279</sup>

### 3. Substitutability and Other Conditions

Based on the record of the preliminary phase of the investigations, we find that there is a moderate-to-high degree of substitutability between domestically produced aluminum extrusions and subject imports when made to the same specifications.<sup>280</sup> Most responding U.S. producers reported that U.S. product was always interchangeable with aluminum extrusions from subject sources,<sup>281</sup> while most responding U.S. importers reported that U.S. product was either always or frequently interchangeable with aluminum extrusions from subject sources.<sup>282</sup>

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<sup>274</sup> CR/PR at Tables IV-13, C-1 (not including the Dominican Republic). Thus, subject imports' share of apparent U.S. consumption increased \*\*\* percentage points from 2020 to 2022. *Id.*

<sup>275</sup> CR/PR at Tables IV-13, C-1 (not including the Dominican Republic). Therefore, subject imports' share of U.S. apparent consumption was \*\*\* percentage points higher in interim 2023 compared with interim 2022. *Id.*

<sup>276</sup> CR/PR at Tables IV-13, C-1 (including imports from the Dominican Republic). Accordingly, nonsubject imports' share of apparent U.S. consumption declined \*\*\* percentage points from 2020 to 2022. *Id.*

<sup>277</sup> CR/PR at Tables IV-13, C-1. Therefore, nonsubject imports' share of U.S. apparent consumption was \*\*\* percentage points higher in interim 2023 compared with interim 2022. *Id.*

<sup>278</sup> CR/PR at II-10.

<sup>279</sup> CR/PR at II-10.

<sup>280</sup> See CR/PR at II-20.

<sup>281</sup> CR/PR at Table II-9

<sup>282</sup> CR/PR at Table II-10. Petitioners argue that petitioning coalition members produce \*\*\* of \*\*\* products meeting the scope definition and that they are able to produce the remaining \*\*\* products with no investment. Petitioners' Postconference Brief, Exhibit 1 at 11-12.

The current record also indicates that price is an important factor in purchasing decisions for aluminum extrusions, among other important factors. Purchasers responding to the lost sales/lost revenue survey most frequently cited quality as their top purchasing factor, followed by price and availability.<sup>283</sup> Nearly all responding domestic producers indicated that differences other than price were sometimes or never significant in sales of the domestic like product and subject imports from each source.<sup>284</sup> While importers' responses were more mixed, a majority also indicated that differences other than price were only sometimes or never significant in sales of the domestic like product and subject imports from each country.<sup>285</sup>

Domestic producers reported that 92.8 percent of their commercial shipments were made-to-order (as opposed to coming from inventory), with lead times averaging 30 days.<sup>286</sup> Importers reported 85.7 percent of their commercial shipments were produced-to-order with lead times averaging 52 days.<sup>287</sup>

Domestic producers and importers sold aluminum extrusions through a combination of spot market sales and short term, annual, and long-term contracts.<sup>288</sup> U.S. producers mostly sold aluminum extrusions in the spot market, with lesser, but substantial, quantities sold under contracts of varying length.<sup>289</sup> Importers mostly sold subject merchandise through contracts, mostly pursuant to long-term contracts.<sup>290</sup>

Aluminum is the primary raw material used to produce aluminum extrusions.<sup>291</sup> The Midwest price of aluminum increased from \$\*\*\* per pound in May 2020 to \$\*\*\* in March 2022 and generally decreased thereafter.<sup>292</sup> Raw materials accounted for 58.7 percent of the domestic industry's cost of goods sold ("COGS") for aluminum extrusions in 2020, 64.8 percent in 2021, and 67.7 percent in 2022.<sup>293</sup>

As discussed above, the scope of these investigations is similar to the scope of the antidumping and countervailing duty orders covering certain aluminum extrusions from China. Aluminum extrusions from China subject to the existing orders are excluded from the scope of

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<sup>283</sup> CR/PR at Table II-8.

<sup>284</sup> CR/PR at Table II-11.

<sup>285</sup> CR/PR at Table II-12.

<sup>286</sup> CR/PR at II-21.

<sup>287</sup> CR/PR at II-21.

<sup>288</sup> CR/PR at Table V-4.

<sup>289</sup> CR/PR at Table V-4

<sup>290</sup> CR/PR at Table V-4

<sup>291</sup> CR/PR at V-1.

<sup>292</sup> CR/PR at Table V-1 and Fig. V-1.

<sup>293</sup> CR/PR at Table VI-1. Raw materials accounted for 63.3 percent of COGS in interim 2023, compared to 70.8 percent in interim 2022. *Id.*

the investigations, and such imports are classified as nonsubject imports in these investigations and entered the U.S. market in limited quantities during the POI.<sup>294</sup>

During the POI, subject merchandise from China entering under HTS subheading 7610.90.00 were subject to additional 25 percent *ad valorem* duties pursuant to section 301 of the Tariff Act of 1974<sup>295</sup> (“Section 301”).<sup>296</sup> Since February 2020, subject merchandise from China entering under HTS subheadings 7604.10.10, 7604.10.30, 7604.10.50, 7604.21.00, 604.29.10, 7604.29.30, 7604.29.50, 7608.10.00, 7608.20.00, 7609.00.00, and 7610.10.00 have been subject to an additional 7.5 percent *ad valorem* duties pursuant to Section 301.<sup>297</sup>

During the POI, aluminum extrusions imported under HTS headings 7604, 7608, and 7609 originating in China, Colombia, the Dominican Republic, Ecuador, India, Indonesia, Malaysia, South Korea, Taiwan, Thailand, Turkey, the UAE, and Vietnam have been subject to an additional 10 percent *ad valorem* duty under section 232 of the Trade Expansion Act of 1962, as amended (“Section 232”).<sup>298</sup> Subject imports from Italy (and other EU countries) imported under HTS headings 7604, 7608, and 7609 became subject to a tariff-rate quotas (TRQs) on January 1, 2022.<sup>299</sup> Subject imports from Mexico have been exempt from the Section 232 tariffs since May 20, 2019.<sup>300</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>301</sup>

Cumulated subject imports, by volume, increased by \*\*\* percent between 2020 and 2022, increasing from \*\*\* short tons in 2020 to \*\*\* short tons in 2021 and \*\*\* short tons in

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<sup>294</sup> CR/PR at IV-1 n.2. Subject merchandise from China in these investigations includes certain products that are excluded from the scope of the China orders. *See Petitioners’ Response to First Supplemental Scope Questions Regarding Common Issues and Injury Petition Volume I of the Petition*, (Oct. 13, 2023) at 2-4.

<sup>295</sup> 19 U.S.C. § 2411.

<sup>296</sup> CR/PR at I-14-I-15.

<sup>297</sup> CR/PR at I-14-I-15.

<sup>298</sup> CR/PR at I-15.

<sup>299</sup> CR/PR at I-15. The TRQ level for aluminum products originating in Italy is 9000 kg (9.92 short tons) per year and covers aluminum extrusions and out-of-scope products. *Id.*

<sup>300</sup> CR/PR at I-15.

<sup>301</sup> 19 U.S.C. § 1677(7)(C)(i).

2022; cumulated subject imports were \*\*\* short tons in interim 2023, compared with \*\*\* short tons in interim 2022.<sup>302</sup>

Cumulated subject imports increased as a share of apparent U.S. consumption by \*\*\* percentage points between 2020 and 2022, from \*\*\* percent of apparent U.S. consumption in 2020 to \*\*\* percent in 2021 and \*\*\* percent in 2022.<sup>303</sup> Cumulated subject imports' market share was \*\*\* percent in interim 2023, compared with \*\*\* percent in interim 2022.<sup>304</sup>

Based on the record in the preliminary phase of these investigations, we find that the volume of cumulated subject imports and the increase in that volume are significant in absolute terms and relative to consumption 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 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>305</sup>

As discussed in section VII.B.3 above, we find that there is a moderate-to-high degree of substitutability between cumulated subject imports and the domestic like product, and that price is an important factor in purchasing decisions for aluminum extrusions.

The Commission collected quarterly quantity and f.o.b. pricing data on sales of four types of aluminum extrusions shipped to unrelated U.S. customers during the POI.<sup>306</sup> Thirteen

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<sup>302</sup> CR/PR at Tables IV-2, C-1 (not including the Dominican Republic).

<sup>303</sup> CR/PR at Tables IV-13, C-1 (not including the Dominican Republic).

<sup>304</sup> CR/PR at Tables IV-13, C-1. 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, compared with \*\*\* percent in interim 2022. CR/PR at Table IV-2.

<sup>305</sup> 19 U.S.C. § 1677(7)(C)(ii).

<sup>306</sup> CR/PR at V-6. The four pricing products are:

**Product 1.**-- Mullions and Split-Mullions, Anodized Finish, Unworked, Alloy in the 6000 series – Size: 1.75" x 3" to 3" x 8", Weight: 0.6lb/ft to 7lb/ft.;

(Continued...)

U.S. producers and 12 importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.<sup>307</sup> The pricing data reported by these firms accounted for approximately 6.2 percent of U.S. producers' U.S. commercial shipments of domestically produced aluminum extrusions and 4.9 percent of importers' U.S. commercial shipments of cumulated subject imports in 2022.<sup>308</sup>

Cumulated subject imports undersold the domestic like product in 92 of 187 quarterly comparisons, or 49.2 percent of the time, with underselling margins ranging between 0.3 percent and 72.1 percent, and averaging 23.6 percent.<sup>309</sup> They oversold the domestic like product in the remaining 95 quarterly comparisons, or 50.8 percent of the time, with overselling margins ranging between 2.0 percent and 859.9 percent and averaging 101.6 percent.<sup>310</sup> There were reported subject import sales of 50.8 million pounds in the quarters with underselling, representing 74.9 percent of total reported subject import pricing sales volume, compared to reported subject import sales of 17.0 million pounds in the quarters with overselling, representing 25.1 percent of reported total reported subject import sales volume.<sup>311</sup> The majority of subject import underselling in terms of both quarterly comparisons and reported sales volume was for pricing products 2 and 4.<sup>312</sup>

The volume of reported subject import sales in quarterly comparisons in which there was underselling was \*\*\* pounds out of \*\*\* pounds in 2020, \*\*\* pounds out of \*\*\* pounds in 2021, and \*\*\* pounds out of \*\*\* pounds in 2022.<sup>313</sup> Thus, the pricing data show that subject imports predominantly undersold the domestic product by volume in each year of the POI.

We have also considered purchasers' responses to the Commission's lost sales/lost revenue survey. Of the 20 responding purchasers, 16 purchasers reported that, since January 1, 2020, they had purchased aluminum extrusions instead of domestically produced aluminum extrusions, and 14 of these purchasers reported that the price of subject imports was lower

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**Product 2.**-- Tub and shower components, Anodized and Bright Dip Finishes, Unworked, Alloys in the 6000 series – Size: CCD: 0.6" to 3", Weight: 0.1 lb/ft to 1lb/ft.;

**Product 3.**-- Noise Vibration and Harshness (NVH) Brackets and Inner Inserts, 6061-T6, single or multi-void hollows, 7"-12" CCD, wt/ft 1-8 lbs, e-coated or uncoated, cut to length, machined, deburred;

**Product 4.**-- Window Treatments, including Vertical Blinds and Shades, Painted Finish, Alloy in the 6000 series – Size: CCD: 1.0" to 6.0", Weight: 0.20 lb/ft to 2.0 lb/ft. *Id.*

<sup>307</sup> CR/PR at V-6.

<sup>308</sup> CR/PR at Table V-5.

<sup>309</sup> CR/PR at Table V-11.

<sup>310</sup> CR/PR at Table V-11.

<sup>311</sup> CR/PR at Table V-11.

<sup>312</sup> See CR/PR at Table V-11.

<sup>313</sup> Staff Worksheet V-8, EDIS Doc. ID 809304. The volume of subject imports in underselling comparisons in interim 2023 was \*\*\* pounds out of \*\*\* pounds. *Id.*

than the price of the domestically produced product.<sup>314</sup> Five of those purchasers also reported that price was a primary reason for their decision to purchase \*\*\* pounds of aluminum extrusions imported from the subject countries rather than the domestic like product.<sup>315</sup>

Based on the moderate-to-high degree of substitutability between subject imports and the domestic like product, the importance of price in purchasing decisions, the underselling in quarters corresponding to three-quarters of reported subject import pricing product sales volume, and the responses to the lost sales/lost revenue survey, we find that cumulated subject imports undersold the domestic like product to a significant degree. The underselling resulted in subject imports gaining market share at the expense of the domestic industry during the POI. From 2020 to 2022, cumulated subject imports gained \*\*\* percentage points of market share as the domestic industry lost \*\*\* percentage points.<sup>316</sup>

We have also examined price trends during the POI. Between the first quarter of 2020 and the first quarter of 2023, U.S. producers' sales prices increased irregularly as the price for aluminum, the primary raw material for production of aluminum extrusions, increased.<sup>317</sup> Prices for the domestic product generally declined slightly in 2020 before increasing during 2021 and 2022 and then stabilizing in interim 2023.<sup>318</sup> The sales prices of domestically produced aluminum extrusions meeting the definitions of pricing products 1-4 increased by \*\*\* percent, \*\*\* percent, \*\*\* percent and \*\*\* percent, respectively, over the POI.<sup>319</sup> During the same period, subject import sales prices also increased irregularly with respect to pricing products 1-4, by \*\*\* percent, \*\*\* percent, \*\*\* percent, and \*\*\* percent, respectively.<sup>320</sup>

We have also considered whether cumulated subject imports prevented price increases for domestically produced aluminum extrusions which otherwise would have occurred to a significant degree. Notwithstanding the increase in apparent U.S. consumption of 25.7 percent from 2020 to 2022, the domestic industry's ratio of COGS to net sales rose by 1.6 percentage points between 2020 and 2022. The ratio increased from 87.0 percent in 2020 to 88.5 percent in 2021 and 2022; the ratio was lower in interim 2023, at 87.2 percent, than in interim 2022, at

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<sup>314</sup> CR/PR at V-39.

<sup>315</sup> CR/PR at Table V-14.

<sup>316</sup> CR/PR at Tables IV-13 and C-1. Between interim periods, subject imports gained a further \*\*\* percentage points of market share as the domestic industry lost \*\*\* percentage points. *Id.*

<sup>317</sup> CR/PR at Fig. V-1.

<sup>318</sup> CR/PR at Figs. V-3, V-5, V-7, and V-9.

<sup>319</sup> CR/PR at Table V-10. No purchasers reported that domestic producers lowered their prices to meet subject import prices. CR/PR at V-39.

<sup>320</sup> CR/PR at Table V-10.



87.6 percent.<sup>321</sup> As the domestic industry's unit COGS increased by 55.7 percent from 2020 to 2022, the industry's average net sales unit values increased by 53.0 percent.<sup>322</sup> At the same time, the industry's average unit net sales value increased by more in dollars per short ton than its unit COGS. From 2020 to 2022, the domestic industry's unit net sales value increased by \$2,148 per short ton while its unit COGS increased by \$1,965 per short ton.<sup>323</sup>

In sum, based on the record in the preliminary phase of these investigations, we find that cumulated subject imports significantly undersold the domestic like product, causing the domestic industry to lose sales and market share to cumulated subject imports. Therefore, we find that cumulated subject imports had significant price effects.

#### **E. Impact of the Subject Imports<sup>324</sup>**

Section 771(7)(C)(iii) of the Tariff Act provides that the Commission, in examining the impact of the subject imports on the domestic industry, "shall evaluate all relevant economic factors which have a bearing on the state of the industry." These factors include output, sales,

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<sup>321</sup> CR/PR at Tables VI-1, C-1.

<sup>322</sup> CR/PR at Tables VI-2, C-1. Most of the increase in the domestic industry's total COGS was driven by increasing raw material costs, which increased by \$1,648 per short ton from 2020-2022, from \$2,069 per short ton in 2020 to \$2,833 per short ton in 2021, and then to \$3,717 per short ton in 2022; they were \$786 per short ton lower in interim 2023 at \$3,186 per short ton, compared to \$3,972 per short ton in interim 2022. *Id.* at Tables VI-1-2.

<sup>323</sup> See CR/PR at Table VI-1. The industry's unit COGS increased from \$3,526 per short ton in 2020 to \$4,372 per short ton in 2021, and then to \$5,491 per short ton in 2022; unit COGS were \$5,036 per short ton in interim 2023, as compared with \$5,609 per short ton in interim 2022. CR/PR at Table VI-1. The industry's unit net sales values increased from \$4,054 per short ton in 2020 to \$4,941 per short ton in 2021, and then to \$6,202 per short ton in 2022; they were \$5,777 per short ton in interim 2023, as compared with \$6,404 per short ton in interim 2022. *Id.* The domestic industry's unit COGS and net sales values were \$573 per short ton and \$627 per short ton lower, respectively, in interim 2023 than in interim 2022. *Id.* However, per unit raw material costs were \$786 per short ton lower in interim 2023 than in interim 2022. *Id.*

<sup>324</sup> In its notice initiating the antidumping duty investigations, Commerce initiated investigations based on estimated dumping margins of 376.85 percent for imports from China; 165.25 percent for imports from Colombia; 42.79 to 63.21 percent for imports from Ecuador; 39.05 percent for imports from India; 88.53 percent for imports from Indonesia; 41.67 percent for imports from Italy; 43.56 percent for imports from South Korea; 25.89 to 27.51 percent for imports from Malaysia; 76.68 to 82.03 percent for imports from Mexico; 60.25 to 67.86 percent for imports from Taiwan; 76.73 percent for imports from Thailand; 48.43 percent for imports from Turkey; 42.29 percent for imports from the UAE; and 41.84 percent for imports from Vietnam. *Aluminum Extrusions From the People's Republic of China, Colombia, the Dominican Republic, Ecuador, India, Indonesia, Italy, the Republic of Korea, Malaysia, Mexico, Taiwan, Thailand, the Republic of Turkey, the United Arab Emirates, and the Socialist Republic of Vietnam: Initiation of Less-Than-Fair-Value Investigations*, 88 Fed. Reg. 74433,74421 (Oct. 31, 2023).

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 debt, research and development (“R&D”), 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>325</sup>

The domestic Industry’s condition generally improved from 2020 to 2022, and it reported increases in its trade, employment, and financial indicators. Nonetheless, the improvements were not commensurate with the 25.7 percent increase in apparent U.S. consumption during the period because increasing volumes of low-priced cumulated subject imports captured \*\*\* percentage points of market share from the industry. The domestic industry’s performance weakened by nearly every measure in interim 2023 compared to interim 2022, as cumulated subject imports captured another \*\*\* percentage points of market share from the industry and apparent U.S. consumption was 12.5 percent lower.<sup>326</sup>

The domestic industry increased its capacity from 2020 to 2022, while its production, capacity utilization, and U.S. shipments increased from 2020 to 2021 and then declined in 2022. The industry’s practical capacity increased by 5.4 percent between 2020 and 2022, increasing from 1.6 million short tons in 2020 to 1.7 million short tons in 2021 and 2022; it was higher in interim 2023, at 861,422 short tons, compared with interim 2022, at 844,057 short tons.<sup>327</sup> The domestic industry’s production quantity increased by 13.5 percent between 2020 and 2022, increasing from 1.2 million short tons in 2020 to 1.4 million short tons in 2021 and 2022; production was lower in interim 2023, at 619,459 short tons, compared with interim 2022, at 727,304 short tons.<sup>328</sup> Capacity utilization increased by 5.7 percentage points between 2020 and 2022, increasing from 74.5 percent in 2020 to 82.7 percent in 2021, before falling to 80.1 percent in 2022; capacity utilization was lower in interim 2023, at 71.9 percent, compared with interim 2022, at 86.2 percent.<sup>329</sup>

The domestic industry’s employment indicators generally improved from 2020 to 2022 but weakened in interim 2023 compared to interim 2022. The domestic industry’s number of production and related workers (“PRWs”) increased by 14.5 percent from 2020 to 2022, increasing from 13,252 in 2020 to 14,293 in 2021, and 15,168 in 2022. It was 7.2 percent lower

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<sup>325</sup> 19 U.S.C. § 1677(7)(C)(iii). This provision was amended by the Trade Preferences Extension Act (“TPEA”) of 2015, Pub. L. 114-27.

<sup>326</sup> CR/PR at Table C-1.

<sup>327</sup> CR/PR at Tables III-5, C-1.

<sup>328</sup> CR/PR at Tables III-5, C-1.

<sup>329</sup> CR/PR at Tables III-5, C-1.

in interim 2023, at 14,359 PRWs, compared with interim 2022, at 15,469 PRWs.<sup>330</sup> Hours worked increased by 13.4 percent between 2020 and 2022, increasing from 28.1 million hours in 2020 to 30.5 million hours in 2021, and 31.8 million hours in 2022; hours worked were 2.4 percent lower in interim 2023, at 20.4 million hours, compared with interim 2022, at 20.9 million hours.<sup>331</sup> Wages paid increased by 28.3 percent between 2020 and 2022, rising from \$790.7 million in 2020 to \$927.4 million in 2021, and \$1.0 billion in 2022; wages paid were 3.3 percent lower in interim 2023, at \$495.7 million, compared with interim 2022, at \$512.5 million.<sup>332</sup> Productivity (in short tons per 1,000 hours) increased slightly between 2020 and 2022, increasing from 42.6 in 2020 to 45.2 in 2021 and then decreasing to 42.7 in 2022; productivity was lower in interim 2023, at 30.3, as compared with interim 2022, at 34.7.<sup>333</sup>

The domestic industry's U.S. shipments increased by 11.5 percent from 2020 to 2022, increasing from 1.1 million short tons in 2020 to 1.3 million short tons in 2021 and 2022; U.S. shipments were lower in interim 2023, at 583,558 short tons, compared with interim 2022, at 681,375 short tons.<sup>334</sup> The domestic industry's share of apparent U.S. consumption declined overall by 6.8 percentage points between 2020 and 2022, decreasing by 3.5 percentage points from 60.2 percent in 2020 to 56.7 percent in 2021, and then declining by another 3.3 percentage points to 53.4 percent in 2022.<sup>335</sup> Its market share was also lower in interim 2023, at 53.7 percent, compared with interim 2022, at 54.9 percent.<sup>336</sup>

The domestic industry's end-of-period inventories increased by 39.3 percent between 2020 and 2022, increasing from 43,889 short tons in 2020 to 51,749 short tons in 2021, and 61,142 short tons in 2022; they were lower in interim 2023, at 56,937 short tons, than they were in interim 2022, at 60,838 short tons.<sup>337</sup> As a ratio to total shipments, the domestic industry's end-of-period inventories increased from \*\*\* percent in 2020 to \*\*\* percent in 2021 and \*\*\* percent in 2022; the ratio was higher in interim 2023, at \*\*\* percent, than in interim 2022, at \*\*\* percent.<sup>338</sup>

The domestic industry's financial performance improved from 2020 to 2022 according to most indicators but was weaker in interim 2023 compared to interim 2022. The domestic

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<sup>330</sup> CR/PR at Tables III-19, C-1.

<sup>331</sup> CR/PR at Tables III-19, C-1.

<sup>332</sup> CR/PR at Tables III-19, C-1.

<sup>333</sup> CR/PR at Tables III-19, C-1.

<sup>334</sup> CR/PR at Tables III-9, C-1.

<sup>335</sup> CR/PR at Tables IV-13, C-1.

<sup>336</sup> CR/PR at Tables IV-13, C-1.

<sup>337</sup> CR/PR at Tables III-10, C-1.

<sup>338</sup> CR/PR at Tables III-10, C-1.

industry's net sales revenues increased by 70.9 percent between 2020 and 2022, rising from \$4.9 billion in 2020 to \$6.7 billion in 2021 and \$8.3 billion in 2022; the industry's net sales revenues were lower in interim 2023, at \$3.6 billion, compared with interim 2022, at \$4.6 billion.<sup>339</sup> The domestic industry's gross profit increased by 50.5 percent between 2020 and 2022, rising from \$633.4 million in 2020 to \$774.9 million in 2021, and \$953.3 million in 2022; the industry's gross profit was lower in interim 2023, at \$457.9 million, compared with interim 2022, at \$569.1 million.<sup>340</sup> The domestic industry's operating income increased by 64.8 percent between 2020 and 2022, increasing from \$333.2 million in 2020 to \$427.0 million in 2021, and \$549.2 million in 2022; the domestic industry's operating income was lower in interim 2023, at \$253.6 million, compared with interim 2022, at \$369.1 million.<sup>341</sup> The industry's net income increased by 66.7 percent between 2020 and 2022, increasing from \$315.2 million in 2020 to \$400.0 million in 2021, and \$525.5 million in 2022. The domestic industry's net income in interim 2023 was lower, at \$232.4 million, compared with interim 2022, at \$357.0 million.<sup>342</sup> The industry's ratio of operating income to net sales decreased from 6.8 percent in 2020 to 6.3 percent in 2021, and then increased to 6.6 percent in interim 2022; it was lower in interim 2023, at 7.1 percent, compared with interim 2022, at 8.1 percent.<sup>343</sup> Its net income margin decreased from 6.5 percent in 2020 to 5.9 percent in 2021 and then increased to 6.3 percent in 2022; it was 6.5 percent in interim 2023, compared with 7.8 percent in interim 2022.<sup>344</sup> The industry's net assets increased by 38.8 percent between 2020 and 2022, rising from \$2.4 billion in 2020 to \$3.1 billion in 2021 and \$3.3 billion in 2022.<sup>345</sup> The domestic industry's return on assets declined from 14.0 percent in 2020 to 13.8 percent in 2021 and then increased to 16.6 percent in 2022.<sup>346</sup>

The domestic industry made substantial capital investments during the POI to upgrade its production facilities and maintain and expand capacity.<sup>347</sup> The industry's capital expenditures increased by 58.0 percent between 2020 and 2022, increasing from \$201.7 million in 2020 to \$305.0 million in 2021 and \$318.7 million in 2022; capital expenditures were lower in interim 2023, at \$116.1 million, compared with interim 2022, at \$141.1 million.<sup>348</sup> The

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<sup>339</sup> CR/PR at Tables VI-1, C-1.

<sup>340</sup> CR/PR at Tables VI-1, C-1.

<sup>341</sup> CR/PR at Tables VI-1, C-1.

<sup>342</sup> CR/PR at Tables VI-1, C-1.

<sup>343</sup> CR/PR at Tables VI-1, C-1.

<sup>344</sup> CR/PR at Tables VI-1, C-1.

<sup>345</sup> CR/PR at Tables VI-8, C-1.

<sup>346</sup> CR/PR at Table VI-9.

<sup>347</sup> CR/PR at Tables VI-4 and VI-5.

<sup>348</sup> CR/PR at Tables VI-4, C-1.

domestic industry's R&D expenses increased by \*\*\* percent between 2020 and 2022, decreasing from \$\*\*\* in 2020 to \$\*\*\* in 2021 and then increasing to \$\*\*\* in 2022; the industry's R&D expenses were lower in interim 2023, at \$\*\*\*, compared with interim 2022, at \$\*\*\*.<sup>349</sup>

The record of the preliminary phase of these investigations indicates that the increase in subject imports prevented the domestic industry from fully benefitting from the increase in apparent U.S. consumption as the economy recovered from the COVID-19 pandemic during the 2020-2022 period. The domestic industry lost market share to subject imports, and subject imports then exacerbated the effects of lower demand in interim 2023 compared to interim 2022. Cumulated subject import volume increased significantly during the POI, driven by significant underselling, capturing \*\*\* percentage points of market share from the domestic industry from 2020 to 2022 and \*\*\* percentage points of market share from the industry in interim 2023 compared to interim 2022. As cumulated subject import volume increased \*\*\* percent from 2020 to 2022, the increase in the domestic industry's U.S. shipments, at 11.5 percent, was far less than the 25.7 percent increase in apparent U.S. consumption, even though the industry possessed ample unused practical capacity and increasing inventories with which it could have increased U.S. shipments.<sup>350</sup> As cumulated subject imports captured \*\*\* percentage points of market share from the domestic industry from 2021 to 2022, the industry's production, U.S. shipments, capacity utilization, and net sales declined, notwithstanding a 4.9 percent increase in apparent U.S. consumption.<sup>351</sup> Moreover, the domestic industry was unable to fully benefit from capital investments totaling \$825.4 million during the 2020-2022 period and the concomitant increase in the industry's production capacity, as it lost market share to cumulated subject imports.<sup>352</sup>

In interim 2023, when apparent U.S. consumption was 12.5 percent lower than in interim 2022, the domestic industry's performance deteriorated by nearly all measures as the industry continued to lose market share to cumulated subject imports. The industry's production, U.S. shipments, and sales all declined by more in percentage terms than apparent

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<sup>349</sup> CR/PR at Tables VI-6, C-1.

<sup>350</sup> CR/PR at Tables III-5, III-10 and C-1.

<sup>351</sup> CR/PR at Tables III-5 and C-1.

<sup>352</sup> CR/PR at Tables VI-4 and C-1. The majority of reporting U.S. producers reported negative effects on their investments as a result of subject imports. Sixteen U.S. producers reported that the return on their investments was negatively impacted, three reported a reduction in the size of their capital investments, and 13 reported the cancellation, postponement or rejection of expansion projects. CR/PR at Tables VI-11 and VI-12.

U.S. consumption in interim 2023 compared to interim 2022.<sup>353</sup> Because the domestic industry's performance was weaker during the POI than it would have been had the industry not lost sales and market share to cumulated subject imports, we find that cumulated subject imports had a significant impact on the domestic industry.

Respondents contend that cumulated subject imports increased during the POI because the domestic industry was incapable of satisfying the growing U.S. demand for aluminum extrusions.<sup>354</sup> The record does not support respondents' argument. The domestic industry reported substantial unused practical capacity and many responding domestic producers operated at low rates of capacity utilization throughout the POI.<sup>355</sup> Given this, and the 39.3 percent increase in the domestic industry's end-of-period inventories from 2020 to 2022, the industry could have increased its U.S. shipments had it not lost market share to cumulated subject imports during the period.

We have also considered whether there are other factors that may have had an impact on the domestic industry to ensure that we are not attributing injury from such other factors to subject imports. Between 2020 and 2022, nonsubject imports lost market share to cumulated subject imports as they increased by less than the increase in apparent U.S. consumption, unlike cumulated subject imports, although nonsubject imports did increase market share at the expense of the domestic industry between interim periods along with subject imports.<sup>356</sup> Consequently, nonsubject imports cannot explain the injury we have attributed to subject imports.

Trends in demand also do not explain the domestic industry's loss of market share to cumulated subject imports or the industry's inability to fully capitalize on the increase in apparent U.S. consumption from 2020 to 2022. The domestic industry lost market share as apparent U.S. increased from 2020 to 2022, and its market share was lower in interim 2023 than in interim 2022, when apparent U.S. consumption was lower. We intend to further investigate any alternative causes of injury and the effects of the COVID-19 pandemic and subsequent recovery on the domestic industry in any final phase of the investigations.

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<sup>353</sup> CR/PR at Table C-1.

<sup>354</sup> RVIA's Comments at 6, 13; Mexican Coalition's Postconference Brief at 12-14; Press Metal's Postconference Brief at 1-2.

<sup>355</sup> See CR/PR at Tables III-7 and C-1. Several responding domestic producers attributed their reduced production and sales to subject imports rather than production constraints. See *id.* at Table at III-6.

<sup>356</sup> CR/PR at Table C-1.

## VIII. Reasonable Indication of Threat of Material Injury by Reason of Allegedly Subsidized Subject Imports from Turkey

We have determined that subject imports from Turkey would imminently account for more than 3 percent of all subject merchandise imported into the United States. Therefore, we need to determine whether there is a reasonable indication that the domestic industry is threatened with material injury by reason of subject imports from Turkey that are allegedly subsidized.

### A. Legal Standard

Section 771(7)(F) of the Tariff Act directs the Commission to determine whether there is a reasonable indication that the U.S. industry is threatened with material injury by reason of subject imports by analyzing 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.”<sup>357</sup> The Commission may not make such a determination “on the basis of mere conjecture or supposition,” and considers the threat factors “as a whole” in making its determination whether dumped or subsidized imports are imminent and whether material injury by reason of subject imports would occur unless an order is issued.<sup>358</sup> In making our determinations, we consider all statutory threat factors that are relevant to these investigations.<sup>359</sup>

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<sup>357</sup> 19 U.S.C. § 1677(7)(F)(ii).

<sup>358</sup> 19 U.S.C. § 1677(7)(F)(ii).

<sup>359</sup> These factors are as follows:

(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,

(Continued...)

## B. Cumulation for Threat

We must consider whether to cumulate allegedly subsidized subject imports from Turkey with those from other sources eligible for cumulation. In contrast to cumulation for material injury, cumulation for a threat analysis is discretionary. Under Section 771(7)(H) of the Tariff Act, the Commission may “to the extent practicable” cumulatively assess the volume and price effects of subject imports from all countries as to which petitions were filed on the same day if the requirements for cumulation in the material injury context are satisfied.<sup>360</sup>

While imports from the Dominican Republic are ineligible for cumulation because the antidumping investigation with respect to these imports has been terminated, imports from all other sources subject to investigation remain eligible for cumulation with allegedly subsidized subject imports from Turkey for purposes of our threat analysis.<sup>361</sup> Thus, subject imports from China, Colombia, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, South Korea, Taiwan, Thailand, the UAE, and Vietnam are eligible for cumulation with allegedly subsidized subject imports from Turkey for purposes of our threat of material injury analysis.<sup>362</sup>

Petitioners contend that the Commission should cumulate all subject imports for purposes of a threat analysis because there is likely to be a reasonable overlap of competition between and among subject imports from each source and the domestic like product.<sup>363</sup>

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(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,

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(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).

19 U.S.C. § 1677(7)(F)(i). To organize our analysis, we discuss the applicable statutory threat factors using the same volume/price/impact framework that applies to our material injury analysis. Statutory threat factors (I), (II), (III), (V), and (VI) are discussed in the analysis of subject import volume. Statutory threat factor (IV) is discussed in the analysis of subject import price effects. Statutory factors (VIII) and (IX) are discussed in the analysis of impact. Statutory factor (VII) concerning agricultural products is inapplicable to these investigations.

<sup>360</sup> 19 U.S.C. § 1677(7)(H).

<sup>361</sup> See 19 U.S.C. § 1677(7)(G)(ii), (7)(H); see generally *Oil Country Tubular Goods from India, Korea, the Philippines, Taiwan, Turkey, Ukraine, and Vietnam*, Inv. Nos. 701-TA-499-500, 731-TA-1215-1217, 1219-1123 (Final), USITC Pub. 4489 (Sept. 2014) at 50.

<sup>362</sup> See 19 U.S.C. § 1677(7)(H); see generally *Cold-Rolled Steel Flat Products from Brazil, India, Korea, Russia, and the United Kingdom*, Inv. Nos. 701-TA-540, 542-544 and 731-TA-1283, 1285, 1287, and 1289-1290 (Final), USITC Pub. 4637 (Sept. 2016) at 24.

<sup>363</sup> Petitioners’ Postconference Brief at 35.



The Mexican Coalition argues that the Commission should exercise its discretion to not cumulate subject imports from Mexico for purposes of any threat analysis because the industry in Mexico is focused primarily on its home market, and for more than a decade, Mexico has imported more aluminum extrusions from the United States than it has exported to the United States.<sup>364</sup>

Delta Aluminum argues that the Commission should exercise its discretion to not cumulate subject imports from Thailand because their volumes are so small that they would likely compete under different conditions of competition than other subject imports.<sup>365</sup> East Asia Aluminum urges the Commission to exercise its discretion to not cumulate subject imports from Vietnam because “there are a variety of issues with respect to fungibility and the actual level of competition between aluminum extrusions from the various sources.”<sup>366</sup>

We previously found in Section VI.B. that the petitions for all investigations were filed on the same day and that there is a reasonable overlap of competition between subject imports from the 14 eligible subject countries, including allegedly dumped imports from Turkey, and between subject imports from each source and the domestic like product.<sup>367</sup>

There is no information on the record to suggest that the reasonable overlap of competition between and among subject imports, including allegedly subsidized imports from Turkey, and the domestic like product that now exists will not continue into the imminent future. We recognize the potential for some differences in the likely conditions of competition among subject imports from the 14 countries but find that they are not significant enough to warrant exercising our discretion to not cumulate subject imports from any source.<sup>368</sup> Indeed, the quantity of subject imports from each subject country increased from 2020 to 2022, suggesting that the conditions of competition facing subject imports from each source are largely similar.<sup>369</sup> No party has argued in this preliminary investigation that we should use our discretion not to cumulate subject imports from Turkey or advanced any reason to do so. We therefore exercise our discretion to cumulate all eligible subject imports for purposes of our threat analysis.

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<sup>364</sup> Mexican Coalition’s Postconference Brief at 18.

<sup>365</sup> Delta Aluminum’s Postconference Brief at 5.

<sup>366</sup> East Asia Aluminum’s Postconference Brief at 4.

<sup>367</sup> As explained above, this analysis included allegedly dumped imports from Turkey (which are identical to the allegedly subsidized imports from Turkey), as well as subject imports from the other eligible 13 countries.

<sup>368</sup> While the Mexican Coalition argues that Mexico is focused on its home market, the record indicates that other subject countries also shipped a majority of their shipments to their home markets. See CR/PR at Table VII-7.

<sup>369</sup> See CR/PR at Table IV-2.

## C. Analysis of Threat of Material Injury Factors

### 1. Likely Volume

We found in Section VII.C. above that the volume of cumulated subject imports and the increase in that volume was significant in absolute terms and relative to consumption during the POI. Cumulated subject import volume increased by \*\*\* percent from 2020 to 2022, and gained \*\*\* percentage points of market share over the period.<sup>370</sup> Furthermore, despite the lower cumulated subject import volume in interim 2023 of \*\*\* short tons compared to \*\*\* short tons in interim 2022, cumulated subject import market share was higher in interim 2023, at \*\*\* percent, than in interim 2022, at \*\*\* percent, and was elevated relative to earlier in the POI.<sup>371</sup>

The record indicates that cumulated subject imports are likely to maintain a significant presence in the U.S. market and substantially increase relative to apparent U.S. consumption in the imminent future in the absence of relief. Cumulated subject producers increased their capacity and production during the POI and possessed substantial excess capacity in 2022. During the 2020-2022 period, responding foreign producers in the 14 subject countries increased their production capacity by \*\*\* short tons, from \*\*\* short tons in 2020 to \*\*\* short tons in 2022, and their production by \*\*\* short tons, from \*\*\* short tons in 2020 to \*\*\* short tons in 2022.<sup>372</sup> Subject producers' capacity was \*\*\* short tons and production was \*\*\* short tons in interim 2023, down from capacity of \*\*\* short tons and production of \*\*\* short tons in interim 2022.<sup>373</sup> Their cumulated excess capacity amounted to \*\*\* short tons in 2022, equivalent to \*\*\* percent of total apparent U.S. consumption that year.<sup>374</sup>

Cumulated subject producers also possessed large and increasing end-of-period inventories with which they could increase their exports to the U.S. market. End-of-period inventories held by the subject producers increased from \*\*\* short tons in 2020 to \*\*\* short tons in 2022, equivalent to \*\*\* percent of apparent U.S. consumption that year and were \*\*\* short tons in interim 2023 compared to \*\*\* short tons in interim 2022.<sup>375</sup>

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<sup>370</sup> CR/PR at Table C-1

<sup>371</sup> CR/PR at Tables IV-2, IV-13, and C-1

<sup>372</sup> Staff Worksheet VII-1, EDIS Doc. ID 809075.

<sup>373</sup> Staff Worksheet VII-1, EDIS Doc. ID 809075.

<sup>374</sup> Derived from CR/PR at Table IV-13 and Staff Worksheet VII-1, EDIS Doc. ID 809075.

<sup>375</sup> Staff Worksheet VII-2, EDIS Doc. ID 809075. U.S. importers' end-of-period inventories of subject merchandise increased from \*\*\* short tons in 2020 to \*\*\* short tons in 2022; they were lower in interim 2023 at \*\*\* short tons than in interim 2022, at \*\*\* short tons. CR/PR at Table VII-11. U.S. (Continued...)

Cumulated subject producers were also increasingly export oriented during the POI. The subject producers' total export shipments increased from \*\*\* short tons in 2020, accounting for \*\*\* percent of their total shipments, to \*\*\* short tons in 2022, accounting for \*\*\* percent of their total shipments.<sup>376</sup> Subject producers also increased their exports to the United States as a share of their total shipments, from \*\*\* percent in 2020 to \*\*\* percent in 2022; their share was \*\*\* percent in interim 2023 compared to \*\*\* percent in interim 2022.<sup>377</sup> Additionally, Australia, Canada, the European Union, and the United Kingdom have trade measures in place on aluminum extrusions from China, the largest global exporter of aluminum extrusions, and Australia has an antidumping duty order on aluminum extrusions from Malaysia, which make the U.S. market relatively more attractive.<sup>378</sup>

In light of significant and increasing volume and market share of cumulated subject imports during the POI, the large and increasing capacity of the subject industries, including substantial excess capacity, the subject industries' large inventories, and the subject industries' demonstrated ability to supply export markets generally and the United States in particular, we find that in the absence of relief, cumulated subject imports are likely to remain significant and substantially increase relative to apparent U.S. consumption, as occurred during the POI, in the imminent future.

## 2. Likely Price Effects

As discussed in Section VII.B.3 above, we have found a moderate-to-high degree of substitutability between domestically produced aluminum extrusions and subject imports when made to the same specifications, and that price is an important consideration in purchasing decisions.

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importers reported \*\*\* short tons of arranged imports from subject sources for July 2023 to June 2024. CR/PR at Table VII-12. Two foreign producers reported the ability to shift production from other products to aluminum extrusions. CR/PR at II-10.

<sup>376</sup> Staff Worksheet VII-2, EDIS Doc. ID 809075. Exports as a share of total shipments was lower in interim 2023 at \*\*\* percent than in interim 2022 at \*\*\* percent. *Id.*

<sup>377</sup> Staff Worksheet VII-2, EDIS Doc. ID 809075.

<sup>378</sup> CR/PR at VII-40 and VII-41. In January 2020, Canada continued antidumping and countervailing duty orders on certain aluminum extrusions from China that were initially imposed in 2009. In March 2021, the EU set antidumping duties between 21.2 percent and 32.1 percent on aluminum extrusions from China. In December 2022, the United Kingdom set antidumping duties up to 35.1 percent on aluminum extrusions from China. In October 2022, Australia continued antidumping and countervailing duty orders on aluminum extrusions from China that were initially imposed in 2010. CR/PR at VII-40.

As discussed in Section VII.D above, we have found that subject imports undersold the domestic like product to a significant degree, during the POI.<sup>379</sup> The pricing data show underselling by subject imports in 49.5 percent of quarterly comparisons corresponding to 74.9 percent of the reported subject import sales volume in the Commission’s pricing data.<sup>380</sup> There were 50.8 million pounds of subject aluminum extrusions (74.9 percent by volume) in the quarters with underselling compared to 17.0 million pounds of subject aluminum extrusions (25.1 percent by volume) in the quarters with overselling.<sup>381</sup>

Given the moderate-to-high degree of substitutability between domestic and subject aluminum extrusions and the importance of price to purchasing decisions, the significant and increasing volumes of cumulated subject imports that are likely to enter the U.S. market in the imminent future absent relief will likely continue to undersell the domestic like product to a significant degree, as a means of gaining sales and market share. The likely low prices of the cumulated subject imports, in turn, are likely to increase demand for cumulated subject imports, causing an additional shift in market share from the domestic industry to cumulated subject imports. Accordingly, we find that significant subject import underselling is likely to continue in the imminent future, likely increasing demand for further imports and having significant price effects.

### **3. Likely Impact<sup>382</sup>**

We found in Section VII.E. above that the significant and increasing volume of low-priced cumulated subject imports had a significant impact on the domestic industry during the POI. In our threat analysis, we have found that cumulated subject imports are likely to continue to enter the U.S. market in significant volumes and to engage in significant underselling of the domestic like product in the imminent future. We conclude that cumulated subject imports will likely have the same type of adverse impact on the domestic industry in the imminent future that they did during the POI. The significant volumes of low-priced subject imports will likely

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<sup>379</sup> CR/PR at Table V-11.

<sup>380</sup> CR/PR at Table V-11.

<sup>381</sup> CR/PR at Table V-11.

<sup>382</sup> Commerce has initiated countervailing duty investigations on 32 alleged subsidy programs in China, seven alleged subsidy programs in Indonesia, 13 alleged subsidy programs in Mexico, and 44 alleged subsidy programs in Turkey. *Department of Commerce Countervailing Duty Investigation Initiation Checklist, Aluminum Extrusions from China*, Oct. 24, 2023, at 6-24; *Department of Commerce Countervailing Duty Investigation Initiation Checklist, Aluminum Extrusions from Indonesia*, Oct. 24, 2023, at 6-10; *Department of Commerce Countervailing Duty Investigation Initiation Checklist, Aluminum Extrusions from Mexico*, Oct. 24, 2023, at 5-14; *Department of Commerce Countervailing Duty Investigation Initiation Checklist, Aluminum Extrusions from Turkey*, Oct. 24, 2023, at 6-23.

continue to displace sales of the domestic like product from the U.S. market and cause the domestic industry to lose market share, which will lead to adverse effects on the domestic industry's production, U.S. shipments, revenues, and financial performance.

In Section VII.E above, we considered other factors, including demand and nonsubject imports, and concluded that any injury that may be attributable to these factors is distinct from the injury attributable to cumulated subject imports. This analysis is equally pertinent to likely conditions in the imminent future. We therefore find that further subject imports are imminent and that material injury by reason of cumulated subject imports would occur unless antidumping and countervailing duty orders are issued. Accordingly, we find a reasonable indication that the domestic industry is threatened with material injury by reason of imports of aluminum extrusions from Turkey subject to the countervailing duty investigation.

## **IX. Conclusion**

For the reasons stated above, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of aluminum extrusions from China, Colombia, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, South Korea, Taiwan, Thailand, Turkey, the UAE, and Vietnam that are allegedly sold in the United States at less than fair value and imports of aluminum extrusions from China, Indonesia, and Mexico that are allegedly subsidized by the governments of China, Indonesia, and Mexico. We also find that there is a reasonable indication that an industry in the United States is threatened with material injury by reason of imports of aluminum extrusions from Turkey that are allegedly subsidized by the government of Turkey. We further determine that imports of aluminum extrusions from the Dominican Republic that are allegedly sold in the United States at less than fair value are negligible and terminate that investigation.



# 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 U.S. Aluminum Extruders Coalition (“Coalition”)<sup>1</sup> and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, Pittsburgh, Pennsylvania (“USW”), on October 4, 2023, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized imports of aluminum extrusions<sup>2</sup> from China, Indonesia, Mexico, and Turkey and less-than-fair-value (“LTFV”) imports of aluminum extrusions from China, Colombia, Dominican Republic, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, South Korea, Taiwan, Thailand, Turkey, United Arab Emirates and Vietnam. Table I-1 presents information relating to the background of these investigations.<sup>3 4</sup>

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<sup>1</sup> The coalition consists of Alexandria Extrusion Company, Alexandria, Minnesota; APEL Extrusions Inc., Coburg, Oregon; Bonnell Aluminum, Newnan, Georgia; Brazeway, Adrian, Michigan; Custom Aluminum Products, South Elgin, Illinois; Extrudex Aluminum, North Jackson, Ohio; International Extrusions, Garden City, Michigan; Jordan Aluminum Company, Memphis, Tennessee; M-D Building Products, Oklahoma City, Oklahoma; Merit Aluminum, Corona, California; MI Metals, Oldsmar, Florida; Pennex Aluminum, Wellsville, Pennsylvania; Tower Extrusions, Olney, Texas; and Western Extrusions, Carrollton, Texas.

<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> A list of witnesses appearing at the conference is presented in appendix B of this report.

**Table I-1**

**Aluminum extrusions: Information relating to the background and schedule of this proceeding**

<b>Effective date</b>	<b>Action</b>
October 4, 2023	Petitions filed with Commerce and the Commission; institution of the Commission investigations (88 FR 71020, October 13, 2023)
October 24, 2023	Commerce's notices of initiation (Countervailing Duty: 88 FR 74433, October 31, 2023; Antidumping duty: 88 FR 74421, October 31, 2023)
October 25, 2023	Commission's conference
November 17, 2023	Commission's vote
November 20, 2023	Commission's determinations
November 28, 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*

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



*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.*

## **Organization of report**

Part I of this report presents information on the subject merchandise, alleged 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.

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

## Market summary

Aluminum extrusions are shapes and forms produced via an extrusion process of certain aluminum alloys. They are used in a wide variety of finished goods applications, including for building and construction (e.g., windows, doors, high-rise curtainwall), transportation (e.g., automotive, mass transit, aircraft) and engineered products (e.g., appliances, furniture, robotics). The leading U.S. producers of aluminum extrusions are Hydro Extrusion USA LLC (“Hydro Extrusion”), Bonnell Aluminum Inc. (“Bonnell”), and Tower Extrusions LLC (“Tower Extrusions”), while leading producers of aluminum extrusions outside the United States include \*\*\*. The leading U.S. importers of aluminum extrusions from subject sources are Home Depot, Fox Factory, and Aluminio de Baja California (“ABC Aluminum”), while the leading importers of aluminum extrusions from nonsubject countries (including \*\*\*) include Constellium, Hydro Extrusion, and Sinobec. U.S. purchasers of aluminum extrusions sell aluminum extrusions as retailers, distribute aluminum extrusions, or use aluminum extrusions to make a wide variety of downstream products. Leading purchasers include \*\*\*.

Apparent U.S. consumption of aluminum extrusions totaled approximately 2.4 million short tons (\$14.9 billion) in 2022. Currently, at least 29 firms are known to produce aluminum extrusions in the United States. U.S. producers’ U.S. shipments of aluminum extrusions totaled 1.3 million short tons (\$8.0 billion) in 2022, and accounted for 53.4 percent of apparent U.S. consumption by quantity and 53.6 percent by value. U.S. imports from subject sources totaled 866,638 short tons (\$4.9 billion) in 2022 and accounted for 36.2 percent of apparent U.S. consumption by quantity and 33.0 percent by value. U.S. imports from nonsubject sources totaled 247,598 short tons (\$2.0 billion) in 2022 and accounted for 10.3 percent of apparent U.S. consumption by quantity and 13.3 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 29 firms that staff believe accounted for the majority of U.S. production of aluminum extrusions during

2022.<sup>7</sup> U.S. imports are based on U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080, as adjusted.<sup>8</sup>

## Previous and related investigations

Aluminum extrusions have been the subject of one prior countervailing/antidumping duty investigation in the United States.<sup>9</sup> On March 31, 2020, petitions were filed with Commerce and the Commission by the Aluminum Extrusions Fair Trade Committee<sup>10</sup> and the USW alleging that an industry in the United States was materially injured and threatened with material injury by reason of LTFV and subsidized imports of aluminum extrusions from China. On April 4, 2011, Commerce determined that imports of aluminum extrusions from China were being sold at LTFV and subsidized by the Government of China. The Commission determined on May 13, 2011, that the domestic industry was materially injured by reason of LTFV and

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<sup>7</sup> The petitioners used shipments as a proxy for production in discussing industry support for the petition. Petition, pp. 2-6. Petitioners estimate that total U.S. shipments of aluminum extrusions in 2022 was 1,900,303 short tons. Petition, p. 6. U.S. producers' U.S. shipment data totaled 1,278,489 short tons in 2022, or 67.3 percent of petitioners' total U.S. shipments figure.

<sup>8</sup> These are the "primary" HTS numbers identified in the scope as numbers under which the subject merchandise is provided for. Adjustments to certain tables in this report may include using data submitted in response to Commission questionnaires to: report subject vs. nonsubject data for China; to add in reported in-scope imports under other HTS statistical reporting numbers; and to remove products other than aluminum extrusions (i.e., out-of-scope merchandise). Additionally, certain data compiled from proprietary Census-edited, Customs records using the same statistical reporting numbers listed above was used in certain tables to remove imports reported by firms that certified "no" they do not import aluminum extrusions. For detailed information on the adjustments for each table, see specific table source notes.

<sup>9</sup> Unless otherwise indicated, information in this section is based on information contained in Aluminum Extrusions from China (Second Review), Inv. Nos 701-TA-475 and 731-TA-1177, USITC Publication 5375, October 2022, pp. I-3– I-4.

<sup>10</sup> The original members of the Committee included: Aerolite Extrusion Company; Alexandria Extrusion Company; Benada Aluminum of Florida, Inc.; William L. Bonnell Company, Inc.; Frontier Aluminum Corporation; Futura Industries Corporation; Hydro Aluminum North America, Inc.; Kaiser Aluminum Corporation; Profile Extrusion Company; Sapa Extrusions, Inc.; and Western Extrusions Corporation.

subsidized imports of aluminum extrusions other than finished heat sinks from China.<sup>11</sup> On May 26, 2011, Commerce issued its antidumping and countervailing duty orders with the final weighted-average dumping margins ranging from 32.79 to 33.28 percent and net subsidy rates ranging from 8.02 to 374.15 percent.

On July 5, 2016, the Commission determined that it would conduct full reviews of the antidumping and countervailing duty orders on aluminum extrusions from China. On August 5, 2016, Commerce determined that revocation of the antidumping and countervailing duty orders on aluminum extrusions from China would be likely to lead to continuation or recurrence of dumping and subsidization. On March 27, 2017, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time. Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective April 25, 2017, Commerce issued a continuation of the antidumping and countervailing duty orders on imports of aluminum extrusions from China.

On June 6, 2022, the Commission determined that it would conduct expedited reviews of the antidumping and countervailing duty orders on aluminum extrusions from China. On July 7, 2022, Commerce determined that revocation of the antidumping and countervailing duty orders on aluminum extrusions from China would be likely to lead to continuation or recurrence of dumping and subsidization.<sup>12</sup> On October 17, 2022, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.<sup>13</sup> Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective November 2, 2022, Commerce issued a continuation of the antidumping and countervailing duty orders on imports of aluminum extrusions from China.<sup>14</sup>

In its Issues and Decision Memoranda accompanying the results of its most recent reviews, Commerce noted that there have been over 125 scope rulings since the imposition of the orders.<sup>15</sup>

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<sup>11</sup> The Commission further determined that an industry in the United States was not materially injured or threatened with material injury, or that the establishment of an industry in the United States was not materially retarded, by reason of imports of finished heat sinks from China. 76 FR 29007, May 19, 2011.

<sup>12</sup> 87 FR 40501, July 7, 2022; 87 FR 40509, July 7, 2022.

<sup>13</sup> 87 FR 64113, October 21, 2022.

<sup>14</sup> 87 FR 66128, November 2, 2022.

<sup>15</sup> See “Issues and Decision Memorandum for the Final Results of the Expedited Second Sunset Review of the Antidumping Duty Order on Aluminum Extrusions from the People’s Republic of China”, June 29, 2022, and “Issues and Decision Memorandum for the Final Results of the 2022 Expedited

(continued...)

## **Nature and extent of alleged subsidies and sales at LTFV**

### **Alleged subsidies**

On October 31, 2023, Commerce published a notice in the Federal Register of the initiation of its countervailing duty investigations on aluminum extrusions from China, Indonesia, Mexico, and Turkey.<sup>16</sup>

### **Alleged sales at LTFV**

On October 31, 2023, Commerce published a notice in the Federal Register of the initiation of its antidumping duty investigations on aluminum extrusions from China, Colombia, Dominican Republic, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, South Korea, Taiwan, Thailand, Turkey, United Arab Emirates and Vietnam.<sup>17</sup> Commerce has initiated antidumping duty investigations based on estimated dumping margins of 376.85 percent for aluminum extrusions from China; 165.25 percent for aluminum extrusions from Colombia; 28.29 percent for aluminum extrusions from Dominican Republic; 42.79 to 63.21 percent for aluminum extrusions from Ecuador; 39.05 percent for aluminum extrusions from India; 88.53 percent for aluminum extrusions from Indonesia; 41.67 percent for aluminum extrusions from Italy; 43.56 percent for aluminum extrusions from South Korea; 25.89 to 27.51 percent for aluminum extrusions from Malaysia; 76.68 to 82.03 percent for aluminum extrusions from Mexico; 60.25 to 67.86 percent for aluminum extrusions from Taiwan; 76.73 percent for aluminum extrusions from Thailand; 48.43 percent for aluminum extrusions from Turkey; 42.29 percent for aluminum extrusions from United Arab Emirates; and 41.84 percent for aluminum extrusions from Vietnam.

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Sunset Review of the Countervailing Duty Order on Aluminum Extrusions from the People's Republic of China", June 29, 2022.

<sup>16</sup> For further information on the alleged subsidy programs see Commerce's notice of initiation and related CVD Initiation Checklist. 88 FR 74433, October 31, 2023.

<sup>17</sup> 88 FR 74421, October 31, 2023.

## The subject merchandise

### Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:<sup>18</sup>

*The merchandise subject to these investigations are aluminum extrusions, regardless of form, finishing, or fabrication, whether assembled with other parts or unassembled, whether coated, painted, anodized, or thermally improved. Aluminum extrusions are shapes and forms, produced by an extrusion process, made from aluminum alloys having metallic elements corresponding to the alloy series designations published by the Aluminum Association commencing with the numbers 1, 3, and 6 (or proprietary equivalents or other certifying body equivalents). Specifically, subject aluminum extrusions made from an aluminum alloy with an Aluminum Association series designation commencing with the number 1 contain not less than 99 percent aluminum by weight. Subject aluminum extrusions made from an aluminum alloy with an Aluminum Association series designation commencing with the number 3 contain manganese as the major alloying element, with manganese accounting for not more than 3.0 percent of total materials by weight. Subject aluminum extrusions made from an aluminum alloy with an Aluminum Association series designation commencing with the number 6 contain magnesium and silicon as the major alloying elements, with magnesium accounting for at least 0.1 percent but not more than 2.0 percent of total materials by weight, and silicon accounting for at least 0.1 percent but not more than 3.0 percent of total materials by weight. The scope also includes merchandise made from an aluminum alloy with an Aluminum Association series designation commencing with the number 5 (or proprietary equivalents or other certifying body equivalents) that have a magnesium content accounting for up to but not more than 2.0 percent of total materials by weight.*

*The country of origin of the aluminum extrusion is determined by where the metal is extruded (i.e., pressed through a die).*

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<sup>18</sup> 88 FR 74421, October 31, 2023; 88 FR 74433, October 31, 2023. Commerce further stated in its notices of initiation that, "We have some concerns related to the administrability of certain provisions in the proposed scope. For example, we find the definition of subassemblies (included) and imported merchandise that is not a part or subassembly of a larger product or system (excluded) remains an outstanding issue. Accordingly, Commerce intends to continue evaluating the scope of these investigations, with the possibility of making additional modifications to clarify further what products are covered and not covered by the scope of these investigations."

*Aluminum extrusions are produced and imported in a wide variety of shapes and forms, including, but not limited to, hollow profiles, other solid profiles, pipes, tubes, bars, and rods. Aluminum extrusions that are drawn subsequent to extrusion (drawn aluminum) are also included in the scope.*

*Subject aluminum extrusions are produced and imported with a variety of coatings and surface treatments, and types of fabrication. The types of coatings and treatments applied to aluminum extrusions include, but are not limited to, extrusions that are mill finished (i.e., without any coating or further finishing), brushed, buffed, polished, anodized (including brightdip), liquid painted, electroplated, chromate converted, powder coated, sublimated, wrapped, and/or bead blasted. Subject aluminum extrusions may also be fabricated, i.e., prepared for assembly, or thermally improved. Such operations would include, but are not limited to, extrusions that are cut-to-length, machined, drilled, punched, notched, bent, stretched, stretch-formed, hydroformed, knurled, swedged, mitered, chamfered, threaded, and spun. Performing such operations in third countries does not otherwise remove the merchandise from the scope of the investigations.*

*The types of products that meet the definition of subject merchandise include but are not limited to, vehicle roof rails and sun/moon roof framing, solar panel racking rails and framing, tradeshow display fixtures and framing, parts for tents or clear span structures, fence posts, drapery rails or rods, electrical conduits, door thresholds, flooring trim, electric vehicle battery trays, heat sinks, signage or advertising poles, picture frames, telescoping poles, or cleaning system components. Aluminum extrusions may be heat sinks, which are fabricated aluminum extrusions that dissipate heat away from a heat source and may serve other functions, such as structural functions. Heat sinks come in a variety of sizes and shapes, including but not limited to a flat electronic heat sink, which is a solid aluminum extrusion with at least one flat side used to mount electronic or mechanical devices; a heat sink that is a housing for electronic controls or motors; lighting heat sinks, which dissipate heat away from LED devices; and process and exchange heat sinks, which are tube extrusions with fins or plates used to hold radiator tubing. Heat sinks are included in the scope, regardless of whether the design and production of the heat sinks are organized around meeting specified thermal performance requirements and regardless of whether they have been tested to comply with such requirements. For purposes of these investigations on aluminum extrusions from the People's Republic of China, only heat sinks designed and produced around meeting specified*

*thermal performance requirements and tested to comply with such requirements are included in the scope.*

*Merchandise that is comprised solely of aluminum extrusions or aluminum extrusions and fasteners, whether assembled at the time of importation or unassembled, is covered by the scope in its entirety.*

*The scope also covers aluminum extrusions that are imported with non-extruded aluminum components beyond fasteners, whether assembled at the time of importation or unassembled, that are a part or subassembly of a larger product or system. Only the aluminum extrusion portion of the merchandise described in this paragraph, whether assembled or unassembled, is subject to duties. Examples of merchandise that is a part or subassembly of a larger product or system include, but are not limited to, window parts or subassemblies; door unit parts or subassemblies; shower and bath system parts or subassemblies; solar panel mounting systems; fenestration system parts or subassemblies, such as curtain wall and window wall units and parts or subassemblies of storefronts; furniture parts or subassemblies; appliance parts or subassemblies, such as fin evaporator coils and systems for refrigerators; railing or deck system parts or subassemblies; fence system parts or subassemblies; motor vehicle parts or subassemblies, such as bumpers for motor vehicles; trailer parts or subassemblies, such as side walls, flooring, and roofings; electric vehicle charging station parts or subassemblies; or signage or advertising system parts or subassemblies. Parts or subassemblies described by this paragraph that are subject to duties in their entirety pursuant to existing antidumping and countervailing duty orders are excluded from the scope of these investigations, so long as they remain subject to the scope of such orders. Any part or subassembly that otherwise meets the requirements of this scope and that is not covered by other antidumping and/or countervailing duty orders remains subject to the scope of these investigations.*

*The scope excludes assembled merchandise containing non-extruded aluminum components beyond fasteners that is not a part or subassembly of a larger product or system and that is used as imported, without undergoing after importation any processing, fabrication, finishing, or assembly or the addition of parts or material, regardless of whether the additional parts or material are interchangeable.*

*The scope also excludes merchandise containing non-extruded aluminum components beyond fasteners that is not a part or subassembly of a larger product or system that enters unassembled as a packaged combination of parts to be assembled as is for its intended use, without*



*undergoing after importation any processing, fabrication, or finishing or the addition of parts or material, regardless of whether the additional parts or material are interchangeable. To be excluded under this paragraph, the merchandise must be sold and enter as a discrete kit on one Customs entry form.*

*Examples of such excluded assembled and unassembled merchandise include windows with glass, door units with door panel and glass, motor vehicles, trailers, furniture, and appliances.*

*The scope also includes aluminum extrusions that have been further processed in a third country, including, but not limited to, the finishing and fabrication processes described above, assembly, whether with other aluminum extrusion components or with non-aluminum extrusion components, or any other processing that would not otherwise remove the merchandise from the scope if performed in the country of manufacture of the in-scope product. Third-country processing; finishing; and/or fabrication, including those processes described in the scope, does not alter the country of origin of the subject aluminum extrusions.*

*The following aluminum extrusion products are excluded: aluminum extrusions made from an aluminum alloy with an Aluminum Association series designations commencing with the number 2 (or proprietary equivalents or other certifying body equivalents) and containing in excess of 1.5 percent copper by weight; aluminum extrusions made from an aluminum alloy with an Aluminum Association series designation commencing with the number 5 (or proprietary equivalents or other certifying body equivalents) and containing in excess of 2.0 percent magnesium by weight; and aluminum extrusions made from an aluminum alloy with an Aluminum Association series designation commencing with the number 7 (or proprietary equivalents or other certifying body equivalents) and containing in excess of 2.0 percent zinc by weight.*

*The scope also excludes aluminum alloy sheet or plates produced by means other than the extrusion process, such as aluminum products produced by a method of continuous casting or rolling. Cast aluminum products are also excluded. The scope also excludes unwrought aluminum in any form.*

*The scope also excludes collapsible tubular containers composed of metallic elements corresponding to alloy code 1080A as designated by the Aluminum Association (not including proprietary equivalents or other certifying body equivalents) where the tubular container (excluding the nozzle) meets each of the following dimensional characteristics: (1) length*

of 37 millimeters (mm) or 62 mm; (2) outer diameter of 11.0 mm or 12.7 mm; and (3) wall thickness not exceeding 0.13 mm.

*Also excluded from the scope of these investigations is certain rectangular wire, imported in bulk rolls or precut strips and produced from continuously cast rolled aluminum wire rod, which is subsequently extruded to dimension to form rectangular wire with or without rounded edges. The product is made from aluminum alloy grade 1070 or 1370 (not including proprietary equivalents or other certifying body equivalents), with no recycled metal content allowed. The dimensions of the wire are 2.95 mm to 6.05 mm in width, and 0.65 mm to 1.25 mm in thickness. Imports of rectangular wire are provided for under Harmonized Tariff Schedule of the United States (HTSUS) subheadings 7605.19.0000, 7604.10.5000, or 7616.99.5190.*

*Also excluded from the scope of these antidumping and countervailing duty investigations on aluminum extrusions from the People's Republic of China are all products covered by the scope of the antidumping and countervailing duty orders on Aluminum Extrusions from the People's Republic of China. See Aluminum Extrusions from the People's Republic of China: Antidumping Duty Order, 76 FR 30,650 (May 26, 2011); and Aluminum Extrusions from the People's Republic of China: Countervailing Duty Order, 76 FR 30,653 (May 26, 2011) (collectively, Aluminum Extrusions from the People's Republic of China). Solely for these investigations on aluminum extrusions from the People's Republic of China, the following is an exhaustive list of products that meet the definition of subject merchandise. Merchandise that is not included in the following list that meets the definition of subject merchandise in the 2011 antidumping and countervailing duty orders on Aluminum Extrusions from the People's Republic of China remains subject to the earlier orders. No other section of this scope language that provides examples of subject merchandise is exhaustive. The following products are included in the scope of these investigations on aluminum extrusions from the People's Republic of China, whether assembled or unassembled: heat sinks as described above; cleaning system components like mops and poles; banner stands/back walls; fabric wall systems; drapery rails; side mount valve controls; water heater anodes; solar panel mounting systems; 5050 alloy rails for showers and carpets; auto heating and cooling system components; assembled motor cases with stators; louver assemblies; event décor; window wall units and parts; trade booths; micro channel heat exchangers; telescoping poles, pole handles, and pole attachments; flagpoles; wind sign frames; foreline hose assembly; electronics enclosures; parts and subassemblies for storefronts, including portal sets; light poles; air duct registers; outdoor sporting goods parts and*

*subassemblies; glass refrigerator shelves; aluminum ramps; handicap ramp system parts and subassemblies; frames and parts for tents and clear span structures; parts and subassemblies for screen enclosures, patios, and sunrooms; parts and subassemblies for walkways and walkway covers; aluminum extrusions for LED lights; parts and subassemblies for screen, storm, and patio doors; pontoon boat parts and subassemblies, including rub rails, flooring, decking, transom structures, canopy systems, seating; boat hulls, framing, ladders, and transom structures; parts and subassemblies for docks, piers, boat lifts and mounting; recreational and boat trailer parts and subassemblies, including subframes, crossmembers, and gates; solar tracker assemblies with gears; garage door framing systems; door threshold and sill assemblies; highway and bridge signs; bridge, street, and highway rails; scaffolding, including planks and struts; railing and support systems; parts and subassemblies for exercise equipment; weatherstripping; door bottom and sweeps; door seals; floor transitions and trims; parts and subassemblies for modular walls and office furniture; truck trailer parts and subassemblies; boat cover poles, outrigger poles, and rod holders; bleachers and benches; parts and subassemblies for elevators, lifts, and dumbwaiters; parts and subassemblies for mirror and framing systems; window treatments; parts and subassemblies for air foils and fans; bus and RV window frames; sliding door rails; dock ladders; parts and subassemblies for RV frames and trailers; awning, canopy, and sunshade structures and their parts and subassemblies; marine motor mounts; linear lighting housings; and cluster mailbox systems.*

## **Tariff treatment**

Based upon the scope set forth by Commerce, information available to the Commission indicates that the merchandise subject to these investigations are imported under the following provisions of the Harmonized Tariff Schedule of the United States (“HTS”): 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040, and 7610.90.0080.<sup>19</sup> The 2023 general rate of duty is 1.5 percent ad valorem for

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<sup>19</sup> Merchandise subject to these investigations may also be imported under HTS statistical reporting numbers 6603.90.8100, 7606.12.3091, 7606.12.3096, 7615.10.2015, 7615.10.2025, 7615.10.3015, 7615.10.3025, 7615.10.5020, 7615.10.5040, 7615.10.7125, 7615.10.7130, 7615.10.7155, 7615.10.7180, 7615.10.9100, 7615.20.0000, 7616.10.9090, 7616.99.1000, 7616.99.5130, 7616.99.5140, 7616.99.5190, 8302.10.3000, 8302.10.6030, 8302.10.6060, 8302.10.6090, 8302.20.0000, 8302.30.3010, 8302.30.3060, (continued...)

HTS subheading 7604.21.00, 2.6 percent ad valorem for HTS subheadings 7604.10.30, and 7604.29.30, 3 percent ad valorem for HTS subheadings 7604.10.50 and 7604.29.50, 5 percent ad valorem for HTS subheadings 7604.10.10 and 7604.29.10, and 5.7 percent *ad valorem* for HTS subheadings 7608.10.00, 7608.20.00, 7609.00.00, 7610.10.00, and 7610.90.00.<sup>20</sup>

Originating goods of Colombia, Dominican Republic, Mexico and South Korea are eligible for duty-free entry under free trade agreements upon proper importer claim. Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

### **Section 301 tariff treatment**

Effective September 24, 2018, aluminum extrusions produced in China and imported under HTS subheading 7610.90.00 were subject to an additional 10 percent ad valorem duty under section 301 of the Trade Act of 1974. Effective May 10, 2019, the section 301 duty for imports under this subheading was increased to 25 percent ad valorem.<sup>21</sup>

Effective September 1, 2019, aluminum extrusions produced in China and imported under HTS 8-digit subheadings 7604.10.10, 7604.10.30, 7604.10.50, 7604.21.00, 7604.29.10, 7604.29.30, 7604.29.50, 7608.10.00, 7608.20.00, 7609.00.00, and 7610.10.00 were subject to

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8302.41.3000, 8302.41.6015, 8302.41.6045, 8302.41.6050, 8302.41.6080, 8302.42.3010, 8302.42.3015, 8302.42.3065, 8302.49.6035, 8302.49.6045, 8302.49.6055, 8302.49.6085, 8302.50.0000, 8302.60.3000, 8302.60.9000, 8305.10.0050, 8306.30.0000, 8414.59.6590, 8415.90.8045, 8418.99.8005, 8418.99.8050, 8418.99.8060, 8419.50.5000, 8419.90.1000, 8422.90.0640, 8424.90.9080, 8473.30.2000, 8473.30.5100, 8479.89.9599, 8479.90.8500, 8479.90.9596, 8481.90.9060, 8481.90.9085, 8486.90.0000, 8487.90.0080, 8503.00.9520, 8508.70.0000, 8513.90.2000, 8515.90.2000, 8516.90.5000, 8516.90.8050, 8517.71.0000, 8517.79.0000, 8529.90.7300, 8529.90.9760, 8536.90.8585, 8538.10.0000, 8541.90.0000, 8543.90.8885, 8547.90.0020, 8547.90.0030, 8708.10.3050, 8708.29.5160, 8708.80.6590, 8708.99.6890, 8807.30.0060, 9031.90.9195, 9401.99.9081, 9403.99.1040, 9403.99.9010, 9403.99.9015, 9403.99.9020, 9403.99.9040, 9403.99.9045, 9405.99.4020, 9506.11.4080, 9506.51.4000, 9506.51.6000, 9506.59.4040, 9506.70.2090, 9506.91.0010, 9506.91.0020, 9506.91.0030, 9506.99.0510, 9506.99.0520, 9506.99.0530, 9506.99.1500, 9506.99.2000, 9506.99.2580, 9506.99.2800, 9506.99.5500, 9506.99.6080, 9507.30.2000, 9507.30.4000, 9507.30.6000, 9507.30.8000, 9507.90.6000, 9547.90.0040, and 9603.90.8050.

<sup>20</sup> USITC, HTSUS (2023) Revision 11, USITC Publication 5464, September 2023, pp. 76-5 – 76-10.

<sup>21</sup> 83 FR 47974, September 21, 2018; 84 FR 20459, May 9, 2019. See also HTS headings 9903.88.03 and 9903.88.04 and U.S. notes 20(e)–20(g) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTSUS (2023) Revision 11, USITC Publication 5464, September 2023, pp. 99-III-26–99-III-51, 99-III-293. Goods exported from China to the United States prior to May 10, 2019, and entering the United States prior to June 1, 2019, were not subject to the escalated 25 percent duty (84 FR 21892, May 15, 2019).

additional 15 percent ad valorem under section 301 of the Trade Act of 1974. Effective February 14, 2020, the section 301 duty for imports under this subheading was reduced to 7.5 percent.<sup>22</sup>

### **Section 232 tariff treatment**

Effective March 23, 2018, aluminum extrusions imported under HTS headings 7604, 7608, and 7609 originating in China, Colombia, the Dominican Republic, Ecuador, India, Indonesia, Malaysia, Taiwan, Thailand, Turkey, the United Arab Emirates, and Vietnam are subject to an additional 10 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended.<sup>23</sup>

Aluminum extrusions imported under the aforementioned HTS headings originating in Italy were initially exempt from section 232 tariffs until June 1, 2018, when they, along with other EU countries became subject to the tariffs. Effective January 1, 2022, Italy and other EU countries are exempt from section 232 tariffs and instead subject to tariff-rate quotas (TRQs).<sup>24</sup> The TRQ level for aluminum products originating in Italy is 9000 kg (9.92 short tons) per year and covers aluminum extrusions and out of scope products.<sup>25</sup>

Aluminum extrusions imported under the aforementioned HTS headings originating in South Korea were also initially exempt from section 232 tariffs until May 1, 2018, when they became subject to the 10 percent ad valorem tariffs.<sup>26</sup>

Aluminum extrusions imported under the aforementioned HTS headings originating in Mexico were initially exempt from section 232 tariffs until June 1, 2018, when they then became subject to the 10 percent ad valorem tariffs. Mexico's exemption from the section 232 tariffs was reinstated effective May 20, 2019.<sup>27</sup>

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<sup>22</sup> See 84 FR 43304, August 20, 2019; 84 FR 45821, August 30, 2019; and 85 FR 3741, January 22, 2020. See also HTS heading 9903.88.15 and U.S. notes 20(r) and 20(s) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTSUS (2023) Revision 11, USITC Publication 5464, September 2023, pp. 99-III-86 – 99-III-100, 99-III-295.

<sup>23</sup> 83 FR 11619, March 15, 2018. See also HTS heading 9903.80.01 and U.S. notes 16(a) and 16(b) OR HTS heading 9903.85.01 and U.S. notes 19(a) and 19(b) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTSUS (2023) Revision 11, USITC Publication 5464, July 2022, pp. 99-III-23–99-III-26, 99-III-293.

<sup>24</sup> 83 FR 13355, March 28, 2018); 83 FR 20677, May 7, 2018; 83 FR 25849, June 5, 2018.

<sup>25</sup> U.S. Customs and Border Protection (“CBP”), “European Union Section 232 Aluminum Tariff Rate Quota (TRQ) 2023)” accessed October 11, 2023, <https://www.cbp.gov/sites/default/files/assets/documents/2023-Jan/EU%20Aluminum%202023%20TRQ%20Limits%20%282%29.pdf>.

<sup>26</sup> 83 FR 20677, May 7, 2018.

<sup>27</sup> 83 FR 20677 May 7, 2018; 83 FR 25849, June 5, 2018; 84 FR 23983, May 23, 2019.

Effective December 14, 2020, certain aluminum extrusions under HTS statistical reporting numbers 7604.21.0010, 7604.29.1010, 7604.29.5090, and 7609.00.0000 have been excluded from section 232 duties and/or quotas through a General Approved Exclusion.<sup>28</sup>

## The product

### Description and applications

Aluminum extrusions are shapes and forms produced via an extrusion process of aluminum alloys having metallic elements falling within the alloy<sup>29</sup> series designations commencing with the numbers 1, 3, and 6,<sup>30</sup> or with the number 5 and having a magnesium content up to but not more than 2 percent of total by weight, as published by the Aluminum Association (or proprietary equivalents or other certifying body equivalents).<sup>31</sup> Aluminum extrusions are produced and imported in a wide variety of shapes and forms, including, but not limited to, hollow profiles, pipes, tubes, bars and rods, and other solid profiles (figure I-1). Solid profiles can include angles, tees, I-beams, H-beams, channels, tracks, rails, mullions, stiles, gutters, and other shapes. Aluminum extrusions also include those that are subsequently drawn (drawn aluminum), as well as aluminum extrusions that have been subjected to one or more finishing or fabrication processes. These products can also be comprised solely of aluminum extrusions (and fasteners, if any) either assembled or unassembled. Aluminum extrusions can also be imported with other components beyond fasteners, whether assembled or not assembled.

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<sup>28</sup> 85 FR 81060, December 14, 2020.

<sup>29</sup> Alloyed aluminum or aluminum alloy is a chemical composition where other elements such as iron, silicon, copper, magnesium, manganese, and zinc are added to pure molten aluminum in order to enhance its properties.

<sup>30</sup> So-called “soft-alloys,” commonly used for extrusion due to their good workability, formability, or extrudability.

<sup>31</sup> Aluminum alloys may be identified using a four-digit number, with the first digit of the number identifying the class or series of the alloy. 1XXX series aluminum alloy is commercially pure and commonly used in electrical applications and food packaging. 3XXX series aluminum alloy is alloyed with a small amount of manganese and sometimes magnesium and serves as a general-purpose alloy because it has moderate strength and good workability. 6XXX series aluminum alloy uses silicon and magnesium and is used in automotive, architectural, and structural applications. 5XXX series aluminum alloys contain magnesium and are used in construction, storage tanks, pressure vessels, and more. 8XXX series aluminum alloy is a category of other alloys not included in the series numbered one through seven and can contain alloying elements such as iron or nickel. Aluminum Association, “Aluminum Alloys 101,” 2021, accessed November 1, 2023.

Figure I-1  
Aluminum extrusions: Images



Source: McHone Industries, "Aluminum Tubing Traits," accessed October 24, 2023. <https://www.mchoneind.com/aluminum-tubing-traits/>; Prime-line, "Window Frame," accessed October 24, 2023. <https://www.primeline.net/pl-14163-516-extruded-window-frame-72-long-white-finish>; IndiaMart, "Aluminium Profiles," accessed October 24, 2023. <https://www.indiamart.com/global-aluminium/aluminium-profiles.html>.

Note: Images from left to right: extruded aluminum tubing, window profile, hollow profiles.

The proposed scope excludes merchandise containing non-extruded aluminum components beyond fasteners (such as nuts, bolts, clamps, etc.) used as imported and not a part or subassembly of a larger product or system.<sup>32</sup>

Aluminum extrusions have a wide variety of finished goods applications. Major end-use applications for aluminum extrusions include:

- Building and Construction. Windows, doors, high-rise curtainwall, skylights, sunshades, highway and bridge construction, framing members, other various structures;
- Transportation. Automotive (cars, buses, trucks, trailer/van/container vehicles), heavy rail, light rail and other mass transit vehicles, recreational vehicles, aircraft, aerospace, marine, defense; and

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<sup>32</sup> Examples include windows with glass, door units with door panels and glass, motor vehicles, trailers, furniture, appliances, and solar panels. Additionally, the scope excludes aluminum alloy sheet or plates produced by methods other than the extrusion process; aluminum products produced by the casting method; unwrought aluminum in any form; certain collapsible tubular containers and rectangular wire as described in the scope language, and aluminum extrusions falling within alloy series designations of the Aluminum Association commencing with the number 2 and containing in excess of 1.5 percent copper by weight, number 5 and containing in excess of 2 percent magnesium by weight, and 7 and containing in excess of 2 percent zinc by weight (or proprietary equivalents or other certifying body equivalents). Also known as "hard alloys," these extrusions possess high strength over a wide range of temperatures and are used in aerospace, aircraft, and competitive sporting equipment applications.

- **Engineered Products.** Consumer and commercial products - appliances, furniture, garden tools, ladders, flashlights, lighting, sports equipment, pleasure boats, golf carts; robotics, hydraulics, heat sinks, bus bars; machinery and equipment, solar power mounting systems, food displays, refrigeration, medical equipment, display structures, laboratory equipment and apparatus.

While aluminum extrusions can have certain differences in physical characteristics<sup>33</sup> and distinct end uses based on sector and specific end user requirements,<sup>34</sup> they share similar general physical characteristics and a range of tolerances and are all used as inputs (i.e., an intermediate product) in the production of downstream products.

## **Manufacturing processes**

The manufacturing processes for aluminum extrusions are summarized below.<sup>35</sup> In general, there are three distinct stages that include: (1) melting and refining or remelting of scrap, (2) casting molten aluminum into unwrought forms such as billet, and (3) extruding billets into shapes.

### **Melting and refining**

Aluminum is produced using either the primary smelting or secondary remelting process. Inputs for the primary smelting process are derived from aluminum-containing ore (i.e., bauxite) that is first mined then refined into aluminum-oxide (i.e., alumina) through a chemical reaction known as the Bayer process.<sup>36</sup> The alumina is then electrolytically smelted to

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<sup>33</sup> Physical characteristics of aluminum extrusions include different metal strengths (based on the length of the baking process used), appearances (based on the customer’s preference of finish), extrusion shapes (as required by the specific purchaser), and specific fabrications (provided for end users).

<sup>34</sup> For example, product used for automotive applications may be more “engineered” than commodity type extrusions used as building and construction materials.

<sup>35</sup> Unless otherwise specified, information in this section is derived from the following sources: Petition, pp. 13-15; Aluminum Extrusions from China (Second Review), Inv. Nos 701-TA-475 and 731-TA-1177, USITC Publication 5375, October 2022, pp. I-18 – I-20.

<sup>36</sup> During the Bayer process, bauxite is crushed, washed, dried, and dissolved with caustic soda. The remaining mixture is then filtered to remove impurities and then transferred to a precipitator tank where it is chemically reduced into alumina. For more information see The Aluminum Association, “Alumina Refining 101,” accessed November 1, 2023. <https://www.aluminum.org/alumina-refining-101>.



remove oxygen and produce molten aluminum metal (i.e., the Hall-Héroult process).<sup>37</sup> This process requires significant amounts of electricity. The molten aluminum produced through the smelting process is then alloyed with other nonferrous metals to enhance certain properties and characteristics. Aluminum can also be alloyed with other nonferrous metals later in the manufacturing process through a cladding process (described later in this section).

### **Remelting of scrap**

Instead of the primary smelting process, aluminum can also be produced by melting down aluminum scrap metal.<sup>38</sup> This material is called secondary aluminum. Secondary producers purchase large volumes of aluminum scrap, melt it down, and alloy it with primary aluminum and other metals in order to adjust the chemical composition. Most U.S. secondary aluminum producers rely on a combination of primary aluminum and scrap aluminum and may adjust the amount of primary aluminum they mix in depending on the availability and price of scrap metal relative to primary aluminum.<sup>39</sup> The desired characteristics of the final end use product are determined during the melting and refining stages.

### **Casting**

Following the production of molten aluminum with the desired properties, the molten aluminum is cast into a billet that can enter the extrusion process.<sup>40</sup> During this process, molten aluminum is transferred to a holding hearth where it is stored at the desired level of purity and temperature until it is ready to be fed into a casting unit with a mold. As the molten aluminum flows into the casting unit, cold water is pumped around the base of the mold. This cools the molten aluminum, solidifying it into the shape of the mold, producing a billet. The billets are then removed from the casting unit and sent to a homogenizing furnace. The homogenizing furnace reheats and then cools the billets in order to ensure the chemical composition of the billet is consistent across the piece of metal. This process creates a uniform product that is consistent in strength and more workable for machining.<sup>41</sup>

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<sup>37</sup> For more information on the Hall-Héroult process, see The Aluminum Association, “Primary Production 101,” accessed November 1, 2023. <https://www.aluminum.org/primary-production-101>.

<sup>38</sup> Petitioners note that the share of primary aluminum versus secondary aluminum used in the production of extrusions may vary by country. Preliminary conference transcript p. 140.

<sup>39</sup> Aluminum: Competitive Conditions Affecting the U.S. Industry, Inv. No. 332-557, USITC Publication 4703, June 2017, pp. 138, 166-167.

<sup>40</sup> Billets are long, solid pieces of aluminum with a cylindrical shape.

<sup>41</sup> L&L Furnace, “Aluminum Heat Treatment: Homogenizing,” June 11, 2021. <https://llfurnace.com/blog/aluminum-heat-treatment-homogenizing>.

## Extrusion

After the billets have been homogenized, they are typically sent to a different facility or a different part of a vertically integrated facility. The billets are typically scalped, which removes the top layer of aluminum that may contain impurities or surface defects. The billets are then placed into a furnace to be reheated in order to make the aluminum more malleable (figure I-2). A film of lubricant is applied to the heated billet. From there, a heated billet enters the hydraulic extrusion press where a ram pushes a dummy block to force the softened metal through a precision opening, or die, to produce the desired shape.<sup>42</sup> Larger presses allow extruders to produce larger products.<sup>43</sup> As pressure is applied against the die, the billet becomes shorter and wider until its expansion is restricted by full contact with the container walls. As the pressure increases, the softened metal begins to squeeze out through the shaped orifice of the die and emerges as a fully formed profile. This is known as direct extrusion. Under indirect extrusion, the die is contained within a hollow ram, which moves into the stationary billet forcing the metal to flow into the ram, acquiring the shape of the die as it proceeds. In either process, the aluminum exiting the die acquires the same cross-sectional shape as the die. Materials such as liquid nitrogen flow around the die to cool it as the extruded aluminum is passing through it. This process protects the die and extends its life while also preventing the formation of oxides on the surface of the extruded shape. After emerging from the die, the extrusion cools, either naturally or through air or water quenching. The following steps usually occur after cooling:

- **Stretching.** A stretcher and/or straightener may be used to straighten the extrusion and correct any twisting that may have occurred during and after the extrusion process.
- **Cutting.** The profile is cut in order to reduce it to the specified commercial length. The cut product is in a “mill finish” at the conclusion of this phase.
- **Aging.** Certain extrusion alloys reach optimal strength through the process of aging, or age-hardening. The aging process ensures the uniform precipitation of fine particles through the metal, producing an alloy with maximum strength, hardness, and elasticity. Natural aging occurs at room temperature and artificial aging occurs through controlled heating in an aging oven. Non-heat-treatable aluminum alloys, including 3000 series alloys utilizing manganese, are

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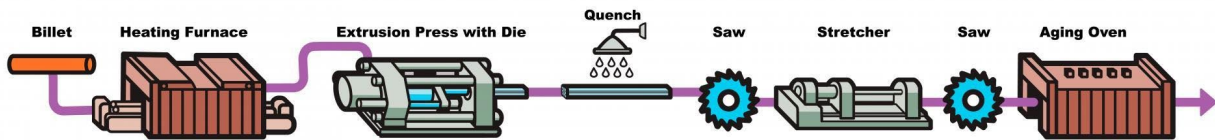
<sup>42</sup> Dies can be produced on-site by extruders or purchased from a third-party. Most extruders have die repair and maintenance within their facility. Preliminary conference transcript, pp. 132-133.

<sup>43</sup> Preliminary conference transcript, p. 141.

subject to natural aging. Artificial aging, also known as precipitation heat-treating, occurs through controlled heating in an aging oven.

The scope also includes extrusions that have been drawn subsequent to extrusion (drawn aluminum). In the case of draw aluminum, an extruded shape, after cooling, is subsequently drawn over a mandrel to create a hollow profile. This hollow profile may then be subject to natural or artificial aging to improve strength characteristics.

**Figure I-2**  
**Aluminum extrusions: Extrusion process**



Source: Aluminum Extruder’s Council (AEC), “Aluminum Extrusion Process Basics,” <https://aec.org/aluminum-extrusion-process>, accessed October 12, 2023.

“Mill finish” aluminum extrusions may be prepared for packaging and shipping to customers, or they may undergo additional finishing or processing, such as surface coating or treatments (e.g., painting, anodizing, sanding, acid-etching, nickel finishing, etc.). Aluminum extrusions may also undergo fabrication and/or assembly operations such as machining, including CNC machining, punching, drilling, notching, adding screws, etc. These operations are typically done by extruders producing fabricated extrusions as described in the scope. Once all finishing and/or fabrication operations are completed, the extrusions will be packaged and distributed to customers.

## Domestic like product issues

The Commission’s decision regarding the appropriate domestic product(s) that are “like” the subject imported product is based on a number of factors including: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) common manufacturing facilities, production processes, and production employees; (5) customer and producer perceptions; and (6) price.

Petitioners propose that the Commission should define a single domestic like product consisting of aluminum extrusions, coextensive with the scope of these investigations.<sup>44</sup>

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<sup>44</sup> Petitioners’ postconference brief, pp. 2-3.

Respondent Hydro Precision Tubing USA, LLC (“Hydro Precision”) argues that the Commission should define a separate domestic like product of aluminum extruded pipe and tube.<sup>45</sup> Respondent MAHLE argues that the Commission should determine that “aluminum extrusions imported with non-extruded aluminum components that are designed to be a part or subassembly of a larger product or system (collectively ‘subassemblies’) are a separate like product from aluminum extrusions.”<sup>46</sup> Respondents Johnson Controls Inc. (and its affiliates), Danfoss LLC, Streamlight Inc., Bracalente Manufacturing Co., Inc., Bracalente Metal Products (Suzhou) Co., Ltd., and Enclos Corp. (collectively, the “Downstream Industry Coalition”) argues that the Commission should find that “assemblies and complex aluminum parts” constitute a separate like product.<sup>47</sup> Respondent A.O. Smith Corporation argues that the Commission determine that water heater anodes are a separate like product.<sup>48</sup> Respondent Reflection Window + Wall LLC argues that the Commission should find window wall systems to be separate like products, or alternatively that extrusions subject to the prior AD/CVD orders on aluminum extrusions from China, as well as downstream subassemblies, are separate like products.<sup>49 50</sup>

In the prior investigations involving imports of aluminum extrusions from China, the Commission defined finished heat sinks (“FHS”) as a separate like product and determined that the domestic industry producing FHS was not materially injured or threatened with material injury by reason of imports of FHS from China.<sup>51</sup> The Commission collected information from U.S. producers and U.S. importers regarding the comparability of FHS and all other aluminum

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<sup>45</sup> Hydro Precision’s postconference brief, pp. 3-18.

<sup>46</sup> MAHLE’s postconference brief, pp. 1-16.

<sup>47</sup> Downstream Industry Coalition’s postconference brief, pp. 10-22. The coalition defines complex aluminum parts as “those parts that are manufactured from aluminum extrusions through {computer numerical control, or CNC} machining and/or hydroforming, such that the final part is a complex shape that no longer has a uniform cross section and therefore does not resemble the upstream aluminum profile.” Downstream Industry Coalition’s postconference brief, pp. 1-2.

<sup>48</sup> A.O. Smith’s postconference brief, p. 1. A.O. Smith also argues that water heater anodes are made with series 8 aluminum.

<sup>49</sup> Reflection’s postconference brief, pp. 12-15.

<sup>50</sup> The RV Industry Association also filed comments and stated that the Commission should find that “the types of parts and subassemblies” its members manufacture are separate like products. RV Industry Association’s postconference written statement, p. 3.

<sup>51</sup> Certain Aluminum Extrusions from China (Final), Inv. Nos. 701-TA-475 and 731-TA-1177, USITC Publication 4229, May 2011 (“Extrusions I final publication”), pp. 9 and 29. FHS are fabricated heat sinks, sold to electronics manufacturers, the design and production of which are organized around meeting certain specified thermal performance requirements and which have been fully, albeit not necessarily individually, tested to comply with such requirements. Extrusions I final publication, p. 3, fn. 1.

extrusions based on the factors identified above. These data are presented in tables I-2 and I-3 below.<sup>52</sup>

**Table I-2**

**Aluminum extrusions: Count of firms' responses regarding the domestic like factors comparing in-scope finished heat sinks to all other in-scope aluminum extrusions**

Count in number of firms reporting

Factor	Firm type	Fully	Mostly	Somewhat	Never
Physical characteristics	U.S. producers	9	7	2	1
Physical characteristics	Importers	2	2	1	7
Interchangeability	U.S. producers	8	3	6	1
Interchangeability	Importers	2	0	3	7
Channels	U.S. producers	10	3	4	0
Channels	Importers	4	1	3	2
Manufacturing	U.S. producers	13	3	2	0
Manufacturing	Importers	5	2	2	2
Perceptions	U.S. producers	9	5	3	1
Perceptions	Importers	3	2	0	6
Price	U.S. producers	11	3	3	1
Price	Importers	3	2	1	4

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

**Table I-3**

**Aluminum extrusions: Count of firms' responses regarding whether or not they had shipments (U.S. producers) or imports (U.S. importers) of finished heat sinks in 2022**

Count in number of firms reporting

Firm type	No	Yes
U.S. producers	20	9
Importers	45	3

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

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<sup>52</sup> Nine U.S. producers (\*\*\*) and three U.S. importers (\*\*\*) reported either U.S. shipments (U.S. producers) or imports into the U.S. (importers) of FHS in 2022.

Overall, shipments or imports of FHS comprised a \*\*\* share of U.S. shipments or imports reported by U.S. producers and importers, respectively. The aggregate reported share of U.S. producers' U.S. shipments in 2022 which were of finished heat sinks was \*\*\* percent of U.S. shipments (or \*\*\* short tons of FHS), while the aggregate reported share of U.S. importers' U.S. imports in 2022 which were of finished heat sinks \*\*\*.



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

### U.S. market characteristics

Aluminum extrusions are produced and imported in various shapes and forms, including but not limited to hollow profiles, solid profiles, pipes, tubes, bars and rods, and subsequently can be drawn, finished, or fabricated.<sup>1</sup> Extrusions are used in a variety of applications, including building and construction (e.g., windows, door railings, curtain walls, highway and bridge construction), transportation (e.g., automotive and electric vehicles, aircraft, rail), solar projects (e.g., frames and structural fasteners), and engineered production applications (e.g., air conditioners, appliances, lighting, refrigeration).<sup>2</sup> Aluminum extrusions performance characteristics include high strength, low weight, high corrosion-resistance, and machineability.<sup>3</sup> Some producers of aluminum extrusions make a variety of aluminum extrusions in the same facility.<sup>4</sup>

Certain aluminum extrusions have been subject to section 301 tariffs since August 2019.<sup>5</sup> Aluminum extrusions were also subject to section 232 tariffs beginning in March 2018; however, most aluminum extrusions were excluded from section 232 tariffs in December 2020.<sup>6</sup> Certain aluminum extrusions from China have been under antidumping and countervailing duty orders since May 2011.<sup>7</sup>

19 of 28 U.S. producers and 24 of 60 importers indicated that the market was subject to distinctive conditions of competition. The aluminum extrusion market has seen significant growth rapid economic changes and improvements in tolerances, a rise in demand for specific alloys, greater availability of products, fluctuation of market segment pricing, along with enhanced production capabilities, added-value services, and customer specific end-uses.

Apparent U.S. consumption of aluminum extrusions increased during 2020-22. Overall, apparent U.S. consumption in 2022 was 25.7 percent higher than in 2020.

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<sup>1</sup> Petition, p. 11.

<sup>2</sup> Petition, p. 12.

<sup>3</sup> Certain Aluminum Extrusions from China, Inv. Nos. 701-TA-475 and 731-TA-1177 (Final), USITC Publication 4229 (May 2011) (“China final”), p. II-5.

<sup>4</sup> Petition, p. 25.

<sup>5</sup> China’s Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation, 84 FR 43,304, August 20, 2019.

<sup>6</sup> 83 FR 11619, March 15, 2018, and 85 FR 81,060, December 14, 2020.

<sup>7</sup> 76 FR 30,650 and 76 FR 30,653, May 26, 2011.

## **Impact of section 301 tariffs and 232 tariffs**

U.S. producers and importers were asked to report if section 301 tariffs have impacted costs, price, or overall demand in the U.S. aluminum extrusion market. Most reporting producers (22 of 30) and importers (46 of 63) reported that the 301 tariffs did not have an impact or were unaware of the 301 tariffs' impact on the aluminum extrusion market. U.S. producers \*\*\* reported benefits in terms of relief and increased domestic opportunities while U.S. producers \*\*\* reported that the section 301 tariffs had minimal or no impact. \*\*\* stated that the section 301 tariffs increased demand and raised costs, while producer \*\*\* reported decreased availability of Chinese aluminum. Importers generally reported that the imposition of section 301 tariffs significantly affected the aluminum extrusion industry. Importers \*\*\* reported increased prices, decreased availability of Chinese aluminum extrusions, as well as shifts in production to other countries. Importers \*\*\* reported the need to find alternative supply chains to avoid the impact of duties. Importer \*\*\* stated that the section 301 tariffs resulted in the growth of aluminum extrusion industries of other countries like Vietnam and the Dominican Republic.

U.S. producers and importers were also asked to report if Section 232 tariffs have impacted costs, price, or overall demand in the U.S. aluminum extrusion market. Some U.S. producers reported that the imposition of section 232 tariffs on aluminum extrusions initially provided some relief to domestic producers, while other producers experienced minimal impact. Importers often reported that section 232 tariffs had an impact on the aluminum extrusion market. Importers \*\*\* noted that the tariffs have led to an overall increase in the cost of aluminum and other raw materials. Importer \*\*\* reported that the tariffs had a direct impact on domestic base metal pricing, and significantly raised raw material costs for extruders. Importer \*\*\* reported that the tariffs created panic in the market, leading to panic buying, longer lead times, and quality issues due to short-term demand. Importers \*\*\* indicated that the tariffs have also contributed to the underselling of imports. Importers \*\*\* reported at least a 10 percent direct increase in price due to the 232 tariffs.

## **Channels of distribution**

U.S. producers and importers of product from eight subject countries sold mainly to \*\*\* during 2018-2020, as shown in table II-1. U.S. importers of aluminum extrusions



from \*\*\* sold mainly to distributors, with \*\*\* importers selling exclusively to distributors.

**Table II-1**  
**Aluminum extrusions: 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	Distributor	***	***	***	***	***
United States	End user	***	***	***	***	***
China, subject	Distributor	***	***	***	***	***
China, subject	End user	***	***	***	***	***
Colombia	Distributor	***	***	***	***	***
Colombia	End user	***	***	***	***	***
Dominican Republic	Distributor	***	***	***	***	***
Dominican Republic	End user	***	***	***	***	***
Ecuador	Distributor	***	***	***	***	***
Ecuador	End user	***	***	***	***	***
India	Distributor	***	***	***	***	***
India	End user	***	***	***	***	***
Indonesia	Distributor	***	***	***	***	***
Indonesia	End user	***	***	***	***	***
Italy	Distributor	***	***	***	***	***
Italy	End user	***	***	***	***	***
Malaysia	Distributor	***	***	***	***	***
Malaysia	End user	***	***	***	***	***
Mexico	Distributor	***	***	***	***	***
Mexico	End user	***	***	***	***	***
South Korea	Distributor	***	***	***	***	***
South Korea	End user	***	***	***	***	***
Taiwan	Distributor	***	***	***	***	***
Taiwan	End user	***	***	***	***	***
Thailand	Distributor	***	***	***	***	***
Thailand	End user	***	***	***	***	***
Turkey	Distributor	***	***	***	***	***
Turkey	End user	***	***	***	***	***
United Arab Emirates	Distributor	***	***	***	***	***
United Arab Emirates	End user	***	***	***	***	***
Vietnam	Distributor	***	***	***	***	***
Vietnam	End user	***	***	***	***	***

Table continued

**Table II-1 Continued**  
**Aluminum extrusions: 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
Subject sources	Distributor	***	***	***	***	***
Subject sources	End user	***	***	***	***	***
China, nonsubject	Distributor	***	***	***	***	***
China, nonsubject	End user	***	***	***	***	***
All other sources	Distributor	***	***	***	***	***
All other sources	End user	***	***	***	***	***
Nonsubject sources	Distributor	***	***	***	***	***
Nonsubject sources	End user	***	***	***	***	***
All imports	Distributor	***	***	***	***	***
All imports	End user	***	***	***	***	***

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

Note: Distributor refers to either wholesalers or distributors.

## Geographic distribution

U.S. producers and importers reported selling aluminum extrusions to all regions in the contiguous United States (table II-2). For U.S. producers, 14.5 percent of sales were within 100 miles of their production facility, 68.5 percent were between 101 and 1,000 miles, and 17.0 percent were over 1,000 miles. Importers sold 18.2 percent within 100 miles of their U.S. point of shipment, 53.3 percent between 101 and 1,000 miles, and 28.5 percent over 1,000 miles.

**Table II-2**  
**Aluminum extrusions: Count of U.S. producers' and U.S. importers' geographic markets**

Source	Northeast	Midwest	Southeast	Central Southwest	Mountains
United States	23	26	27	23	21
China	7	9	9	9	7
Colombia	1	0	1	0	0
Dominican Republic	2	1	3	2	0
Ecuador	3	3	5	3	2
India	7	6	6	5	4
Indonesia	7	5	6	5	4
Italy	3	4	4	4	3
Malaysia	4	3	3	4	3
Mexico	6	10	10	12	7
South Korea	2	3	1	1	1
Taiwan	8	8	7	7	6
Thailand	2	5	4	4	2
Turkey	3	4	5	2	2
United Arab Emirates	1	1	2	2	1
Vietnam	5	5	6	4	4
All subject sources	32	32	37	30	22

Table continued

**Table II-2 Continued****Aluminum extrusions: Count of U.S. producers' and U.S. importers' geographic markets**

Source	Pacific Coast	Other	All regions (except Other)	Reporting firms
United States	20	8	15	28
China	7	3	7	10
Colombia	1	0	0	1
Dominican Republic	0	5	0	7
Ecuador	3	1	2	5
India	5	1	4	9
Indonesia	7	2	4	9
Italy	3	0	3	4
Malaysia	4	1	3	5
Mexico	7	6	6	16
South Korea	3	1	1	5
Taiwan	7	4	6	8
Thailand	2	2	2	5
Turkey	2	2	2	5
United Arab Emirates	2	1	1	3
Vietnam	5	4	3	9
All subject sources	29	18	20	50

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

Note: Other U.S. markets include AK, HI, PR, and VI. Firms may have shipped to multiple regions and firms may source from multiple markets. Therefore, totals cannot be summed across columns and rows, respectively.

## Supply and demand considerations

### U.S. supply

Table II-3 provides a summary of the supply factors regarding aluminum extrusions from U.S. producers and from subject countries. The subject countries with the largest reported capacity include (in order of 2022 capacity) \*\*\*. Reported capacity from combined subject countries increased from 2020 to 2022, with increases reported in nine countries and relatively unchanged or slightly decreased capacity in five countries.<sup>8</sup>

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<sup>8</sup> South Korea did not report capacity data.

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

Quantity in short tons; ratio and share in percent

<b>Source</b>	<b>Capacity 2020 (quantity)</b>	<b>Capacity 2022 (quantity)</b>	<b>Capacity utilization 2020 (ratio)</b>	<b>Capacity utilization 2022 (ratio)</b>
United States	1,607,519	1,695,110	74.5	80.1
China	***	***	***	***
Colombia	***	***	***	***
Dominican Republic	***	***	***	***
Ecuador	***	***	***	***
India	***	***	***	***
Indonesia	***	***	***	***
Italy	***	***	***	***
Malaysia	***	***	***	***
Mexico	***	***	***	***
South Korea	***	***	***	***
Taiwan	***	***	***	***
Thailand	***	***	***	***
Turkey	***	***	***	***
United Arab Emirates	***	***	***	***
Vietnam	***	***	***	***
All subject	1,247,644	1,347,043	73.5	81.0

Table continued

**Table II-3 Continued**

**Aluminum extrusions: Supply factors that affect the ability to increase shipments to the U.S. market, by country**

Quantity in short tons; ratio and share in percent

Source	Inventories as a ratio to total shipments 2020	Inventories as a ratio to total shipments 2022	Home market shipments (percent of total shipments) 2022	Exports to non-U.S. markets (percent of total shipments) 2022	Able to shift to alternative products (number of firms)
United States	3.6	4.5	94.8	5.2	0 of 29
China	***	***	***	***	***
Colombia	***	***	***	***	***
Dominican Republic	***	***	***	***	***
Ecuador	***	***	***	***	***
India	***	***	***	***	***
Indonesia	***	***	***	***	***
Italy	***	***	***	***	***
Malaysia	***	***	***	***	***
Mexico	***	***	***	***	***
South Korea	***	***	***	***	***
Taiwan	***	***	***	***	***
Thailand	***	***	***	***	***
Turkey	***	***	***	***	***
United Arab Emirates	***	***	***	***	***
Vietnam	***	***	***	***	***
All subject	5.7	4.8	58.9	20.8	2 of 50

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

Note: Responding U.S. producers accounted for a majority U.S. production of aluminum extrusions in 2022. Responding foreign producer/exporter firms accounted for more than 75 percent of U.S. imports of aluminum extrusions from subject countries during 2022. No data were reported for South Korea. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Part I, "Summary Data and Data Sources."

## **Domestic production**

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

## **Subject imports from subject countries**

In general, producers in subject countries have the ability to respond to changes in demand with moderate-to-large changes in the quantity of shipments of aluminum extrusion to the U.S. market, although the ability to respond varies by country. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity and an ability to shift shipments from alternative markets and production. Factors mitigating responsiveness of supply include a limited ability to shift shipments from inventories and lead times.

Production capacity in most reporting subject countries increased during 2020-22. Specifically, capacity utilization increased in eight countries, with significant increases from Mexico (\*\*\*) , Turkey (\*\*\*) , and India (\*\*\*) ; while capacity utilization remained relatively constant or slightly decreased for six subject countries.<sup>9</sup> In 2022, nine subject countries had capacity utilization rates between 60 and 90 percent, two had rates below 60 percent<sup>10</sup> and three (\*\*\*) had rates over 90 percent.

Reported inventories (as a share of shipments) in most of the subject countries decreased between 2020 and 2022 and the share of inventories in most countries was lower than U.S. producers' inventories. One subject country reported relatively high inventory-to-shipment ratios, \*\*\*.

Combined subject countries' exports to both the United States and to other markets accounted for about \*\*\* percent of their total sales, although the shares varied widely by country. Shares of shipments to each countries' home market ranged from less than 7.5 percent to over 82.6 percent. Six countries' reported shares of shipments to the home market

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<sup>9</sup> The Commission did not receive any questionnaire responses from foreign producers in South Korea.

<sup>10</sup> Countries with capacity utilization rates below 60 percent include \*\*\*.

ranged from 30 to 70 percent. Subject country exports to non-U.S. markets ranged from 1 percent to over 50 percent with most countries' exports ranging from 15 to 40 percent. Four subject countries, including three with the largest capacity (\*\*\*) , exported more than one-third of their total shipments to non-U.S. markets in 2022, indicating that there is some ability to shift shipments from alternate markets. Only two foreign producers indicated an ability to shift production from aluminum extrusion to other products.<sup>11</sup>

### **Imports from nonsubject sources**

Nonsubject imports accounted for 22.2 percent of total U.S. imports in 2022. The largest source of nonsubject imports during 2020-22 were from Canada and Germany. Combined, these countries accounted for 74.6 percent of nonsubject imports in 2022.

### **Supply constraints**

Twenty-two of 29 U.S. producers and 34 of 59 importers reported that they had experienced supply constraints since January 1, 2020. U.S. producers in the aluminum extrusion industry report various challenges and constraints. These included labor shortages, over-buying by customers resulting in supply shortages in the market, the inability to compete with unfairly traded imports, capacity constraints, and the impact of COVID-19 on operations and supply chains. In addition to these challenges, some producers experienced temporary limitations in meeting increased demand post-COVID, while others faced disruptions in the supply chain due to raw material shortages. The pandemic also resulted in extended lead times and allocation for select customers, as well as a decline in demand due to declining market conditions.

Importers reported various supply constraints, largely due to the COVID-19 pandemic. These challenges included insufficient domestic supplier capacity, international shipping availability constraints, labor shortages, increased demand exceeding capacity, and supply chain restraints. These factors have led to extended lead times, allocation restrictions, and delays in meeting customer demands. Importers \*\*\* mentioned shortages and delay lead times due to the pandemic. Importer \*\*\* stated that there was insufficient domestic U.S. supplier capacity from August 2021 to October 2022. Importer \*\*\* indicated that international shipping availability constrained supply over a significant period. Importers \*\*\* experienced a ramp-up in demand, which led to a short-term capacity shortage.

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<sup>11</sup> These other products included \*\*\*.



## U.S. demand

Based on available information, the overall demand for aluminum extrusions is likely to experience moderate changes in response to changes in price. The main contributing factors are the somewhat limited range of substitute products and the wide range of cost sharing percentages across various end-use products.

### End uses and cost share

U.S. demand for aluminum extrusions depends on the demand for U.S.-produced downstream products. Reported end uses include building and construction, doors and windows, automotive, trailers, marine vehicles, solar applications, and electrical applications.

Given the wide variety of end uses for aluminum extrusions, U.S. producers and importers reported a wide range of cost shares, depending on the end-use products. Reported cost shares for some end uses were as follows:<sup>12</sup>

- \*\*\* percent for automotive/recreational vehicle applications,
- \*\*\* percent for building and construction components,
- \*\*\* percent for condensers,
- \*\*\* percent for doors and windows,
- \*\*\* percent for electrical,
- \*\*\* percent for fencing,
- \*\*\* percent for marine applications,
- \*\*\* percent for solar mounting, and
- \*\*\* percent for trailers

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<sup>12</sup> Some firms reported that aluminum extrusions make up \*\*\* percent of the costs of building and construction components.

## Business cycles

Twenty of 29 U.S. producers and 31 of 62 importers indicated that the U.S. aluminum extrusions market was subject to business cycles. Specifically, firms stated that the aluminum extrusion market experiences seasonal fluctuations and is influenced by business cycles. Demand typically increases in spring and summer, particularly in the construction, automotive, and recreational vehicle industries. Factors like interest rates, economic growth, and weather events like hurricanes also impact demand. U.S. producers \*\*\* reported that a substantial portion of their annual sales occur in quarter two and quarter three, with demand slowing in quarter four. Market changes, holidays, and election years are also mentioned as factors influencing business cycles. Importers \*\*\* noted that the pandemic, recession, construction of new homes, and annual hurricane season projections and outcomes significantly impacted their demand.

## Demand trends

Given the wide variety of applications for aluminum extrusions, a variety of industries influence demand for aluminum extrusions. Notably, aluminum extrusions are widely used in residential and non-residential construction<sup>13</sup> and automobile production.<sup>14</sup>

New housing starts, as a proxy for demand for aluminum extrusions used in construction, have fluctuated since January 2020. Housing starts generally increased from January 2020 to April 2022, with a substantial drop in housing starts in April 2020 related to the COVID-19 pandemic.<sup>15</sup> After April 2022, housing starts have fluctuated but generally

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<sup>13</sup> As noted above, applications in the construction industry include windows, doors railings, curtain walls, window walls, highway and bridge construction, framing members. Petition, p. 12.

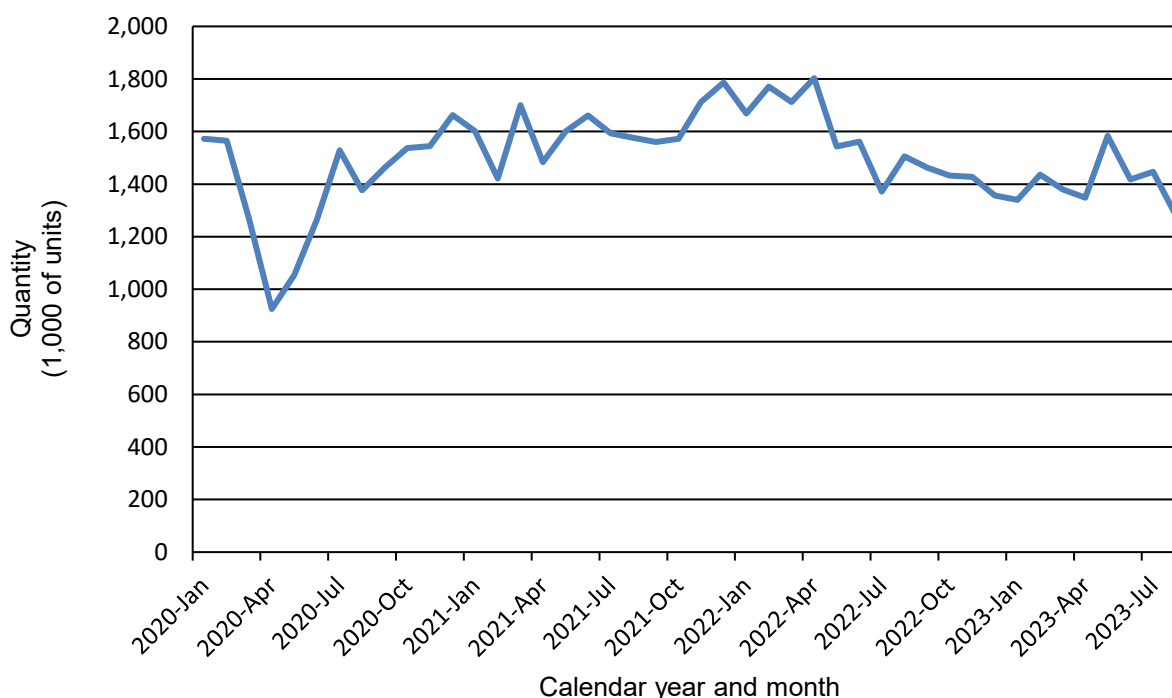
<sup>14</sup> There has been a shift in the automotive industry towards lightweighting, or minimizing vehicle weight, by using more aluminum components. Electric vehicles, which typically have bigger and heavier batteries, particularly use more aluminum to offset weight. Aluminum also absorbs more energy per kilogram than steel, making it safer in a crash, and aluminum-bodied cars have less general damage than steel-bodied vehicles. The pros of lightweighting with aluminum in a battery-powered world, *Automotive World*, (July 28, 2022), <https://www.automotiveworld.com/articles/the-pros-of-lightweighting-with-aluminium-in-a-battery-powered-world/>, retrieved October 12, 2023.

<sup>15</sup> Housing starts contracted during the COVID-19 pandemic due to delays from state and local permitting offices and supply chain disruptions, such as shortages of lumber, appliances, and specialized labor. Roisin McCord, *The Housing Market and the Pandemic*, Federal Reserve Bank of Richmond, *Econ Focus*, Vol. 25, No. 3 (Fourth Quarter 2020) [https://www.richmondfed.org/publications/research/econ\\_focus/2020/q4/q4](https://www.richmondfed.org/publications/research/econ_focus/2020/q4/q4), retrieved October 17, 2023.

decreased, as high mortgage rates have depressed some demand for new housing.<sup>16 17</sup> Overall, new housing starts have decreased by 13.7 percent from January 2020 to December 2022. From December 2022 to September 2023, the average housing starts were relatively unchanged.

**Figure II-1**

**New privately-owned housing starts: Total units, thousands of units, monthly, seasonally adjusted annual rate, January 2020-September 2023**



Source: U.S. Census Bureau and U.S. Department of Housing and Urban Development, New Privately-Owned Housing Units Started: Total Units (HOUST), retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/HOUST>, retrieved November 01, 2023.

<sup>16</sup> Lucia Mutikani, US housing starts hit three-year low; surge in permits point to underlying strength, Reuters, (September 19, 2023), <https://www.reuters.com/world/us/us-single-family-housing-starts-tumble-august-2023-09-19/> retrieved October 17, 2023.

<sup>17</sup> The Federal Reserve Funds effective rate decreased from January 2020 to March 2020 where it was relatively stable around 0.08 to 0.09 percent until March 2022 when it increased to 0.2 percent. Since March 2022, the rate has increased to 5.33 in September 2023. Board of Governors of the Federal Reserve System (US), Federal Funds Effective Rate (FEDFUNDS), retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/FEDFUNDS>, October 16, 2023.

**Table II-4****New privately-owned housing starts: Total units, thousands of units, monthly, seasonally adjusted annual rate, January 2020-August 2023**

Thousands of units

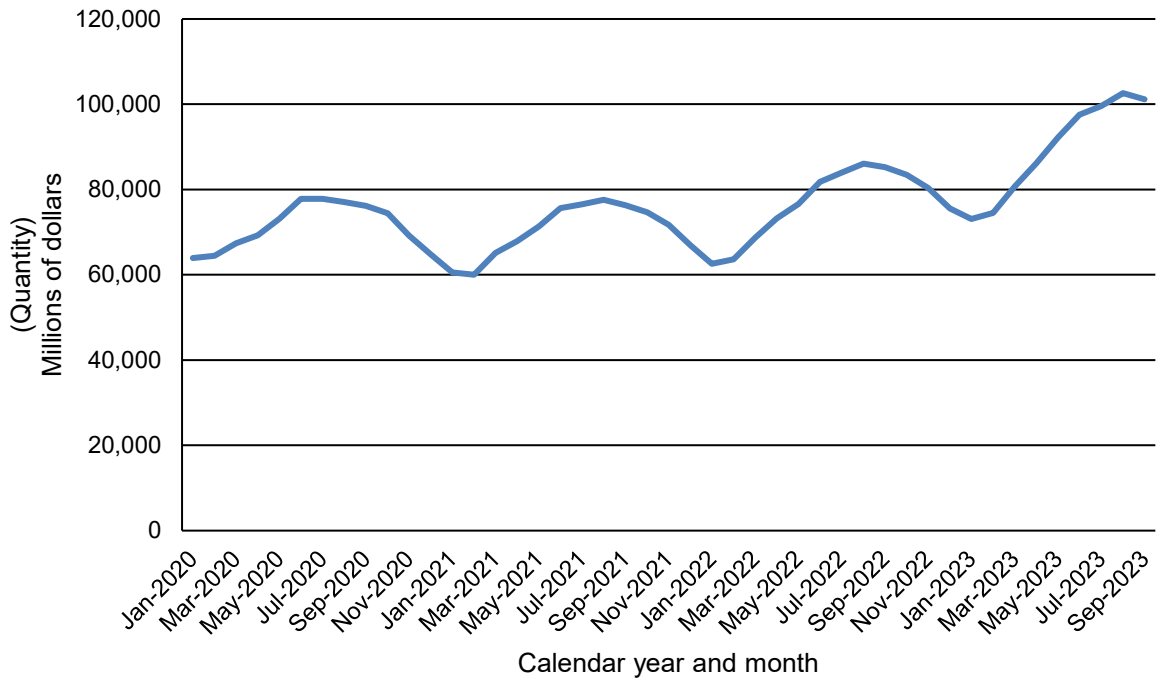
Year	Month	New privately-owned housing starts
2020	January	1572
2020	February	1565
2020	March	1267
2020	April	925
2020	May	1054
2020	June	1266
2020	July	1529
2020	August	1377
2020	September	1463
2020	October	1537
2020	November	1545
2020	December	1663
2021	January	1602
2021	February	1422
2021	March	1700
2021	April	1484
2021	May	1600
2021	June	1661
2021	July	1593
2021	August	1576
2021	September	1560
2021	October	1572
2021	November	1712
2021	December	1787
2022	January	1669
2022	February	1771
2022	March	1713
2022	April	1803
2022	May	1543
2022	June	1561
2022	July	1371
2022	August	1505
2022	September	1463
2022	October	1432
2022	November	1427
2022	December	1357
2023	January	1340
2023	February	1436
2023	March	1380
2023	April	1348
2023	May	1583
2023	June	1418
2023	July	1447
2023	August	1283
2023	September	1358

Source: U.S. Census Bureau and U.S. Department of Housing and Urban Development, New Privately-Owned Housing Units Started: Total Units (HOUST), retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/HOUST>, retrieved November 01, 2023.

Aluminum extrusions are utilized in various types of non-residential commercial construction. Therefore, the demand for aluminum extrusions is also derived from the demand for non-residential construction, infrastructure projects, commercial and institutional construction. As such, an uptick in nonresidential construction spending signals an increase in demand for aluminum extrusions. Monthly values of nonresidential construction spending are shown in figure II-2. Non-residential construction spending increased by 18.2 percent between January 2020 and December 2022 and by 33.8 percent from December 2022 to September 2023, suggesting higher demand for aluminum extrusions.

**Figure II-2**

**Non-residential construction spending: Millions of dollars, monthly, non-seasonally adjusted monthly value, January 2020-September 2023**



Source: U.S. Census Bureau non-residential construction spending: Millions of dollars, retrieved from U.S. Census Bureau, Business and Industry; <https://www.census.gov/construction/c30/c30index.html>, retrieved November 01, 2023.

**Table II-5**  
**Non-residential construction spending: Millions of dollars, monthly, non-seasonally adjusted**  
**monthly value, January 2020-September 2023**

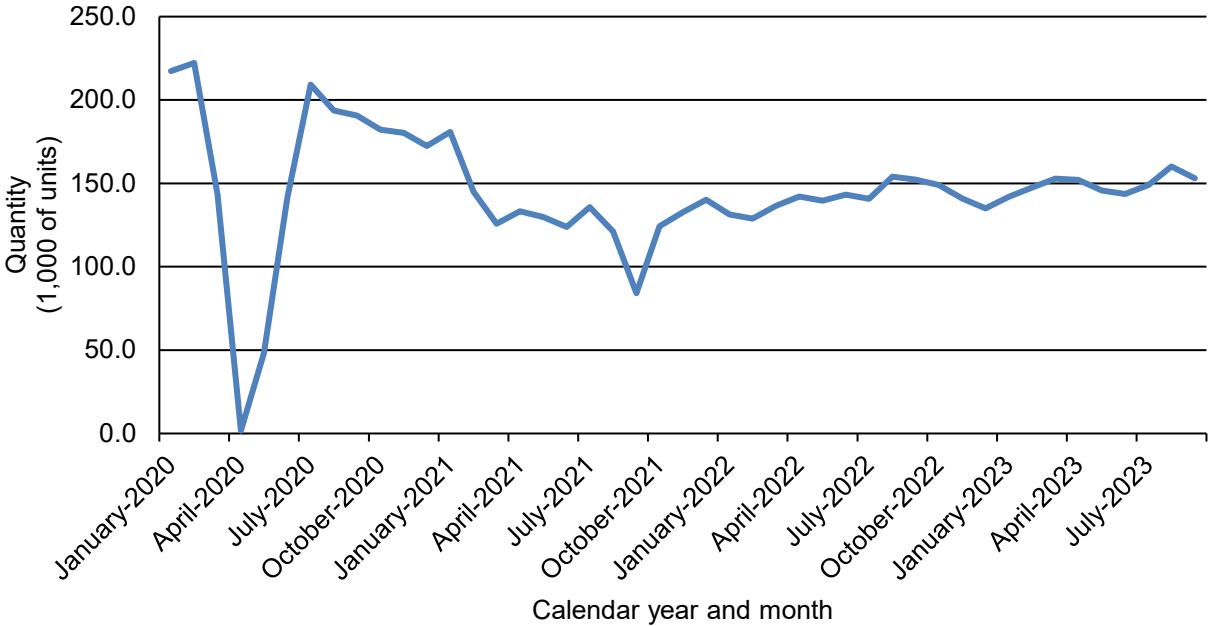
Thousands of units

Year	Month	Non-residential construction spending
2020	January	63,943
2020	February	64,441
2020	March	67,351
2020	April	69,259
2020	May	73,156
2020	June	77,815
2020	July	77,799
2020	August	77,032
2020	September	76,200
2020	October	74,408
2020	November	69,185
2020	December	64,724
2021	January	60,592
2021	February	60,017
2021	March	65,142
2021	April	67,890
2021	May	71,366
2021	June	75,653
2021	July	76,559
2021	August	77,610
2021	September	76,308
2021	October	74,634
2021	November	71,701
2021	December	66,937
2022	January	62,550
2022	February	63,656
2022	March	68,716
2022	April	73,241
2022	May	76,605
2022	June	81,805
2022	July	83,936
2022	August	86,106
2022	September	85,236
2022	October	83,411
2022	November	80,384
2022	December	75,590
2023	January	73,097
2023	February	74,531
2023	March	80,750
2023	April	86,127
2023	May	92,231
2023	June	97,562
2023	July	99,596
2023	August	102,609
2023	September	101,167

Source: U.S. Census Bureau non-residential construction spending: Millions of dollars, retrieved from U.S. Census Bureau, Business and Industry; <https://www.census.gov/construction/c30/c30index.html>, retrieved November 01, 2023.

Domestic automobile production generally decreased from 2020-22, with a significant decline in April and May 2020 as automobile producers closed manufacturing facilities due to the COVID-19 pandemic. Moreover, the global shortage of semiconductor chips has also affected automobile production, as seen in 2021. Supply chain issues and other production related issues hampered automotive production during 2020-22, and production has generally increased in 2023.<sup>18</sup> Overall, seasonally adjusted domestic production decreased by 37.9 percent from January 2020 to December 2022. From December 2022 to September 2023, production has increased by 13.3 percent.

**Figure II-3**  
**Domestic automobile production: Thousands of units, monthly, seasonally adjusted, January 2020-August 2023**



Source: U.S. Bureau of Economic Analysis, Domestic Auto Production (DAUPSA), retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/DAUPSA>, retrieved November 01, 2023.

<sup>18</sup> Automotive Supply Chain Update, Center for Automotive Research, (June 22, 2022), <https://www.cargroup.org/auto-supply-chain-update/>, retrieved October 12, 2023.



**Table II-6**  
**Domestic automobile production: Thousands of units, monthly, seasonally adjusted, January 2020-August 2023**

Thousands of units

Year	Month	Domestic automobile production
2020	January	217.3
2020	February	222.2
2020	March	143.3
2020	April	1.7
2020	May	48.2
2020	June	141.3
2020	July	209.3
2020	August	193.8
2020	September	190.6
2020	October	182.2
2020	November	180.2
2020	December	172.5
2021	January	180.9
2021	February	145.0
2021	March	125.8
2021	April	133.2
2021	May	129.9
2021	June	123.8
2021	July	135.7
2021	August	121.2
2021	September	84.1
2021	October	124.2
2021	November	132.7
2021	December	140.2
2022	January	131.4
2022	February	128.8
2022	March	136.6
2022	April	142.1
2022	May	139.5
2022	June	143.2
2022	July	140.7
2022	August	154.0
2022	September	152.3
2022	October	149.0
2022	November	141.0
2022	December	135.0
2023	January	141.9
2023	February	147.5
2023	March	152.8
2023	April	152.1
2023	May	145.8
2023	June	143.6
2023	July	148.9
2023	August	160.1
2023	September	153.0

Source: U.S. Bureau of Economic Analysis, Domestic Auto Production (DAUPSA), retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/DAUPSA>, retrieved November 01, 2023.

Most producers report a decrease in U.S. demand for aluminum extrusion while most importers report an increase in U.S. demand for aluminum extrusions since January 1, 2020 (table II-7).

**Table II-7**  
**Aluminum extrusions: Count of firms' responses regarding overall domestic and foreign demand, by firm type**

Market	Firm type	Steadily Increase	Fluctuate Up	No change	Fluctuate Down	Steadily Decrease
Domestic demand	U.S. producers	5	7	0	13	4
Domestic demand	Importers	19	16	8	14	4
Foreign demand	U.S. producers	3	1	1	8	2
Foreign demand	Importers	14	8	8	7	3

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

### Substitute products

Most U.S. producers (15 of 28) and a majority of importers (48 of 59) reported that there are no substitutes for aluminum extrusions. Those firms that described substitutes listed vinyl, plastic, steel, fiberglass, wood, and various other metals. Most firms that described substitutes also reported that the price of substitutes did have an effect on the price of aluminum extrusions.

### Substitutability issues

This section assesses the degree to which U.S.-produced aluminum extrusions and imports of aluminum extrusions from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of aluminum extrusions from domestic and imported sources based on those factors. Based on available data, staff believes that there is a moderate-to-high degree of substitutability between domestically produced aluminum extrusions and aluminum extrusions imported from subject sources.<sup>19</sup> Factors contributing to this level of substitutability include availability, similarities between domestically produced aluminum extrusions and aluminum extrusions imported from subject countries across multiple purchase factors, and interchangeability between domestic

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<sup>19</sup> The degree of substitution between domestic and imported aluminum extrusions depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced aluminum extrusions to the aluminum extrusions 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.).

and subject sources. Factors reducing substitutability include purchaser preferences for aluminum extrusions from subject sources over other sources, brand preference, and specific end-uses.

### Factors affecting purchasing decisions

Purchasers responding to lost sales lost revenue allegations<sup>20</sup> were asked to identify the main purchasing factors their firm considered in their purchasing decisions for aluminum extrusions. The major purchasing factors identified by firms include quality, price, and availability of supply.

#### Most important purchase factors

The most often cited top three factors' firms consider in their purchasing decisions for aluminum extrusions were quality (18 firms), price (15 firms), and availability/supply (6 firms) as shown in table II-8. Quality was the most frequently cited first-most important factor (cited by 13 firms), followed by price (2 firms); quality was also the most frequently reported second-most important factor (5 firms); and price was the most frequently reported third-most important factor (11 firms).

**Table II-8**  
**Aluminum extrusions: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor**

Factor	First	Second	Third	Total
Price / Cost	2	2	11	15
Quality	13	5	0	18
Availability / Supply	1	3	3	6
All other factors	5	11	6	NA

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

Note: Other factors include customer service, capability, production capacity, relationship, minimum order quantity, compliance, and brand.

#### Lead times

Aluminum extrusions are primarily produced-to-order. U.S. producers reported that 92.8 percent of their commercial shipments were produced-to-order, with lead times averaging 30 days. The remaining 7.2 percent of their commercial shipments came from inventories, with lead times averaging 4 days. Importers reported 85.7 percent of commercial shipments were produced-to-order with lead times averaging 52 days. Importers

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<sup>20</sup> This information is compiled from responses by purchasers identified by Petitioners to the lost sales lost revenue allegations. See Part V for additional information.

remaining 14.2 percent of commercial shipments came from U.S. inventories 9.8 percent and foreign inventories 4.4 percent.

### Comparison of U.S.-produced and imported aluminum extrusions

In order to determine whether U.S.-produced aluminum extrusions can generally be used in the same applications as imports from subject sources, U.S. producers and importers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables II-9 to II-10, most responding U.S. producers reported that domestic aluminum extrusions were always interchangeable from each subject country. Importer responses were more mixed with most firms reporting that U.S.-product was always, usually, or sometimes, interchangeable with product from each subject country.

**Table II-9**  
**Aluminum extrusions: 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
U.S. vs. China	22	3	1	0
U.S. vs. Colombia	20	2	0	0
U.S. vs. Dominican Republic	20	2	0	0
U.S. vs. Ecuador	20	1	0	0
U.S. vs. India	21	3	1	0
U.S. vs. Indonesia	21	3	0	0
U.S. vs. Italy	22	2	0	0
U.S. vs. Malaysia	22	3	0	0
U.S. vs. Mexico	21	4	1	0
U.S. vs. South Korea	22	2	1	0
U.S. vs. Taiwan	21	1	0	0
U.S. vs. Thailand	21	1	0	0
U.S. vs. Turkey	20	4	0	0
U.S. vs. United Arab Emirates	20	1	0	0
U.S. vs. Vietnam	21	3	1	0
U.S. vs. Other	21	2	0	0

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

**Table II-10**  
**Aluminum extrusions: 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
U.S. vs. China	10	4	10	2
U.S. vs. Colombia	7	3	1	0
U.S. vs. Dominican Republic	9	3	3	0
U.S. vs. Ecuador	10	4	2	1
U.S. vs. India	10	4	7	0
U.S. vs. Indonesia	10	4	4	0
U.S. vs. Italy	8	2	5	0
U.S. vs. Malaysia	8	2	5	0
U.S. vs. Mexico	14	7	8	1
U.S. vs. South Korea	8	4	4	1
U.S. vs. Taiwan	9	3	4	1
U.S. vs. Thailand	7	3	4	1
U.S. vs. Turkey	9	4	6	0
U.S. vs. United Arab Emirates	9	3	3	0
U.S. vs. Vietnam	9	5	3	0
U.S. vs. Other	7	3	4	1

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

In addition, U.S. producers and importers were asked to assess how often differences other than price were significant in sales of aluminum extrusions from the United States, subject, or nonsubject sources. As seen in tables II-11 to II-12, most U.S. producers reported that there is sometimes or never a difference other than price between aluminum extrusions from the United States, subject countries and nonsubject countries. Importers' responses were more mixed.

**Table II-11****Aluminum extrusions: 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**

<b>Country pair</b>	<b>Always</b>	<b>Frequently</b>	<b>Sometimes</b>	<b>Never</b>
U.S. vs. China	2	1	10	13
U.S. vs. Colombia	0	0	8	14
U.S. vs. Dominican Republic	0	0	8	14
U.S. vs. Ecuador	0	0	7	14
U.S. vs. India	0	3	9	13
U.S. vs. Indonesia	0	2	9	13
U.S. vs. Italy	0	1	10	13
U.S. vs. Malaysia	0	2	10	13
U.S. vs. Mexico	2	2	10	13
U.S. vs. South Korea	0	1	10	14
U.S. vs. Taiwan	0	1	8	13
U.S. vs. Thailand	0	1	8	13
U.S. vs. Turkey	0	1	10	13
U.S. vs. United Arab Emirates	0	0	8	13
U.S. vs. Vietnam	0	1	10	13
U.S. vs. Other	0	0	11	10

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

**Table II-12****Aluminum extrusions: Count of importers reporting the significance of differences between product produced in the United States and in other countries, by country pair**

<b>Country pair</b>	<b>Always</b>	<b>Frequently</b>	<b>Sometimes</b>	<b>Never</b>
U.S. vs. China	7	2	6	6
U.S. vs. Colombia	3	1	2	6
U.S. vs. Dominican Republic	5	0	3	5
U.S. vs. Ecuador	5	1	4	5
U.S. vs. India	5	3	6	6
U.S. vs. Indonesia	4	2	5	5
U.S. vs. Italy	3	2	2	7
U.S. vs. Malaysia	1	2	4	6
U.S. vs. Mexico	6	5	8	7
U.S. vs. South Korea	3	0	7	6
U.S. vs. Taiwan	3	3	2	7
U.S. vs. Thailand	2	2	4	6
U.S. vs. Turkey	2	3	6	5
U.S. vs. United Arab Emirates	2	0	5	6
U.S. vs. Vietnam	5	2	5	5
U.S. vs. Other	5	1	6	5

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





## **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 was presented in Part I of this report and information on the volume and pricing of imports of the subject merchandise is presented in Part IV and Part V. Information on the other factors specified is presented in this section and/or Part VI and (except as noted) is based on the questionnaire responses of 29 firms that accounted for the majority of U.S. production of aluminum extrusions during 2022.<sup>1</sup>

### **U.S. producers**

The Commission issued a U.S. producer questionnaire to 62 firms based on information contained in the petition. Twenty-nine firms provided usable data on their operations.<sup>2</sup> Staff believes that these responses represent the majority of U.S. production of aluminum extrusions in 2022.

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

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<sup>1</sup> The petitioners used shipments as a proxy for production in discussing industry support for the petition. Petition, pp. 2-6. Petitioners estimate that total U.S. shipments of aluminum extrusions in 2022 was 1,900,303 short tons. Petition, p. 6. U.S. producers' U.S. shipment data totaled 1,278,489 short tons in 2022, or 67.3 percent of petitioners' total U.S. shipments figure.

<sup>2</sup> Data for U.S. producers \*\*\* are present in this section of the staff report, but not in Part VI (see p. VI-1 for more information). U.S. producer \*\*\*.

**Table III-1****Aluminum extrusions: U.S. producers, their positions on the petition, production locations, and shares of reported production, 2022**

<b>Firm</b>	<b>Position on petition</b>	<b>Production location(s)</b>	<b>Share of production</b>
Alexandria Industries	Petitioner	Alexandria, MN Indianapolis, IN	***
Almag	***	Pennsauken Township, NJ Florence, AL	***
Aluminios de Puerto Rico	***	Humacao, PR	***
APEL Extrusions	Petitioner	Coburg, OR Phoenix, AZ	***
Astro Shapes	***	Struthers, OH Boardman, OH Youngstown, OH	***
Bonnell	Petitioner	Newnan, GA Carthage, TN Niles, MI Clearfield, UT Elkhart, IN	***
Brazeway	Petitioner	Hopkinsville, KY Shelbyville, IN	***
Custom Aluminum	Petitioner	Genoa, IL South Elgin, IL	***
Dajcor	***	Chavies, KY	***
Elixir	***	Douglas, GA	***
Erbsloeh	***	Pell City, AL Annville, KY	***
Extrudex	Petitioner	North Jackson, OH	***
Hydro Extrusion	***	Cressona, PA Yankton, SD Saint Augustine, FL Phoenix, AZ North Liberty, IN	***
Hydro Precision	***	Rockledge, FL	***
International Extrusions	Petitioner	Garden City, MI Livonia, MI	***
Jordan	Petitioner	Memphis, TN	***
Keymark	***	Fonda, NY Lakeland, FL	***
M-D Building	Petitioner	Oklahoma City, OK Louisville, KY Hayti, MO	***
Merit	Petitioner	Corona CA	***
Mi Metals	Petitioner	Oldsmar, FL Millen, GA Smyrna, TN Presscot Valley, AZ	***
Momentum	***	Franklin, NH	***

Firm	Position on petition	Production location(s)	Share of production
PC Extrusions	***	Rome, GA	***
Penn	***	Murphysboro, IL Harlingen, TX	***
Pennex	Petitioner	Leetonia, OH Wellsville, PA York, PA	***
Pries	***	Independence, IA	***
Sierra Aluminum	***	Jurupa Valley, CA Fontana, CA	***
Tower Extrusions	Petitioner	Olney, TX Wylie, TX	***
Western Extrusions	Petitioner	Carrollton, TX Pennsauken, NJ	***
Wolverine	***	Decatur, AL	***
All firms	Various	Various	***

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

Table III-2 presents information on U.S. producers' ownership, related and/or affiliated firms. As indicated in table III-2, five U.S. producers are related to foreign producers of the subject merchandise and five U.S. producers are related to U.S. importers of the subject merchandise. In addition, as discussed in greater detail below, five U.S. producers directly import the subject merchandise and one U.S. producer purchases the subject merchandise from U.S. importers.

**Table III-2**  
**Aluminum extrusions: U.S. producers' ownership, related and/or affiliated firms**

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

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

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**  
**Aluminum Extrusions: Important industry events since January 1, 2020**

Item	Firm	Event
Price increase	Bonnell	In October 2020, petitioning firm Bonnell announced a price increase of \$0.035 per pound on aluminum extrusions, and an additional 5 percent increase on fabrications and finishing services. The announcement cites continuous cost pressures in freight, labor, and supplies.
Price	Western Extrusions	In 2021, Western Extrusions invested \$55 million into building a new cast house at their Carrollton, Texas facility.
Plant opening	APEL Extrusions	In April 2021, petitioning firm APEL announced that it would be moving its headquarters and building a new extrusion facility in Phoenix, Arizona.
Plant expansion	Alexandria Industries	In August 2021, petitioning firm Alexandria Industries completed the installation of a new extrusion press line at its facility in Alexandria, Minnesota.
Plant opening	Aluminum Insights	In November 2021, Aluminum Insights announced the construction of a new aluminum extrusions facility in Syracuse, Indiana. The \$17.5 million facility was set to open in April 2022.
Plant opening	Bunting	In April 2022, Bunting Inc. announced it would be joining the aluminum extrusions industry and investing \$17 million in a new aluminum extrusions facility in New Castle, Pennsylvania.
Plant reopening	Western Extrusions	In June 2022, Western announced the lease and reopening of a previously idled extrusions facility back online in Pennsauken, New Jersey. The facility has a cast house and two extrusion presses, one of which is among the largest in the United States. The reopening brought back 100 jobs. This reopening, along with the investments made in Carrollton (described above) have led to an overall company increase in capacity of nearly 15 percent over the last 18 months.
Reduction in production	Custom Aluminum	According to testimony from the preliminary conference, over the past year, Custom Aluminum has reduced shifts on its extrusion press lines from 18 shifts to 9 shift and stopped running one of its six presses completely. The company also noted two rounds of layoffs over the past year.
Layoffs	Western Extrusions	During the preliminary conference, Western stated that it laid off 45 workers in May 2023.
Reduction in production and layoffs	Brazeway	During the preliminary conference, Brazeway noted that they have recently idled one extrusion press, reduced shifts, and laid off 13 percent of their workforce.
Reduction in production and layoffs	Bonnell	During the preliminary conference, Bonnell testified that their production volume had fallen to about 60 percent of their capacity recently, and laid off 500 employees in the last year.

Source: Bloomberg, "Bonnell Aluminum Announces Price Increase on Aluminum Extrusions, Fabrications, and Finishing Services," October 8, 2020, <https://www.bloomberg.com/press-releases/2019-10-08/bonnell-aluminum-announces-price-increase-on-aluminum-extrusions-fabrications-and-finishing-services>; APEL Extrusions, "Calgary-based APEL Extrusions Relocating Headquarters to Arizona," April 1, 2022, <https://apelextrusions.com/wp-content/uploads/2021/04/APEL-Extrusions-Expansion-Announcement.pdf>; A Light Metal Age, "Alexandria's New Extrusion Press Line," August 16, 2021, <https://www.lightmetallage.com/news/industry-news/extrusion/alexandrias-new-aluminum-extrusion-press->

[line/](#); Greater Fort Wayne Business Weekly, “Start-up Aluminum Company Investing \$17.5M in New Plant, Equipment,” November 9, 2021, [https://www.fwbusiness.com/fwbusiness/article\\_a4ee4114-fa78-5d6b-aa34-d490c8642cf8.html](https://www.fwbusiness.com/fwbusiness/article_a4ee4114-fa78-5d6b-aa34-d490c8642cf8.html); The Philadelphia Inquirer, “After International Tax Scandal, South Jersey Manufacturing Complex is Back from the Dead,” June 22, 2022, <https://www.inquirer.com/business/aluminum-shapes-pennsauken-manufacturing-philly-20220622.html>; Thomasnet, “Pennsylvania Manufacturer Announces \$17 Million Aluminum Extrusion Mill,” April 13, 2022, <https://www.thomasnet.com/insights/pennsylvania-manufacturer-announces-17-million-aluminumextrusion-mill/>, Preliminary Conference transcript, pp. 28-29, 31-33 43, 46.

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of aluminum extrusions since 2020. All U.S. producers indicated in their questionnaire responses that they had experienced at least one change. Table III-4 presents the changes identified by these producers.

**Table III-4**  
**Aluminum extrusions: U.S. producers’ reported changes in operations, since January 1, 2020**

Item	Firm name and narrative response on changes in operations
Plant openings	***
Plant openings	***
Plant openings	***
Plant openings	***
Plant closings	***
Plant closings	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Production curtailments	***

Item	Firm name and narrative response on changes in operations
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***



Item	Firm name and narrative response on changes in operations
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Relocations	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***

Item	Firm name and narrative response on changes in operations
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***

Item	Firm name and narrative response on changes in operations
Expansions	***
Expansions	***
Acquisitions	***
Acquisitions	***
Acquisitions	***
Acquisitions	***
Acquisitions	***
Consolidations	***
Weather-related or force majeure events	***
Weather-related or force majeure events	***
Weather-related or force majeure events	***
Other	***
Other	***

Item	Firm name and narrative response on changes in operations
Other	***
Other	***
Other	***
Other	***
Other	***

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

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

Table III-5 presents U.S. producers’ installed and practical capacity and production on the same equipment. Thirteen firms reported expansions in U.S. production capability, as reported in table III-4.<sup>3</sup> Installed overall capacity increased \*\*\* percent from 2020-22, and was \*\*\* percent higher in January-June (“interim”) 2023 than in interim 2022. Installed overall capacity utilization increased by \*\*\* percentage points from 2020-22, but was \*\*\* percentage points lower in interim 2023 than in interim 2022. Practical overall capacity increased \*\*\* percent from 2020-22, and was \*\*\* percent higher in interim 2023 than in interim 2022. Practical overall capacity utilization increased \*\*\* percentage points from 2020-22, but was \*\*\* percentage points lower in interim 2023 than in interim 2022.<sup>4</sup>

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<sup>3</sup> While \*\*\* also indicated ‘expansions’ as changes in operations, \*\*\*.

<sup>4</sup> As discussed further in the “Alternative Products” section below, \*\*\* reported production on the same machinery was of aluminum extrusions compared to other products. Therefore, practical overall capacity and practical aluminum extrusions capacity are \*\*\*.

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

Capacity and production in short tons; 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 aluminum extrusions	Capacity	1,607,519	1,665,079	1,695,110	844,057	861,422
Practical aluminum extrusions	Production	1,197,050	1,376,980	1,358,188	727,304	619,459
Practical aluminum extrusions	Utilization	74.5	82.7	80.1	86.2	71.9

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

Table III-6 presents U.S. producers' reported narratives regarding practical capacity constraints. "Existing labor force" constraints were the most cited specific constraint (cited by 16 U.S. producers), followed by "production bottlenecks" (cited by four U.S. producers). "Other constraints" were cited by 18 U.S. producers.

**Table III-6**  
**Aluminum extrusions: 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	***
Production bottlenecks	***
Production bottlenecks	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***

Item	Firm name and narrative response on constraints to practical overall capacity
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Supply of material inputs	***
Storage capacity	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***

Item	Firm name and narrative response on constraints to practical overall capacity
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***

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

Table III-7 and figure III-1 present U.S. producers' production, capacity, and capacity utilization. Practical capacity increased 5.4 percent from 2020-22, and was 2.1 percent higher in interim 2023 than in interim 2022. Production increased 15.0 percent from 2020-21 (and was at its peak in 2021) and decreased 1.4 percent from 2021-22, for an overall increase of 13.5 percent from 2020-22. Production however was 14.8 percent lower in interim 2023 than in interim 2022. Accordingly, while capacity utilization was 5.7 percentage points higher from 2020-22 (and also was at its highest during these years in 2021), it was 14.3 percentage points lower in interim 2023 than in interim 2022. The majority of firms reported increases in capacity (15 firms) and production (23 firms) from 2020-22. However, between interim 2022 and interim 2023, an equal number of firms reported increased capacity or decreased capacity (nine firms each, with the remainder having no change in capacity).<sup>5</sup> Between the same periods, only four firms reported increased production, while twenty-five firms reported decreases in production.<sup>6</sup>

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<sup>5</sup> Nearly all firms reported higher capacity utilization rates in interim 2022 than in full year 2022.

<sup>6</sup> The members of the petitioning coalition report that they can currently produce \*\*\* of the 88 products specifically mentioned in the scope as being in-scope aluminum extrusions. They further assert that for the remaining \*\*\* products, which include \*\*\*, the petitioners could produce those products with no additional investment and with very little or no lead time. Petitioners' postconference brief, exh. 1, pp. 11-12.



**Table III-7**  
**Aluminum extrusions: U.S. producers' output, by firm and period**  
**Practical capacity**

Capacity in short tons

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
Alexandria Industries	***	***	***	***	***
Almag	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Erbsloeh	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
<b>All firms</b>	<b>1,607,519</b>	<b>1,665,079</b>	<b>1,695,110</b>	<b>844,057</b>	<b>861,422</b>

Table continued.

**Table III-7 Continued**  
**Aluminum extrusions: U.S. producers' output, by firm and period**  
**Production**

Production in short tons

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
Alexandria Industries	***	***	***	***	***
Almag	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Erbsloeh	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
All firms	1,197,050	1,376,980	1,358,188	727,304	619,459

Table continued.

**Table III-7 Continued**  
**Aluminum extrusions: 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>
Alexandria Industries	***	***	***	***	***
Almag	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Erbsloeh	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
All firms	74.5	82.7	80.1	86.2	71.9

Table continued.

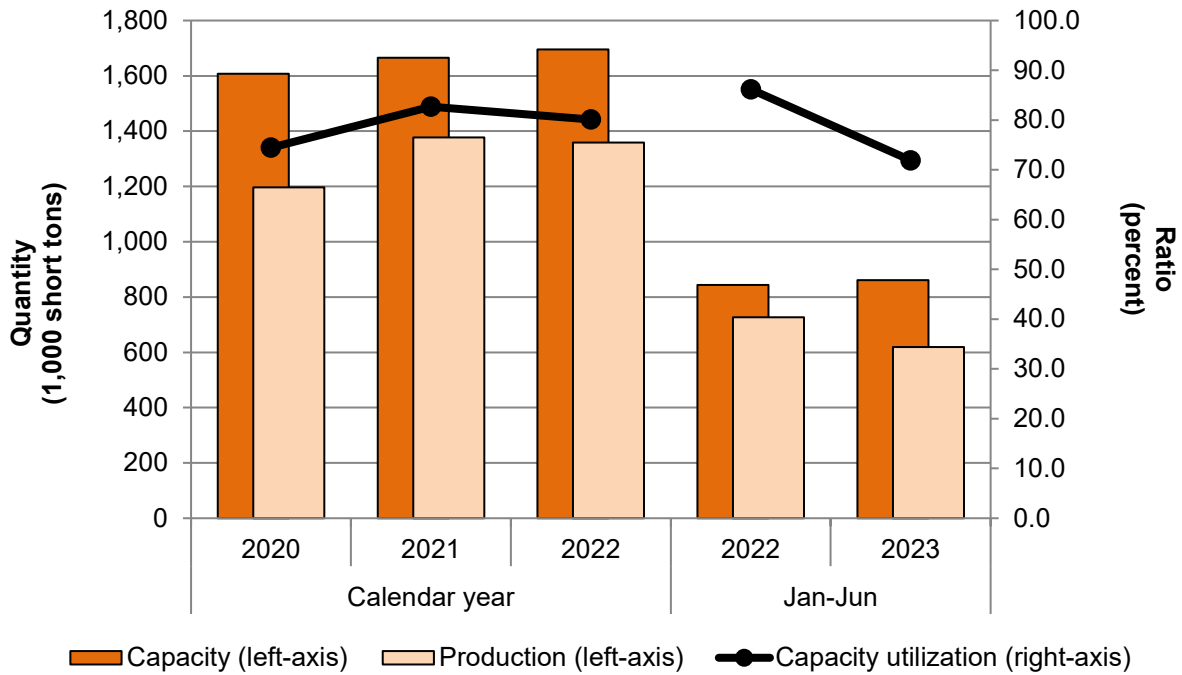
**Table III-7 Continued**  
**Aluminum extrusions: U.S. producers' output, by firm and period**  
**Share of production**

Share in percent

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
Alexandria Industries	***	***	***	***	***
Almag	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Erbsloeh	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0

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

**Figure III-1**  
**Aluminum extrusions: U.S. producers' output, by period**



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

### Alternative products

As shown in table III-8, nearly all products produced on the same equipment by U.S. producers was of aluminum extrusions. \*\*\* reported production of other products than aluminum extrusions on the same equipment. These products include “\*\*\*.”

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

Quantity in short tons; ratio and share in percent

Product type	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Aluminum extrusions	Quantity	1,197,050	1,376,980	1,358,188	727,304	619,459
Other products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
Aluminum extrusions	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
All products	Share	***	***	***	***	***

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

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

Table III-9 presents U.S. producers' U.S. shipments, export shipments, and total shipments. U.S. shipments increased 11.5 percent by quantity from 2020-22, but were 14.4 percent lower in interim 2023 than in interim 2022. The unit value of U.S. shipments increased 53.2 percent from 2020-22, but was 9.5 percent lower in interim 2023 than in interim 2022. Export shipments increased \*\*\* percent from 2020-22, and were \*\*\* percent higher in interim 2023 than in interim 2022. The unit value of U.S. producers' export shipments increased \*\*\* percent from 2020-22, but was \*\*\* percent lower in interim 2023 than in interim 2022.<sup>7</sup> U.S. shipments and export shipments by quantity were at their highest levels in 2021, while they were at their highest levels by value in 2022.

Most U.S. shipments were of commercial shipments; in no period was the share of U.S. shipments accounted for by commercial shipments lower than \*\*\* percent.

**Table III-9**  
**Aluminum extrusions: U.S. producers' shipments, by destination and period**

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short tons; shares in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. shipments	Quantity	1,146,677	1,292,717	1,278,489	681,375	583,558
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	4,672,169	6,428,153	7,978,765	4,390,875	3,401,641
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	4,075	4,973	6,241	6,444	5,829
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
U.S. shipments	Share of quantity	***	***	***	***	***
Export shipments	Share of quantity	***	***	***	***	***
Total shipments	Share of quantity	***	***	***	***	***
U.S. shipments	Share of value	***	***	***	***	***
Export shipments	Share of value	***	***	***	***	***
Total shipments	Share of value	***	***	***	***	***

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

<sup>7</sup> Export shipments comprised no more than \*\*\* percent of total shipments from 2020-22, and comprised \*\*\* percent of total shipments in interim 2023. Ten U.S. producers exported aluminum extrusions throughout the period (\*\*\*), with \*\*\* being the most reported destinations.

## U.S. producers' inventories

Table III-10 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments. U.S. producers' inventories increased 39.3 percent from 2020-22, but were 6.4 percent lower between interim 2023 and interim 2022. Inventories as a ratio to U.S. production increased 0.8 percentage points from 2020-22, and were 0.4 percentage points higher in interim 2023 than in interim 2022. Inventories as a ratio to total shipments increased \*\*\* percentage points from 2020-22, and were \*\*\* percentage points higher in interim 2023 than in interim 2022.

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

Quantity in short tons; ratio in percent

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
End-of-period inventory quantity	43,889	51,749	61,142	60,838	56,937
Inventory ratio to U.S. production	3.7	3.8	4.5	4.2	4.6
Inventory ratio to U.S. shipments	3.8	4.0	4.8	4.5	4.9
Inventory ratio to total shipments	***	***	***	***	***

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

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

U.S. producers' imports of aluminum extrusions are presented in table III-11 through III-15. Four U.S. producers (\*\*\*) reported importing directly or alongside an affiliate, while another (\*\*\*) is affiliated with \*\*\*.<sup>8</sup>

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

**Table III-11****Aluminum extrusions: \*\*\*'s U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity in short tons; 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 ***	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***

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

**Table III-12****Aluminum extrusions: \*\*\*'s U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity in short tons; ratio in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. production	Quantity	***	***	***	***	***
Imports from *** by affiliated U.S. importer ***	Quantity	***	***	***	***	***
Imports from *** by ***	Quantity	***	***	***	***	***
Imports from *** by all affiliated importers	Quantity	***	***	***	***	***
Imports from *** by affiliated U.S. importer *** to U.S. production	Ratio	***	***	***	***	***
Imports from *** by *** to U.S. production	Ratio	***	***	***	***	***
Imports from *** by all affiliated importers to U.S. production	Ratio	***	***	***	***	***

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



**Table III-13****Aluminum extrusions: \*\*\*'s U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity in short tons; 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.

**Table III-14****Aluminum extrusions: \*\*\*'s U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity in short tons; 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.

**Table III-15****Aluminum extrusions: \*\*\*\*'s U.S. production, U.S. imports from \*\*\*, and ratio of imports to production, by period**

Quantity in short tons; 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 ***	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires. 6.

U.S. producers' reasons for importing aluminum extrusions are presented in table III-16.

**Table III-16**  
**Aluminum extrusions: U.S. producers' reasons for importing**

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

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

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

U.S. producers' purchases of imports from subject sources, and reasons for purchasing, are presented in tables III-17 and III-18 respectively. \*\*\*.

**Table III-17****Aluminum extrusions: \*\*\*'s U.S. production, purchases of subject U.S. imports, and ratio of purchases to production, by period**

Quantity in short tons; ratio in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. production	Quantity	***	***	***	***	***
U.S. purchases of imports from ***	Quantity	***	***	***	***	***
U.S. purchases of imports from ***	Quantity	***	***	***	***	***
U.S. purchases of imports from ***	Quantity	***	***	***	***	***
Producer's purchases of imports from *** to U.S. production	Ratio	***	***	***	***	***
Producer's purchases of imports from *** to U.S. production	Ratio	***	***	***	***	***
Producer's purchases of imports from *** 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-18****Aluminum extrusions: U.S. producers' reasons for purchasing**

Item	Narrative response on reasons for purchasing
***'s reason for purchasing	***

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

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

Table III-19 shows U.S. producers' employment-related data. While most metrics showed increases from 2020-22, nearly all declined between interim 2022 and interim 2023. PRWs increased 14.5 percent from 2020-22, but were 7.2 percent lower in interim 2023 than in interim 2022. Hours worked increased 13.4 percent from 2020-22, but were 2.4 percent lower in interim 2023 than in interim 2022. Wages paid and hourly wages increased 28.3 percent and 13.2 percent, respectively from 2020-22, but were 3.3 percent and 0.9 percent lower, respectively, in interim 2023 than in interim 2022. Productivity was mostly unchanged from 2020-22, but was 12.7 percent lower in interim 2023 than in interim 2022. Unit labor costs

increased 13.1 percent from 2020-22, and were 13.6 percent higher in interim 2023 than in interim 2022.

**Table III-19**  
**Aluminum extrusions: U.S. producers' employment related information, by period**

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Production and related workers (PRWs) (number)	13,252	14,293	15,168	15,469	14,359
Total hours worked (1,000 hours)	28,072	30,458	31,836	20,932	20,427
Hours worked per PRW (hours)	2,118	2,131	2,099	1,353	1,423
Wages paid (\$1,000)	790,693	927,426	1,014,720	512,477	495,651
Hourly wages (dollars per hour)	\$28.17	\$30.45	\$31.87	\$24.48	\$24.26
Productivity (short tons per 1,000 hours)	42.6	45.2	42.7	34.7	30.3
Unit labor costs (dollars per short ton)	\$661	\$674	\$747	\$705	\$800

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 313 firms believed to be importers of subject aluminum extrusions, as well as to all U.S. producers of aluminum extrusions.<sup>1</sup> Usable questionnaire responses were received from 69 companies, representing the following percentages of U.S. imports in 2022 under HTS statistical reporting numbers 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080, as adjusted:<sup>2 3</sup>

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<sup>1</sup> The Commission issued questionnaires to certain firms identified in the petition, along with several firms identified through staff research and a review of data from third-party sources. The petitions identified several thousand total firms as potential importers; for administrative efficiency, staff identified approximately 20 top firms from each subject source, as well as nonsubject sources, to be issued questionnaires.

<sup>2</sup> These are the “primary” HTS numbers identified in the scope as numbers under which the subject merchandise is provided for. U.S. import data are based on U.S. import statistics of the U.S. Department of Commerce Census Bureau using these HTS statistical reporting numbers. Further adjustments to certain tables in this report may include using data submitted in response to Commission questionnaires to: (1) report subject vs. nonsubject data for China; (2) to add in reported in-scope imports entered under other HTS statistical reporting numbers; and (3) to remove products other than aluminum extrusions (i.e., out-of-scope merchandise). Additionally, certain data compiled from proprietary Census-edited, Customs records using the same statistical reporting numbers listed above were used in certain tables to remove imports reported by firms that certified “no” for their questionnaire response that they do not import aluminum extrusions. For detailed information on the adjustments for each table, see specific table source notes.

Coverage figures on p. IV-2 are a comparison of import data provided in questionnaire responses to import quantities presented in table IV-2, which present official import statistics adjusted using data submitted in Commission questionnaires to report China subject vs. nonsubject data and to add in reported in-scope imports under other (i.e., non-primary) HTS statistical reporting numbers.

<sup>3</sup> Questionnaire data may be over-inclusive of data not specifically for aluminum extrusions. Several firms reported difficulties with isolating the weight and value of just aluminum extrusions from products they imported which included components beyond in-scope aluminum extrusions.

For example, Polaris noted that, “\*\*\*.” Polaris’ U.S. Importers’ Questionnaire Response. Home Depot noted that, “\*\*\*.” Email from \*\*\* to Commission staff, November 2, 2023. Johnson Controls reported that,

(continued...)

- China, subject: \*\*\* percent
- Colombia: \*\*\* percent
- Dominican Republic: \*\*\* percent
- Ecuador: \*\*\* percent
- India: \*\*\* percent
- Indonesia: \*\*\* percent
- Italy: \*\*\* percent
- Malaysia: \*\*\* percent
- Mexico: \*\*\* percent
- South Korea: \*\*\* percent
- Taiwan: \*\*\* percent
- Thailand: \*\*\* percent
- Turkey: \*\*\* percent
- United Arab Emirates: \*\*\* percent
- Vietnam: \*\*\* percent
- Subject sources: \*\*\* percent
- Nonsubject sources: \*\*\* percent
- All import sources: \*\*\* percent

Table IV-1 lists all responding U.S. importers of aluminum extrusions from the subject countries and other sources, their locations, and their shares of U.S. imports, in 2022.

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(...continued)

“\*\*\*.” Johnson Controls’ U.S. Importers’ Questionnaire Response. Importer \*\*\* is not included in the dataset for this report, however it also noted that, “\*\*\*.” \*\*\* U.S. Importers’ Questionnaire Response.

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

Share in percent

Firm	Head quarters	China, subject	Colombia	Dominican Republic	Ecuador	India	Indonesia	Italy	Malaysia
ABC Aluminum	Tijuana, BC	***	***	***	***	***	***	***	***
Adams Thermal	Canton, SD	***	***	***	***	***	***	***	***
Alfrex	Buford, GA	***	***	***	***	***	***	***	***
AlphaPro	Riverview, FL	***	***	***	***	***	***	***	***
Alu	Edison, NJ	***	***	***	***	***	***	***	***
Alumina Distribution	Hialeah Gardens, FL, FL	***	***	***	***	***	***	***	***
Aluwest	Sabana Seca, PR	***	***	***	***	***	***	***	***
Alwood	Richardson, TX	***	***	***	***	***	***	***	***
Ames	Orlando, FL	***	***	***	***	***	***	***	***
APEL	Coburg, OR	***	***	***	***	***	***	***	***
Barrette	Middlesburgh Heights, OH	***	***	***	***	***	***	***	***
Bracalente	Trumbauersville, PA	***	***	***	***	***	***	***	***
Century Metals	Miami Gardens, FL	***	***	***	***	***	***	***	***
Coast Aluminum	Santa Fe Springs, CA	***	***	***	***	***	***	***	***
Constellium	Plymouth, MI	***	***	***	***	***	***	***	***
Construction Specialties	Lebanon, NJ	***	***	***	***	***	***	***	***
Containers Direct	Lighthouse Point, FL	***	***	***	***	***	***	***	***
Cuprum	San Nicolas De Los Garza, NL	***	***	***	***	***	***	***	***
Custom Aluminum	South Elgin, IL	***	***	***	***	***	***	***	***
DSS	Houston, TX	***	***	***	***	***	***	***	***
ERA Global	Elkhart, IN	***	***	***	***	***	***	***	***
ERD	Westfield, MA	***	***	***	***	***	***	***	***
Eural	Chicago, IL	***	***	***	***	***	***	***	***
Extrudex	North Jackson, OH	***	***	***	***	***	***	***	***
Extrum	Choloma, HN	***	***	***	***	***	***	***	***

Table continued.

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

Share in percent

Firm	Head quarters	China, subject	Colombia	Dominican Republic	Ecuador	India	Indonesia	Italy	Malaysia
First Solar	Tempe, AZ	***	***	***	***	***	***	***	***
Ford Atlantic	Pine Brook, NJ	***	***	***	***	***	***	***	***
Fox Factory	Gainesville, GA	***	***	***	***	***	***	***	***
Hanon Alabama	Shorter, AL	***	***	***	***	***	***	***	***
Hanon USA	Novi, MI	***	***	***	***	***	***	***	***
Hanwha	Dalton, GA	***	***	***	***	***	***	***	***
Home Depot	Atlanta, GA	***	***	***	***	***	***	***	***
Hunter Douglas	Cerritos, CA	***	***	***	***	***	***	***	***
Hussmann	Bridgeton, MO	***	***	***	***	***	***	***	***
Hydro Extrusion	Rosemont, IL	***	***	***	***	***	***	***	***
Hydro Precision Monterrey	Rockledge, FL	***	***	***	***	***	***	***	***
Hydro Precision USA	Rockledge, FL	***	***	***	***	***	***	***	***
Icon Best	Pompano Beach, FL	***	***	***	***	***	***	***	***
Industrias Feliciano	Aguadilla, PR	***	***	***	***	***	***	***	***
JL Trading	Bayamon, PR	***	***	***	***	***	***	***	***
Johnson Controls	Glendale, WI	***	***	***	***	***	***	***	***
Kingtom	Santo Domingo, DR	***	***	***	***	***	***	***	***
LCI	Elkhart, IN	***	***	***	***	***	***	***	***
LK Aluminum	Medley, FL	***	***	***	***	***	***	***	***
Lowes	Mooreville, NC	***	***	***	***	***	***	***	***
Mahle Behr	Troy, MI	***	***	***	***	***	***	***	***
Marvel	Ontario, CA	***	***	***	***	***	***	***	***
MC Aluminum	Weston, FL	***	***	***	***	***	***	***	***
M-D Building	Oklahoma City, OK	***	***	***	***	***	***	***	***
Modine	Racine, WI	***	***	***	***	***	***	***	***
New Hudson	Linwood, PA	***	***	***	***	***	***	***	***
Pennex	St. Louis, MO	***	***	***	***	***	***	***	***

Table continued.



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

Share in percent

Firm	Head quarters	China, subject	Colombia	Dominican Republic	Ecuador	India	Indonesia	Italy	Malaysia
Perfiles	Sabana Seca, PR	***	***	***	***	***	***	***	***
PGT	North Venice, FL	***	***	***	***	***	***	***	***
Polaris	Medina, MN	***	***	***	***	***	***	***	***
Press Metal	Cumming, GA	***	***	***	***	***	***	***	***
Productive Tool	Dallas, NC	***	***	***	***	***	***	***	***
Puertas y Ventanas	Quebradillas, PR	***	***	***	***	***	***	***	***
Samuel	Oakville, ON	***	***	***	***	***	***	***	***
Scope Metals	Bensalem, PA	***	***	***	***	***	***	***	***
Sinobec	Pompano Beach, FL	***	***	***	***	***	***	***	***
Sunrun	San Francisco, CA	***	***	***	***	***	***	***	***
Ta Chen	Long Beach, CA	***	***	***	***	***	***	***	***
Tesla	Austin, TX	***	***	***	***	***	***	***	***
TSA Metals	Temple City, CA	***	***	***	***	***	***	***	***
Turnils	Buford, GA	***	***	***	***	***	***	***	***
U.S. Futaba	Santa Ana, CA	***	***	***	***	***	***	***	***
Unirac	Albuquerque, NM	***	***	***	***	***	***	***	***
ZMC	Woodbridge, ON	***	***	***	***	***	***	***	***
All firms	Various	***	***	***	***	***	***	***	***

Table continued.

**Table IV-1 Continued**

**Aluminum extrusions: U.S. importers, their headquarters, and share of imports within each source, 2022**

Share in percent

Firm	Headquarters	Mexico	South Korea	Taiwan	Thailand	Turkey	United Arab Emirates	Vietnam
ABC Aluminum	Tijuana, BC	***	***	***	***	***	***	***
Adams Thermal	Canton, SD	***	***	***	***	***	***	***
Alfrex	Buford, GA	***	***	***	***	***	***	***
AlphaPro	Riverview, FL	***	***	***	***	***	***	***
Alu	Edison, NJ	***	***	***	***	***	***	***
Alumina Distribution	Hialeah Gardens, FI, FL	***	***	***	***	***	***	***
Aluwest	Sabana Seca, PR	***	***	***	***	***	***	***
Alwood	Richardson, TX	***	***	***	***	***	***	***
Ames	Orlando, FL	***	***	***	***	***	***	***
APEL	Coburg, OR	***	***	***	***	***	***	***
Barrette	Middlesburgh Heights, OH	***	***	***	***	***	***	***
Bracalente	Trumbauersville, PA	***	***	***	***	***	***	***
Century Metals	Miami Gardens, FL	***	***	***	***	***	***	***
Coast Aluminum	Santa Fe Springs, CA	***	***	***	***	***	***	***
Constellium	Plymouth, MI	***	***	***	***	***	***	***
Construction Specialties	Lebanon, NJ	***	***	***	***	***	***	***
Containers Direct	Lighthouse Point, FL	***	***	***	***	***	***	***
Cuprum	San Nicolas De Los Garza, NL	***	***	***	***	***	***	***
Custom Aluminum	South Elgin, IL	***	***	***	***	***	***	***
DSS	Houston, TX	***	***	***	***	***	***	***
ERA Global	Elkhart, IN	***	***	***	***	***	***	***
ERD	Westfield, MA	***	***	***	***	***	***	***
Eural	Chicago, IL	***	***	***	***	***	***	***
Extrudex	North Jackson, OH	***	***	***	***	***	***	***
Extrum	Choloma, HN	***	***	***	***	***	***	***
First Solar	Tempe, AZ	***	***	***	***	***	***	***
Ford Atlantic	Pine Brook, NJ	***	***	***	***	***	***	***

Table continued.

**Table IV-1 Continued**

**Aluminum extrusions: U.S. importers, their headquarters, and share of imports within each source, 2022**

Share in percent

Firm	Headquarters	Mexico	South Korea	Taiwan	Thailand	Turkey	United Arab Emirates	Vietnam
Fox Factory	Gainesville, GA	***	***	***	***	***	***	***
Hanon Alabama	Shorter, AL	***	***	***	***	***	***	***
Hanon USA	Novi, MI	***	***	***	***	***	***	***
Hanwha	Dalton, GA	***	***	***	***	***	***	***
Home Depot	Atlanta, GA	***	***	***	***	***	***	***
Hunter Douglas	Cerritos, CA	***	***	***	***	***	***	***
Hussmann	Bridgeton, MO	***	***	***	***	***	***	***
Hydro Extrusion	Rosemont, IL	***	***	***	***	***	***	***
Hydro Precision Monterrey	Rockledge, FL	***	***	***	***	***	***	***
Hydro Precision USA	Rockledge, FL	***	***	***	***	***	***	***
Icon Best	Pompano Beach, FL	***	***	***	***	***	***	***
Industrias Feliciano	Aguadilla, PR	***	***	***	***	***	***	***
JL Trading	Bayamon, PR	***	***	***	***	***	***	***
Johnson Controls	Glendale, WI	***	***	***	***	***	***	***
Kingtom	Santo Domingo, DR	***	***	***	***	***	***	***
LCI	Elkhart, IN	***	***	***	***	***	***	***
LK Aluminum	Medley, FL	***	***	***	***	***	***	***
Lowes	Mooresville, NC	***	***	***	***	***	***	***
Mahle Behr	Troy, MI	***	***	***	***	***	***	***
Marvel	Ontario, CA	***	***	***	***	***	***	***
MC Aluminum	Weston, FL	***	***	***	***	***	***	***
M-D Building	Oklahoma City, OK	***	***	***	***	***	***	***
Modine	Racine, WI	***	***	***	***	***	***	***
New Hudson	Linwood, PA	***	***	***	***	***	***	***
Pennex	St. Louis, MO	***	***	***	***	***	***	***
Perfiles	Sabana Seca, PR	***	***	***	***	***	***	***
PGT	North Venice, FL	***	***	***	***	***	***	***
Polaris	Medina, MN	***	***	***	***	***	***	***
Press Metal	Cumming, GA	***	***	***	***	***	***	***

Table continued.

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

Share in percent

Firm	Headquarters	Mexico	South Korea	Taiwan	Thailand	Turkey	United Arab Emirates	Vietnam
Productive Tool	Dallas, NC	***	***	***	***	***	***	***
Puertas y Ventanas	Quebradillas, PR	***	***	***	***	***	***	***
Samuel	Oakville, ON	***	***	***	***	***	***	***
Scope Metals	Bensalem, PA	***	***	***	***	***	***	***
Sinobec	Pompano Beach, FL	***	***	***	***	***	***	***
Sunrun	San Francisco, CA	***	***	***	***	***	***	***
Ta Chen	Long Beach, CA	***	***	***	***	***	***	***
Tesla	Austin, TX	***	***	***	***	***	***	***
TSA Metals	Temple City, CA	***	***	***	***	***	***	***
Turnils	Buford, GA	***	***	***	***	***	***	***
U.S. Futaba	Santa Ana, CA	***	***	***	***	***	***	***
Unirac	Albuquerque, NM	***	***	***	***	***	***	***
ZMC	Woodbridge, ON	***	***	***	***	***	***	***
All firms	Various	***	***	***	***	***	***	***

Table continued.

**Table IV-1 Continued**

**Aluminum extrusions: U.S. importers, their headquarters, and share of imports within each source, 2022**

Share in percent

<b>Firm</b>	<b>Headquarters</b>	<b>Subject sources</b>	<b>China, nonsubject</b>	<b>All other sources</b>	<b>Nonsubject sources</b>	<b>All import sources</b>
ABC Aluminum	Tijuana, BC	***	***	***	***	***
Adams Thermal	Canton, SD	***	***	***	***	***
Alfrex	Buford, GA	***	***	***	***	***
AlphaPro	Riverview, FL	***	***	***	***	***
Alu	Edison, NJ	***	***	***	***	***
Alumina Distribution	Hialeah Gardens, Fl, FL	***	***	***	***	***
Aluwest	Sabana Seca, PR	***	***	***	***	***
Alwood	Richardson, TX	***	***	***	***	***
Ames	Orlando, FL	***	***	***	***	***
APEL	Coburg, OR	***	***	***	***	***
Barrette	Middlesburgh Heights, OH	***	***	***	***	***
Bracalente	Trumbauersville, PA	***	***	***	***	***
Century Metals	Miami Gardens, FL	***	***	***	***	***
Coast Aluminum	Santa Fe Springs, CA	***	***	***	***	***
Constellium	Plymouth, MI	***	***	***	***	***
Construction Specialties	Lebanon, NJ	***	***	***	***	***
Containers Direct	Lighthouse Point, FL	***	***	***	***	***
Cuprum	San Nicolas De Los Garza, NL	***	***	***	***	***
Custom Aluminum	South Elgin, IL	***	***	***	***	***
DSS	Houston, TX	***	***	***	***	***
ERA Global	Elkhart, IN	***	***	***	***	***
ERD	Westfield, MA	***	***	***	***	***
Eural	Chicago, IL	***	***	***	***	***
Extrudex	North Jackson, OH	***	***	***	***	***
Extrum	Choloma, HN	***	***	***	***	***
First Solar	Tempe, AZ	***	***	***	***	***
Ford Atlantic	Pine Brook, NJ	***	***	***	***	***
Fox Factory	Gainesville, GA	***	***	***	***	***
Hanon Alabama	Shorter, AL	***	***	***	***	***
Hanon USA	Novi, MI	***	***	***	***	***
Hanwha	Dalton, GA	***	***	***	***	***
Home Depot	Atlanta, GA	***	***	***	***	***
Hunter Douglas	Cerritos, CA	***	***	***	***	***

Table continued.

**Table IV-1 Continued**

**Aluminum extrusions: U.S. importers, their headquarters, and share of imports within each source, 2022**

Share in percent

<b>Firm</b>	<b>Headquarters</b>	<b>Subject sources</b>	<b>China, nonsubject</b>	<b>All other sources</b>	<b>Nonsubject sources</b>	<b>All import sources</b>
Hussmann	Bridgeton, MO	***	***	***	***	***
Hydro Extrusion	Rosemont, IL	***	***	***	***	***
Hydro Precision Monterrey	Rockledge, FL	***	***	***	***	***
Hydro Precision USA	Rockledge, FL	***	***	***	***	***
Icon Best	Pompano Beach, FL	***	***	***	***	***
Industrias Feliciano	Aguadilla, PR	***	***	***	***	***
JL Trading	Bayamon, PR	***	***	***	***	***
Johnson Controls	Glendale, WI	***	***	***	***	***
Kingtom	Santo Domingo, DR	***	***	***	***	***
LCI	Elkhart, IN	***	***	***	***	***
LK Aluminum	Medley, FL	***	***	***	***	***
Lowes	Mooresville, NC	***	***	***	***	***
Mahle Behr	Troy, MI	***	***	***	***	***
Marvel	Ontario, CA	***	***	***	***	***
MC Aluminum	Weston, FL	***	***	***	***	***
M-D Building	Oklahoma City, OK	***	***	***	***	***
Modine	Racine, WI	***	***	***	***	***
New Hudson	Linwood, PA	***	***	***	***	***
Pennex	St. Louis, MO	***	***	***	***	***
Perfiles	Sabana Seca, PR	***	***	***	***	***
PGT	North Venice, FL	***	***	***	***	***
Polaris	Medina, MN	***	***	***	***	***
Press Metal	Cumming, GA	***	***	***	***	***
Productive Tool	Dallas, NC	***	***	***	***	***
Puertas y Ventanas	Quebradillas, PR	***	***	***	***	***
Samuel	Oakville, ON	***	***	***	***	***
Scope Metals	Bensalem, PA	***	***	***	***	***
Sinobec	Pompano Beach, FL	***	***	***	***	***
Sunrun	San Francisco, CA	***	***	***	***	***
Ta Chen	Long Beach, CA	***	***	***	***	***
Tesla	Austin, TX	***	***	***	***	***
TSA Metals	Temple City, CA	***	***	***	***	***
Turnils	Buford, GA	***	***	***	***	***

Table continued.

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

Share in percent

Firm	Headquarters	Subject sources	China, nonsubject	All other sources	Nonsubject sources	All import sources
U.S. Futaba	Santa Ana, CA	***	***	***	***	***
Unirac	Albuquerque, NM	***	***	***	***	***
ZMC	Woodbridge, ON	***	***	***	***	***
All firms	Various	***	***	***	***	***

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 "---".

## U.S. imports

Table IV-2 and figure IV-1 present data for U.S. imports of aluminum extrusions from the subject sources and all other sources. Subject and nonsubject import quantities, values, and unit values generally increased from 2020-22, but were lower in interim 2023 than in interim 2022 (except for nonsubject import unit values).

Imports from subject sources increased 60.1 percent from 2020-22, but were 10.7 percent lower in interim 2023 than in interim 2022. Imports from nonsubject sources increased 14.6 percent from 2020-22, but were 8.4 percent lower in interim 2023 than in interim 2022. The average unit value of subject imports increased 17.3 percent from 2020-22, but were 2.6 percent lower in interim 2023 than in interim 2022. The average unit value of nonsubject sources increased 27.4 percent from 2020-22, and were 3.7 percent higher in interim 2023 than in interim 2022. The largest subject sources over the period were China (subject), Mexico, and Vietnam. While imports from each subject source increased from 2020-22, the subject sources which saw the largest percentage increase in imports from 2020-22 include Dominican Republic, India, and Turkey.

The ratio to U.S. production for imports from subject sources increased 18.6 percentage points from 2020-22, and was 2.9 percentage points higher in interim 2023 than in interim 2022. The ratio to U.S. production for imports from nonsubject sources increased 0.2 percentage points from 2020-22 and was 1.3 percentage points higher in interim 2023 than in interim 2022.

**Table IV-2**  
**Aluminum extrusions: U.S. imports, by source and period**

Quantity in short tons

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
China, subject	Quantity	***	***	***	***	***
Colombia	Quantity	***	***	***	***	***
Dominican Republic (DR)	Quantity	***	***	***	***	***
Ecuador	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Indonesia	Quantity	***	***	***	***	***
Italy	Quantity	***	***	***	***	***
Malaysia	Quantity	***	***	***	***	***
Mexico	Quantity	***	***	***	***	***
South Korea	Quantity	***	***	***	***	***
Taiwan	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Turkey	Quantity	***	***	***	***	***
United Arab Emirates	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	541,410	729,656	866,638	430,369	384,514
Subject sources less DR	Quantity	***	***	***	***	***
China, nonsubject	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	216,104	257,630	247,598	129,427	118,523
Nonsubject sources plus DR	Quantity	***	***	***	***	***
All import sources less DR	Quantity	***	***	***	***	***
All import sources	Quantity	757,515	987,286	1,114,236	559,797	503,038

Table continued.



**Table IV-2 Continued**  
**Aluminum extrusions: U.S. imports, by source and period**

Value in 1,000 dollars

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
China, subject	Value	***	***	***	***	***
Colombia	Value	***	***	***	***	***
Dominican Republic (DR)	Value	***	***	***	***	***
Ecuador	Value	***	***	***	***	***
India	Value	***	***	***	***	***
Indonesia	Value	***	***	***	***	***
Italy	Value	***	***	***	***	***
Malaysia	Value	***	***	***	***	***
Mexico	Value	***	***	***	***	***
South Korea	Value	***	***	***	***	***
Taiwan	Value	***	***	***	***	***
Thailand	Value	***	***	***	***	***
Turkey	Value	***	***	***	***	***
United Arab Emirates	Value	***	***	***	***	***
Vietnam	Value	***	***	***	***	***
Subject sources	Value	2,617,466	3,534,854	4,914,217	2,396,349	2,084,600
Subject sources less DR	Value	***	***	***	***	***
China, nonsubject	Value	***	***	***	***	***
All other sources	Value	***	***	***	***	***
Nonsubject sources	Value	1,357,864	1,761,347	1,981,383	1,018,837	967,274
Nonsubject sources plus DR	Value	***	***	***	***	***
All import sources less DR	Value	***	***	***	***	***
All import sources	Value	3,975,330	5,296,201	6,895,601	3,415,186	3,051,875

Table continued.

**Table IV-2 Continued**  
**Aluminum extrusions: U.S. imports, by source and period**

Unit value in dollars per short tons

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
China, subject	Unit value	***	***	***	***	***
Colombia	Unit value	***	***	***	***	***
Dominican Republic (DR)	Unit value	***	***	***	***	***
Ecuador	Unit value	***	***	***	***	***
India	Unit value	***	***	***	***	***
Indonesia	Unit value	***	***	***	***	***
Italy	Unit value	***	***	***	***	***
Malaysia	Unit value	***	***	***	***	***
Mexico	Unit value	***	***	***	***	***
South Korea	Unit value	***	***	***	***	***
Taiwan	Unit value	***	***	***	***	***
Thailand	Unit value	***	***	***	***	***
Turkey	Unit value	***	***	***	***	***
United Arab Emirates	Unit value	***	***	***	***	***
Vietnam	Unit value	***	***	***	***	***
Subject sources	Unit value	4,835	4,845	5,670	5,568	5,421
Subject sources less DR	Unit value	***	***	***	***	***
China, nonsubject	Unit value	***	***	***	***	***
All other sources	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	6,283	6,837	8,002	7,872	8,161
Nonsubject sources plus DR	Unit value	***	***	***	***	***
All import sources less DR	Unit value	***	***	***	***	***
All import sources	Unit value	5,248	5,364	6,189	6,101	6,067

Table continued.

**Table IV-2 Continued**  
**Aluminum extrusions: U.S. imports, by source and period**

Share in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
China, subject	Share of quantity	***	***	***	***	***
Colombia	Share of quantity	***	***	***	***	***
Dominican Republic (DR)	Share of quantity	***	***	***	***	***
Ecuador	Share of quantity	***	***	***	***	***
India	Share of quantity	***	***	***	***	***
Indonesia	Share of quantity	***	***	***	***	***
Italy	Share of quantity	***	***	***	***	***
Malaysia	Share of quantity	***	***	***	***	***
Mexico	Share of quantity	***	***	***	***	***
South Korea	Share of quantity	***	***	***	***	***
Taiwan	Share of quantity	***	***	***	***	***
Thailand	Share of quantity	***	***	***	***	***
Turkey	Share of quantity	***	***	***	***	***
United Arab Emirates	Share of quantity	***	***	***	***	***
Vietnam	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	71.5	73.9	77.8	76.9	76.4
Subject sources less DR	Share of quantity	***	***	***	***	***
China, nonsubject	Share of quantity	***	***	***	***	***
All other sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	28.5	26.1	22.2	23.1	23.6
Nonsubject sources plus DR	Share of quantity	***	***	***	***	***
All import sources less DR	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0

Table continued.

**Table IV-2 Continued**  
**Aluminum extrusions: U.S. imports, by source and period**

Share in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
China, subject	Share of value	***	***	***	***	***
Colombia	Share of value	***	***	***	***	***
Dominican Republic (DR)	Share of value	***	***	***	***	***
Ecuador	Share of value	***	***	***	***	***
India	Share of value	***	***	***	***	***
Indonesia	Share of value	***	***	***	***	***
Italy	Share of value	***	***	***	***	***
Malaysia	Share of value	***	***	***	***	***
Mexico	Share of value	***	***	***	***	***
South Korea	Share of value	***	***	***	***	***
Taiwan	Share of value	***	***	***	***	***
Thailand	Share of value	***	***	***	***	***
Turkey	Share of value	***	***	***	***	***
United Arab Emirates	Share of value	***	***	***	***	***
Vietnam	Share of value	***	***	***	***	***
Subject sources	Share of value	65.8	66.7	71.3	70.2	68.3
Subject sources less DR	Share of value	***	***	***	***	***
China, nonsubject	Share of value	***	***	***	***	***
All other sources	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	34.2	33.3	28.7	29.8	31.7
Nonsubject sources plus DR	Share of value	***	***	***	***	***
All import sources less DR	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0

Table continued.

**Table IV-2 Continued**  
**Aluminum extrusions: U.S. imports, by source and period**

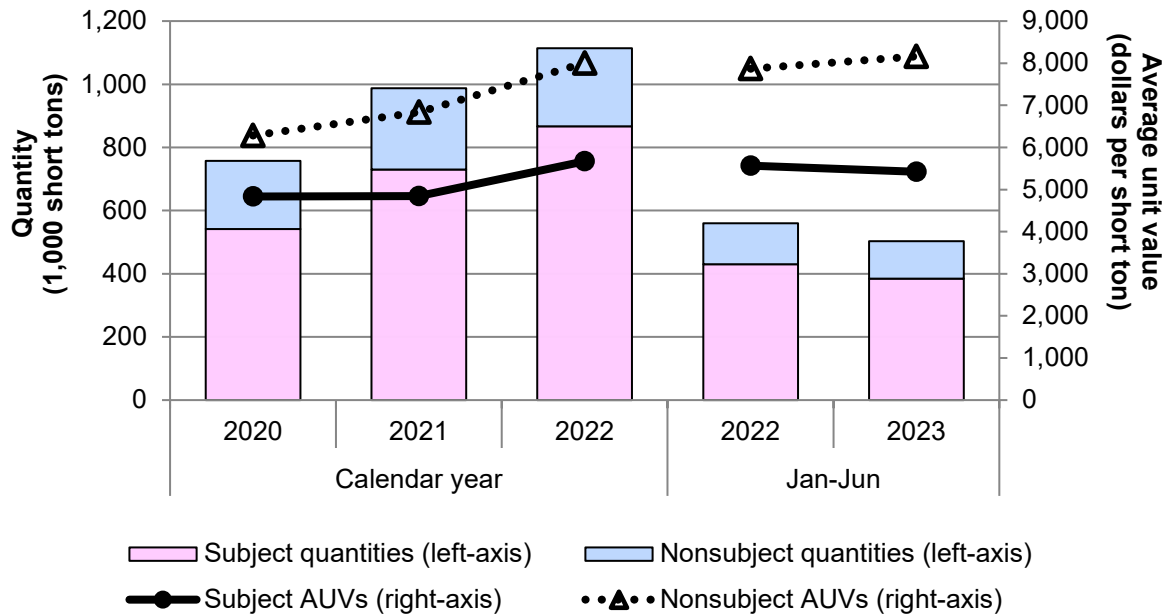
Ratio in percent; ratios represent the ratio to U.S. production

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
China, subject	Ratio	***	***	***	***	***
Colombia	Ratio	***	***	***	***	***
Dominican Republic (DR)	Ratio	***	***	***	***	***
Ecuador	Ratio	***	***	***	***	***
India	Ratio	***	***	***	***	***
Indonesia	Ratio	***	***	***	***	***
Italy	Ratio	***	***	***	***	***
Malaysia	Ratio	***	***	***	***	***
Mexico	Ratio	***	***	***	***	***
South Korea	Ratio	***	***	***	***	***
Taiwan	Ratio	***	***	***	***	***
Thailand	Ratio	***	***	***	***	***
Turkey	Ratio	***	***	***	***	***
United Arab Emirates	Ratio	***	***	***	***	***
Vietnam	Ratio	***	***	***	***	***
Subject sources	Ratio	45.2	53.0	63.8	59.2	62.1
Subject sources less DR	Ratio	***	***	***	***	***
China, nonsubject	Ratio	***	***	***	***	***
All other sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	18.1	18.7	18.2	17.8	19.1
Nonsubject sources plus DR	Ratio	***	***	***	***	***
All import sources less DR	Ratio	***	***	***	***	***
All import sources	Ratio	63.3	71.7	82.0	77.0	81.2

Source: Compiled from U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080, accessed November 8, 2023 and adjusted using data submitted in response to Commission questionnaires to report China subject vs. nonsubject data and to add in reported in-scope imports under other HTS statistical reporting numbers. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values.

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 "---".

**Figure IV-1**  
**Aluminum extrusions: U.S. import quantities and average unit values, by source and period**



Source: Compiled from U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080, accessed November 8, 2023 and adjusted using data submitted in response to Commission questionnaires to report China subject vs. nonsubject data and to add in reported in-scope imports under other HTS statistical reporting numbers. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values.

Table IV-3 presents U.S. imports reported by U.S. producers and/or affiliated firms. U.S. producers and affiliated firms reported imports in at least one period from \*\*\* sources since 2020. Most of these reported imports were from \*\*\* over all periods, followed by imports from \*\*\*.

**Table IV-3**  
**Aluminum extrusions: U.S. imports by U.S. producers and/or affiliated firms**

Quantity in short tons

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
China, subject	Quantity	***	***	***	***	***
Colombia	Quantity	***	***	***	***	***
Dominican Republic	Quantity	***	***	***	***	***
Ecuador	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Indonesia	Quantity	***	***	***	***	***
Italy	Quantity	***	***	***	***	***
Malaysia	Quantity	***	***	***	***	***
Mexico	Quantity	***	***	***	***	***
South Korea	Quantity	***	***	***	***	***
Taiwan	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Turkey	Quantity	***	***	***	***	***
United Arab Emirates	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
China, nonsubject	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***

Table continued.

**Table IV-3 Continued**  
**Aluminum extrusions: U.S. imports by U.S. producers and/or affiliated firms**

Ratio in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
China, subject	Ratio	***	***	***	***	***
Colombia	Ratio	***	***	***	***	***
Dominican Republic	Ratio	***	***	***	***	***
Ecuador	Ratio	***	***	***	***	***
India	Ratio	***	***	***	***	***
Indonesia	Ratio	***	***	***	***	***
Italy	Ratio	***	***	***	***	***
Malaysia	Ratio	***	***	***	***	***
Mexico	Ratio	***	***	***	***	***
South Korea	Ratio	***	***	***	***	***
Taiwan	Ratio	***	***	***	***	***
Thailand	Ratio	***	***	***	***	***
Turkey	Ratio	***	***	***	***	***
United Arab Emirates	Ratio	***	***	***	***	***
Vietnam	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
China, nonsubject	Ratio	***	***	***	***	***
All other sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

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

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 "---". The ratios represent the portion of adjusted official U.S. import statistics within the specified source that was imported by U.S. producers and/or their affiliates. These ratios are calculated based on data shown in this table from Commission questionnaires (numerators) and in table IV-2 (denominators).



Tables IV-4 and IV-5 present U.S. importers' U.S. shipments from subject and nonsubject sources, respectively, by type of shipment and period. The majority of U.S. shipments from both subject sources and nonsubject sources were commercial shipments in all periods.<sup>4</sup> \*\*\* percent of U.S. importers' U.S. shipments from subject sources in 2022 were of commercial shipments, while \*\*\* percent of U.S. shipments from subject sources in the same period were internal consumption. \*\*\* percent of U.S. importers' U.S. shipments from nonsubject sources in 2022 were of commercial shipments, while \*\*\* percent of U.S. shipments from nonsubject sources in the same period were internal consumption.<sup>5</sup>

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<sup>4</sup> Commercial shipments as a share of U.S. shipments from subject sources ranged from \*\*\* percent (in interim 2023) to \*\*\* percent (in interim 2022). Commercial shipments as a share of U.S. shipments from nonsubject sources ranged from \*\*\* percent (in 2020) to \*\*\* percent in 2022 and interim 2023.

<sup>5</sup> U.S. importers were asked if they further process and sell in the U.S. their imported aluminum extrusions (regardless of source) which after processing still meet the definition of aluminum extrusions given in the questionnaire, and if so the share of their imports so processed. Nineteen U.S. importers reported such processing; based on their reported shares of imports which were further processed, \*\*\* tons of reported imports of aluminum extrusions in 2022 were so processed and sold in the U.S.

**Table IV-4**  
**Aluminum extrusions: U.S. importers' U.S. shipments from subject sources, by type and period**

Quantity in short tons; value in 1,000 dollars; unit values in dollars per short ton; shares in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Commercial U.S. shipments	Quantity	***	***	***	***	***
Internal consumption	Quantity	***	***	***	***	***
Transfers to related firms	Quantity	***	***	***	***	***
U.S. shipments	Quantity	***	***	***	***	***
Commercial U.S. shipments	Value	***	***	***	***	***
Internal consumption	Value	***	***	***	***	***
Transfers to related firms	Value	***	***	***	***	***
U.S. shipments	Value	***	***	***	***	***
Commercial U.S. shipments	Unit value	***	***	***	***	***
Internal consumption	Unit value	***	***	***	***	***
Transfers to related firms	Unit value	***	***	***	***	***
U.S. shipments	Unit value	***	***	***	***	***
Commercial U.S. shipments	Share of quantity	***	***	***	***	***
Internal consumption	Share of quantity	***	***	***	***	***
Transfers to related firms	Share of quantity	***	***	***	***	***
U.S. shipments	Share of quantity	***	***	***	***	***
Commercial U.S. shipments	Share of value	***	***	***	***	***
Internal consumption	Share of value	***	***	***	***	***
Transfers to related firms	Share of value	***	***	***	***	***
U.S. shipments	Share of value	***	***	***	***	***

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 IV-5**  
**Aluminum extrusions: U.S. importers' U.S. shipments from nonsubject sources, by type and period**

Quantity in short tons; value in 1,000 dollars; unit values in dollars per short ton; shares in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Commercial U.S. shipments	Quantity	***	***	***	***	***
Internal consumption	Quantity	***	***	***	***	***
Transfers to related firms	Quantity	***	***	***	***	***
U.S. shipments	Quantity	***	***	***	***	***
Commercial U.S. shipments	Value	***	***	***	***	***
Internal consumption	Value	***	***	***	***	***
Transfers to related firms	Value	***	***	***	***	***
U.S. shipments	Value	***	***	***	***	***
Commercial U.S. shipments	Unit value	***	***	***	***	***
Internal consumption	Unit value	***	***	***	***	***
Transfers to related firms	Unit value	***	***	***	***	***
U.S. shipments	Unit value	***	***	***	***	***
Commercial U.S. shipments	Share of quantity	***	***	***	***	***
Internal consumption	Share of quantity	***	***	***	***	***
Transfers to related firms	Share of quantity	***	***	***	***	***
U.S. shipments	Share of quantity	***	***	***	***	***
Commercial U.S. shipments	Share of value	***	***	***	***	***
Internal consumption	Share of value	***	***	***	***	***
Transfers to related firms	Share of value	***	***	***	***	***
U.S. shipments	Share of value	***	***	***	***	***

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 "---".

## 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>6</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>7</sup>

Table IV-6 presents information on imports from the subject countries in the most recent 12-month period for which data are available (i.e., October 2022 through September 2023). Imports from China (subject), Colombia, Indonesia, Malaysia, Mexico, and Vietnam accounted for \*\*\* percent, \*\*\* percent, \*\*\* percent, \*\*\* percent, \*\*\* percent, and \*\*\* percent, respectively, of total imports of aluminum extrusions in this period. While imports from Dominican Republic, Ecuador, India, Italy, South Korea, Taiwan, Thailand, Turkey, and United Arab Emirates were individually less than 3 percent of total imports in this period, these sources collectively accounted for \*\*\* percent in this period.<sup>8</sup>

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<sup>6</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>7</sup> Section 771 (24) of the Act (19 U.S.C § 1677(24)).

<sup>8</sup> Data presented in this table are based on official import statistics with the following adjustments: (1) data submitted in response to Commission questionnaires to report China subject vs. nonsubject data; (2) data submitted in response to Commission questionnaires to add additional in-scope imports reported under “other” (i.e., non-primary) HTS statistical reporting numbers; (3) data submitted in response to Commission questionnaires to remove products other than aluminum extrusions (i.e., out-of-scope merchandise); and (4) data compiled from proprietary Census-edited, Customs records using the primary HTS numbers to remove imports reported by firms that certified “no” in their questionnaire responses they do not import aluminum extrusions. The largest adjustment derives from adjustment (2) to include in-scope imports reported under non-primary HTS numbers (importers reported that \*\*\* total short tons (i.e., from all sources) were entered under “other” HTS numbers from October 2022 through September 2023). Most of these “other” HTS imports were reported by \*\*\*. Table IV-6 is presented without adjustments (except to separate China subject and nonsubject) in app. F.

**Table IV-6****Aluminum extrusions: U.S. imports in the twelve-month period preceding the filing of the petition, October 2022 through September 2023**

Quantity in short tons; share of quantity in percent

Source of imports	Investigation type	Quantity	Share of quantity	Share of individually negligible sources
China, subject	AD/CVD	***	***	***
Colombia	AD	***	***	***
Dominican Republic (DR)	AD	***	***	***
Ecuador	AD	***	***	***
India	AD	***	***	***
Indonesia	AD/CVD	***	***	***
Italy	AD	***	***	***
Malaysia	AD	***	***	***
Mexico	AD/CVD	***	***	***
South Korea	AD	***	***	***
Taiwan	AD	***	***	***
Thailand	AD	***	***	***
Turkey	AD/CVD	***	***	***
United Arab Emirates	AD	***	***	***
Vietnam	AD	***	***	***
Subject sources	Not applicable	***	***	***
Subject sources less DR	Not applicable	***	***	***
China, nonsubject	Not applicable	***	***	NA
All other sources	Not applicable	***	***	NA
Nonsubject sources	Not applicable	***	***	NA
Nonsubject sources plus DR	Not applicable	***	***	NA
All import sources	Not applicable	***	***	NA

Source: Compiled from U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080, accessed November 8, 2023, adjusted using (1) data submitted in response to Commission questionnaires to report China subject vs. nonsubject data, (2) data submitted in response to Commission questionnaires to add additional in-scope imports reported under other HTS statistical reporting numbers, (3) data submitted in response to Commission questionnaires to remove products other than aluminum extrusions (i.e., out-of-scope merchandise) reported by Commission questionnaire respondents, and (4) data compiled from proprietary Census-edited, Customs records using the same statistical reporting numbers listed above to remove imports reported by firms that certified "no" they do not import aluminum extrusions. Imports are based on the imports for consumption data series from all data sources.

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 IV-7 and figure IV-2 provide additional information concerning Dominican Republic.

**Table IV-7**  
**Aluminum extrusions: U.S. imports from Dominican Republic (DR) and all sources in various twelve-month periods leading up to the twelve months immediately prior to the filing of the petition**

Quantity in short tons; share of quantity in percent

Twelve-month period through to and including	DR quantity	Other than DR quantity	All import sources quantity	DR share	Other than DR share	All import sources share
January 2022	***	***	***	***	***	***
February 2022	***	***	***	***	***	***
March 2022	***	***	***	***	***	***
April 2022	***	***	***	***	***	***
May 2022	***	***	***	***	***	***
June 2022	***	***	***	***	***	***
July 2022	***	***	***	***	***	***
August 2022	***	***	***	***	***	***
September 2022	***	***	***	***	***	***
October 2022	***	***	***	***	***	***
November 2022	***	***	***	***	***	***
December 2022	***	***	***	***	***	***
January 2023	***	***	***	***	***	***
February 2023	***	***	***	***	***	***
March 2023	***	***	***	***	***	***
April 2023	***	***	***	***	***	***
May 2023	***	***	***	***	***	***
June 2023	***	***	***	***	***	***
July 2023	***	***	***	***	***	***
August 2023	***	***	***	***	***	***
September 2023	***	***	***	***	***	***

Source: Compiled from U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080, accessed November 8, 2023, adjusted using (1) data submitted in response to Commission questionnaires to report China subject vs. nonsubject data, (2) data submitted in response to Commission questionnaires to add additional in-scope imports reported under other HTS statistical reporting numbers, (3) data submitted in response to Commission questionnaires to remove products other than aluminum extrusions (i.e., out-of-scope merchandise) reported by Commission questionnaire respondents, and (4) data compiled from proprietary Census-edited, Customs records using the same statistical reporting numbers listed above to remove imports reported by firms that certified "no" they do not import aluminum extrusions. Imports are based on the imports for consumption data series from all data sources.

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 "--".

**Figure IV-2**

**Aluminum extrusions: Share of U.S. imports from Dominican Republic out of total imports in the various twelve-month periods in the lead up to the twelve months immediately prior to the filing of the petition**

\* \* \* \* \*

Source: Compiled from U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080, accessed November 8, 2023, adjusted using (1) data submitted in response to Commission questionnaires to report China subject vs. nonsubject data, (2) data submitted in response to Commission questionnaires to add additional in-scope imports reported under other HTS statistical reporting numbers, (3) data submitted in response to Commission questionnaires to remove products other than aluminum extrusions (i.e., out-of-scope merchandise) reported by Commission questionnaire respondents, and (4) data compiled from proprietary Census-edited, Customs records using the same statistical reporting numbers listed above to remove imports reported by firms that certified "no" they do not import aluminum extrusions. Imports are based on the imports for consumption data series from all data sources.

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 IV-8 and figure IV-3 provide additional information concerning Turkey.

**Table IV-8****Aluminum extrusions: U.S. imports from Turkey and all sources in various twelve-month periods leading up to the twelve months immediately prior to the filing of the petition**

Quantity in short tons; share of quantity in percent

Twelve-month period through to and including	Turkey quantity	Other than Turkey quantity	All import sources quantity	Turkey share	Other than Turkey share	All import sources share
January 2022	***	***	***	***	***	***
February 2022	***	***	***	***	***	***
March 2022	***	***	***	***	***	***
April 2022	***	***	***	***	***	***
May 2022	***	***	***	***	***	***
June 2022	***	***	***	***	***	***
July 2022	***	***	***	***	***	***
August 2022	***	***	***	***	***	***
September 2022	***	***	***	***	***	***
October 2022	***	***	***	***	***	***
November 2022	***	***	***	***	***	***
December 2022	***	***	***	***	***	***
January 2023	***	***	***	***	***	***
February 2023	***	***	***	***	***	***
March 2023	***	***	***	***	***	***
April 2023	***	***	***	***	***	***
May 2023	***	***	***	***	***	***
June 2023	***	***	***	***	***	***
July 2023	***	***	***	***	***	***
August 2023	***	***	***	***	***	***
September 2023	***	***	***	***	***	***

Source: Compiled from U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080, accessed November 8, 2023, adjusted using (1) data submitted in response to Commission questionnaires to report China subject vs. nonsubject data, (2) data submitted in response to Commission questionnaires to add additional in-scope imports reported under other HTS statistical reporting numbers, (3) data submitted in response to Commission questionnaires to remove products other than aluminum extrusions (i.e., out-of-scope merchandise) reported by Commission questionnaire respondents, and (4) data compiled from proprietary Census-edited, Customs records using the same statistical reporting numbers listed above to remove imports reported by firms that certified "no" they do not import aluminum extrusions. Imports are based on the imports for consumption data series from all data sources.

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 "---".



**Figure IV-3**

**Aluminum extrusions: Share of U.S. imports from Turkey out of total imports in the various twelve-month periods in the lead up to the twelve months immediately prior to the filing of the petition**

\* \* \* \* \*

Source: Compiled from U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080, accessed November 8, 2023, adjusted using (1) data submitted in response to Commission questionnaires to report China subject vs. nonsubject data, (2) data submitted in response to Commission questionnaires to add additional in-scope imports reported under other HTS statistical reporting numbers, (3) data submitted in response to Commission questionnaires to remove products other than aluminum extrusions (i.e., out-of-scope merchandise) reported by Commission questionnaire respondents, and (4) data compiled from proprietary Census-edited, Customs records using the same statistical reporting numbers listed above to remove imports reported by firms that certified "no" they do not import aluminum extrusions. Imports are based on the imports for consumption data series from all data sources.

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 "---".

## 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-9 and figure IV-4, and table IV-10 and figure IV-5, present information on U.S. producers' and U.S. importers' U.S. shipments by alloy designation<sup>9</sup> and finish.<sup>10</sup>

U.S. producers shipped in all alloy designations, with the largest share of shipments constituting 6000 series alloys (\*\*\*) percent, followed by 1000 series and then 3000 series designations, while shipments of 5000 series alloys were minimal (only \*\*\* total short tons shipped in 2022). Shipments of imports from subject sources included all alloy designations except 5000 series designations, with most shipments from most sources constituting 6000 series alloys (\*\*\*) percent), followed by 3000 series and then 1000 series. While shipments of imports of 6000 series alloys were reported from each subject source, only five sources reported shipments of 3000 series alloys, and only two sources reported shipments of 1000 series alloys.

---

<sup>9</sup> Alloy designations included 1000s series alloys, 3000s series alloys, 6000s series alloys (or their equivalents), as well as 5000s series alloy that has a 2.0 percent or lower magnesium content or its equivalent.

<sup>10</sup> Finishes included anodized or other special finishes (e.g., powder coating), or unworked (i.e., no special finishes).

**Table IV-9**  
**Aluminum extrusions: U.S. producers' and U.S. importers' U.S. shipments, by source and series,**  
**2022**

Quantity in short tons

Source	1000 series	3000 series	5000 series	6000 series	All series
U.S. producers	***	***	***	***	***
China, subject	***	***	***	***	***
Colombia	***	***	***	***	***
Dominican Republic	***	***	***	***	***
Ecuador	***	***	***	***	***
India	***	***	***	***	***
Indonesia	***	***	***	***	***
Italy	***	***	***	***	***
Malaysia	***	***	***	***	***
Mexico	***	***	***	***	***
South Korea	***	***	***	***	***
Taiwan	***	***	***	***	***
Thailand	***	***	***	***	***
Turkey	***	***	***	***	***
United Arab Emirates	***	***	***	***	***
Vietnam	***	***	***	***	***
Subject sources	***	***	***	***	***
China, nonsubject	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	***	***	***	***	***

Table continued

**Table IV-9 Continued**  
**Aluminum extrusions: U.S. producers' and U.S. importers' U.S. shipments, by source and series, 2022**

Share across in percent

Source	1000 series	3000 series	5000 series	6000 series	All series
U.S. producers	***	***	***	***	***
China, subject	***	***	***	***	***
Colombia	***	***	***	***	***
Dominican Republic	***	***	***	***	***
Ecuador	***	***	***	***	***
India	***	***	***	***	***
Indonesia	***	***	***	***	***
Italy	***	***	***	***	***
Malaysia	***	***	***	***	***
Mexico	***	***	***	***	***
South Korea	***	***	***	***	***
Taiwan	***	***	***	***	***
Thailand	***	***	***	***	***
Turkey	***	***	***	***	***
United Arab Emirates	***	***	***	***	***
Vietnam	***	***	***	***	***
Subject sources	***	***	***	***	***
China, nonsubject	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	***	***	***	***	***

Table continued

**Table IV-9 Continued**  
**Aluminum extrusions: U.S. producers' and U.S. importers' U.S. shipments, by source and series, 2022**

Share down in percent

Source	1000 series	3000 series	5000 series	6000 series	All series
U.S. producers	***	***	***	***	***
China, subject	***	***	***	***	***
Colombia	***	***	***	***	***
Dominican Republic	***	***	***	***	***
Ecuador	***	***	***	***	***
India	***	***	***	***	***
Indonesia	***	***	***	***	***
Italy	***	***	***	***	***
Malaysia	***	***	***	***	***
Mexico	***	***	***	***	***
South Korea	***	***	***	***	***
Taiwan	***	***	***	***	***
Thailand	***	***	***	***	***
Turkey	***	***	***	***	***
United Arab Emirates	***	***	***	***	***
Vietnam	***	***	***	***	***
Subject sources	***	***	***	***	***
China, nonsubject	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
All sources	***	***	***	***	***

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 "---".

**Figure IV-4**  
**Aluminum extrusions: U.S. producers' and U.S. importers' U.S. shipments, by source and series, 2022**

\* \* \* \* \*

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

As shown in table IV-10, U.S. producers shipped both anodized/finished and unworked aluminum extrusions, with most shipments from U.S. producers being unworked (\*\*\*) percent). Most shipments of imports from subject sources were anodized/finished (\*\*\*) percent) and anodized/finished accounted for a \*\*\* majority of shipments from most sources. Each subject source reported shipments of both anodized/finished and unworked aluminum extrusions.

**Table IV-10**  
**Aluminum extrusions: U.S. producers' and U.S. importers' U.S. shipments, by source and finish, 2022**

Quantity in short tons

<b>Source</b>	<b>Anodized / special</b>	<b>Unworked</b>	<b>All finishes</b>
U.S. producers	***	***	***
China, subject	***	***	***
Colombia	***	***	***
Dominican Republic	***	***	***
Ecuador	***	***	***
India	***	***	***
Indonesia	***	***	***
Italy	***	***	***
Malaysia	***	***	***
Mexico	***	***	***
South Korea	***	***	***
Taiwan	***	***	***
Thailand	***	***	***
Turkey	***	***	***
United Arab Emirates	***	***	***
Vietnam	***	***	***
Subject sources	***	***	***
China, nonsubject	***	***	***
All other sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
All sources	***	***	***

Table continued.

**Table IV-10 Continued**  
**Aluminum extrusions: U.S. producers' and U.S. importers' U.S. shipments, by source and finish, 2022**

Share across in percent

<b>Source</b>	<b>Anodized / special</b>	<b>Unworked</b>	<b>All finishes</b>
U.S. producers	***	***	***
China, subject	***	***	***
Colombia	***	***	***
Dominican Republic	***	***	***
Ecuador	***	***	***
India	***	***	***
Indonesia	***	***	***
Italy	***	***	***
Malaysia	***	***	***
Mexico	***	***	***
South Korea	***	***	***
Taiwan	***	***	***
Thailand	***	***	***
Turkey	***	***	***
United Arab Emirates	***	***	***
Vietnam	***	***	***
Subject sources	***	***	***
China, nonsubject	***	***	***
All other sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
All sources	***	***	***

Table continued.



**Table IV-10 Continued**  
**Aluminum extrusions: U.S. producers' and U.S. importers' U.S. shipments, by source and finish, 2022**

Share down in percent

Source	Anodized / special	Unworked	All finishes
U.S. producers	***	***	***
China, subject	***	***	***
Colombia	***	***	***
Dominican Republic	***	***	***
Ecuador	***	***	***
India	***	***	***
Indonesia	***	***	***
Italy	***	***	***
Malaysia	***	***	***
Mexico	***	***	***
South Korea	***	***	***
Taiwan	***	***	***
Thailand	***	***	***
Turkey	***	***	***
United Arab Emirates	***	***	***
Vietnam	***	***	***
Subject sources	***	***	***
China, nonsubject	***	***	***
All other sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
All sources	***	***	***

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 "---".

**Figure IV-5**  
**Aluminum extrusions: U.S. producers' and U.S. importers' U.S. shipments, by source and finish, 2022**

\* \* \* \* \*

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

Figures IV-6 and IV-7 present U.S. producers' and U.S. importers' shares of all U.S. shipments quantity by alloy designation (series) and finish, respectively.

**Figure IV-6**  
**Aluminum extrusions: U.S. producers' and U.S. importers' share of all U.S. shipments quantity, by series, 2022**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires

Note: Market shares above are based solely on questionnaire responses as presented in Table IV-9 and are not equal to the total quantity of apparent consumption.

**Figure IV-7**  
**Aluminum extrusions: U.S. producers' and U.S. importers' share of all U.S. shipments quantity, by finish, 2022**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires

Note: Market shares above are based solely on questionnaire responses as presented in Table IV-10 and are not equal to the total quantity of apparent consumption.

## Geographical markets

Table IV-11 presents data on U.S. imports by source and border of entry in 2022. Imports from all sources entered through all borders of entry in 2022, except that no imports from Ecuador entered through Northern borders of entry. China was the largest source of imports to Eastern borders of entry (15.3 percent) and Northern borders of entry (13.9 percent) in 2022, while Mexico was the largest source of imports to Southern borders of entry (27.3 percent) and Western borders of entry in 2022 (27.5 percent).

**Table IV-11**  
**Aluminum extrusions: U.S. imports by source and border of entry, 2022**

Quantity in short tons

Source	East	North	South	West	All borders
China	37,182	26,151	10,260	32,221	105,814
Colombia	3,052	5	63,241	39	66,337
Dominican Republic	8,886	101	6,149	293	15,429
Ecuador	1,502	---	17,726	58	19,286
India	11,548	2,397	4,788	2,015	20,749
Indonesia	8,183	3,621	17,630	6,990	36,424
Italy	10,372	1,264	3,143	672	15,451
Malaysia	2,606	6,146	3,142	5,898	17,792
Mexico	7,022	7	64,613	41,475	113,118
South Korea	5,006	519	2,392	2,990	10,906
Taiwan	2,131	1,122	782	5,913	9,948
Thailand	4,626	3,565	412	3,961	12,564
Turkey	21,495	6,515	9,359	2,171	39,540
United Arab Emirates	2,333	937	1,551	192	5,014
Vietnam	26,825	21,330	15,222	21,313	84,690
Subject sources	152,769	73,679	220,410	126,202	573,060
Nonsubject sources	90,273	114,026	16,396	24,711	245,405
All import sources	243,042	187,704	236,806	150,913	818,465

Table continued.

**Table IV-11 Continued**  
**Aluminum extrusions: U.S. imports by source and border of entry, 2022**

Share across in percent

<b>Source</b>	<b>East</b>	<b>North</b>	<b>South</b>	<b>West</b>	<b>All borders</b>
China	35.1	24.7	9.7	30.5	100.0
Colombia	4.6	0.0	95.3	0.1	100.0
Dominican Republic	57.6	0.7	39.9	1.9	100.0
Ecuador	7.8	---	91.9	0.3	100.0
India	55.7	11.6	23.1	9.7	100.0
Indonesia	22.5	9.9	48.4	19.2	100.0
Italy	67.1	8.2	20.3	4.4	100.0
Malaysia	14.6	34.5	17.7	33.2	100.0
Mexico	6.2	0.0	57.1	36.7	100.0
South Korea	45.9	4.8	21.9	27.4	100.0
Taiwan	21.4	11.3	7.9	59.4	100.0
Thailand	36.8	28.4	3.3	31.5	100.0
Turkey	54.4	16.5	23.7	5.5	100.0
United Arab Emirates	46.5	18.7	30.9	3.8	100.0
Vietnam	31.7	25.2	18.0	25.2	100.0
Subject sources	26.7	12.9	38.5	22.0	100.0
Nonsubject sources	36.8	46.5	6.7	10.1	100.0
All import sources	29.7	22.9	28.9	18.4	100.0

Table continued.

**Table IV-11 Continued**  
**Aluminum extrusions: U.S. imports by source and border of entry, 2022**

Share down in percent

Source	East	North	South	West	All borders
China	15.3	13.9	4.3	21.4	12.9
Colombia	1.3	0.0	26.7	0.0	8.1
Dominican Republic	3.7	0.1	2.6	0.2	1.9
Ecuador	0.6	---	7.5	0.0	2.4
India	4.8	1.3	2.0	1.3	2.5
Indonesia	3.4	1.9	7.4	4.6	4.5
Italy	4.3	0.7	1.3	0.4	1.9
Malaysia	1.1	3.3	1.3	3.9	2.2
Mexico	2.9	0.0	27.3	27.5	13.8
South Korea	2.1	0.3	1.0	2.0	1.3
Taiwan	0.9	0.6	0.3	3.9	1.2
Thailand	1.9	1.9	0.2	2.6	1.5
Turkey	8.8	3.5	4.0	1.4	4.8
United Arab Emirates	1.0	0.5	0.7	0.1	0.6
Vietnam	11.0	11.4	6.4	14.1	10.3
Subject sources	62.9	39.3	93.1	83.6	70.0
Nonsubject sources	37.1	60.7	6.9	16.4	30.0
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 statistical reporting numbers 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080, accessed November 8, 2023. Imports are based on the imports for consumption data series.

Note: Data presented are official U.S. import statistics under the primary HTS numbers without any adjustments. As a result, these data are not broken out by China subject vs. nonsubject, nor do they include adjustments present in other tables, and therefore data by source may be over- or understated. 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

Table IV-12 and figures IV-8 and IV-9 present data on U.S. imports by source and month from January 2020 to September 2023. Imports from all individual subject sources were present in every month from January 2020 to September 2023.

**Table IV-12**  
**Aluminum extrusions: Quantity of U.S. imports, by source and month**

Quantity in short tons

Year	Month	China	Colombia	Dominican Republic	Ecuador	India	Indonesia	Italy	Malaysia
2020	January	7,502	2,580	289	694	643	2,208	1,306	1,439
2020	February	6,603	2,889	352	1,053	567	1,894	1,035	1,215
2020	March	3,399	3,034	341	962	667	2,184	1,174	1,004
2020	April	6,439	1,875	183	287	541	2,113	927	1,065
2020	May	6,272	2,586	168	1,059	404	2,196	646	299
2020	June	7,318	2,975	336	1,265	390	1,371	1,048	1,031
2020	July	9,356	3,820	299	1,236	801	1,473	1,202	1,059
2020	August	8,736	3,539	874	1,070	668	1,981	1,200	1,326
2020	September	9,180	4,017	1,260	1,260	691	2,317	1,108	1,266
2020	October	9,115	3,801	536	1,497	918	1,984	1,308	1,551
2020	November	8,890	2,969	398	1,362	612	2,075	1,636	1,535
2020	December	9,296	3,707	479	1,324	814	2,426	1,615	1,309
2021	January	10,142	2,852	364	1,318	787	3,488	1,777	1,333
2021	February	7,365	3,530	500	1,239	909	2,628	1,221	1,041
2021	March	10,806	4,172	483	1,355	990	2,502	916	1,434
2021	April	8,485	4,153	437	1,256	1,102	4,171	1,652	1,187
2021	May	8,292	3,642	1,087	1,082	974	2,765	1,104	1,674
2021	June	10,225	3,686	1,361	1,295	838	3,574	1,478	1,434
2021	July	9,308	5,188	1,610	1,520	987	2,803	1,144	1,058
2021	August	9,000	4,760	1,711	1,285	1,222	4,413	1,307	842
2021	September	8,311	5,511	1,606	1,373	1,365	2,728	634	699
2021	October	9,353	4,202	1,875	1,213	1,250	3,522	962	864
2021	November	8,834	4,366	2,484	1,147	1,262	2,955	1,019	1,330
2021	December	6,606	5,175	2,021	1,665	1,317	4,324	913	1,708

Table continued.

**Table IV-12 Continued**  
**Aluminum extrusions: Quantity of U.S. imports, by source and month**

Quantity in short tons

Year	Month	China	Colombia	Dominican Republic	Ecuador	India	Indonesia	Italy	Malaysia
2022	January	8,869	3,448	1,973	1,615	1,381	3,330	991	1,568
2022	February	8,989	4,278	1,410	1,411	1,323	2,928	951	872
2022	March	9,267	5,537	864	1,755	1,558	2,225	1,379	1,821
2022	April	8,276	4,747	1,067	1,717	1,265	4,423	1,412	1,439
2022	May	9,248	4,967	715	1,683	1,936	3,123	1,519	1,694
2022	June	8,778	5,929	586	1,727	1,626	2,016	1,345	1,516
2022	July	8,711	5,346	636	1,638	1,267	3,707	1,175	1,484
2022	August	10,084	6,813	1,567	1,363	1,761	3,099	1,559	1,815
2022	September	9,551	6,116	1,297	1,753	2,071	2,573	779	1,592
2022	October	8,329	6,536	1,675	1,488	2,786	4,139	1,113	1,643
2022	November	7,937	7,054	1,991	1,385	2,201	2,900	1,248	1,341
2022	December	7,774	5,565	1,647	1,754	1,573	1,960	1,979	1,007
2023	January	7,597	4,648	1,183	1,170	2,268	2,991	1,350	1,229
2023	February	8,339	6,282	1,965	1,544	1,417	1,392	932	1,065
2023	March	5,503	5,916	1,845	1,543	2,267	1,999	1,793	1,149
2023	April	8,990	6,737	1,915	1,826	1,913	2,159	1,718	1,147
2023	May	8,785	6,317	2,238	1,712	1,455	2,589	1,556	824
2023	June	8,747	7,058	2,006	1,328	1,989	2,249	1,812	803
2023	July	8,844	6,152	2,669	1,682	1,364	1,995	1,716	1,052
2023	August	8,109	7,042	2,130	1,893	1,959	2,162	1,383	994
2023	September	7,651	5,320	1,901	1,786	1,614	2,521	765	986

Table continued.



**Table IV-12 Continued**  
**Aluminum extrusions: Quantity of U.S. imports, by source and month**

Quantity in short tons

Year	Month	Mexico	South Korea	Taiwan	Thailand	Turkey	United Arab Emirates	Vietnam
2020	January	4,924	655	493	618	1,151	518	3,945
2020	February	4,097	729	246	559	905	542	3,151
2020	March	5,033	629	557	1,127	1,446	237	3,400
2020	April	3,973	706	686	1,089	1,366	81	3,756
2020	May	3,313	499	740	794	1,397	72	3,433
2020	June	5,420	551	606	1,071	1,273	119	3,224
2020	July	6,174	573	780	926	1,631	27	2,884
2020	August	5,618	552	662	871	1,790	110	2,795
2020	September	6,745	363	673	754	1,422	55	4,031
2020	October	6,522	713	585	801	1,790	311	3,996
2020	November	5,329	678	573	929	1,624	465	4,759
2020	December	5,922	634	718	1,109	2,007	240	5,022
2021	January	5,854	878	1,027	524	2,272	111	4,244
2021	February	6,299	1,077	882	712	1,819	49	3,710
2021	March	7,317	1,027	1,003	1,226	1,915	104	3,921
2021	April	7,580	915	1,364	995	2,544	52	4,862
2021	May	7,046	586	1,311	1,179	3,139	45	7,282
2021	June	8,152	841	834	1,080	2,970	119	5,758
2021	July	7,457	614	949	1,164	1,869	114	5,534
2021	August	8,310	1,055	698	1,210	2,259	89	5,007
2021	September	8,837	748	446	1,107	2,547	193	5,277
2021	October	7,840	657	630	1,071	3,276	420	5,809
2021	November	7,910	924	385	583	2,699	292	6,113
2021	December	7,491	1,039	677	828	3,230	244	6,719

Table continued.

**Table IV-12 Continued**  
**Aluminum extrusions: Quantity of U.S. imports, by source and month**

Quantity in short tons

Year	Month	Mexico	South Korea	Taiwan	Thailand	Turkey	United Arab Emirates	Vietnam
2022	January	7,780	934	640	580	3,178	223	5,798
2022	February	8,382	682	868	902	3,838	238	7,310
2022	March	10,097	789	1,035	1,030	3,559	392	8,503
2022	April	11,124	955	1,045	1,855	3,644	506	7,505
2022	May	11,057	1,108	906	1,486	3,541	977	9,159
2022	June	10,354	1,047	1,220	1,609	3,354	186	8,567
2022	July	11,021	1,290	887	1,091	4,038	551	7,881
2022	August	10,067	659	1,070	926	2,946	698	8,348
2022	September	8,150	811	652	672	3,498	480	7,014
2022	October	8,297	1,080	525	864	2,731	160	5,532
2022	November	8,873	875	577	858	2,499	310	4,257
2022	December	7,916	677	524	691	2,716	293	4,818
2023	January	8,582	1,277	617	992	2,366	265	4,939
2023	February	7,109	609	605	568	1,699	330	4,723
2023	March	9,230	800	680	1,092	1,502	170	3,997
2023	April	8,720	1,135	580	894	1,556	320	4,362
2023	May	9,347	616	531	729	2,051	362	3,737
2023	June	9,777	607	534	892	2,390	308	4,614
2023	July	9,253	711	329	960	3,186	285	4,133
2023	August	8,554	1,051	439	937	2,299	224	4,761
2023	September	7,998	816	559	956	2,135	497	4,436

Table continued.

**Table IV-12 Continued**  
**Aluminum extrusions: Quantity of U.S. imports, by source and month**

Quantity in short tons

<b>Year</b>	<b>Month</b>	<b>Subject sources</b>	<b>Nonsubject sources</b>	<b>All import sources</b>
2020	January	28,967	18,583	47,549
2020	February	25,836	17,859	43,694
2020	March	25,196	18,855	44,051
2020	April	25,086	15,887	40,973
2020	May	23,878	17,933	41,812
2020	June	27,997	15,681	43,678
2020	July	32,241	17,238	49,479
2020	August	31,792	17,398	49,190
2020	September	35,141	17,509	52,650
2020	October	35,427	19,198	54,625
2020	November	33,835	20,166	54,001
2020	December	36,621	17,229	53,851
2021	January	36,970	18,492	55,462
2021	February	32,984	18,880	51,864
2021	March	39,169	22,491	61,660
2021	April	40,758	20,772	61,530
2021	May	41,209	21,923	63,132
2021	June	43,646	22,953	66,598
2021	July	41,320	21,812	63,132
2021	August	43,168	24,617	67,786
2021	September	41,382	20,426	61,808
2021	October	42,946	21,458	64,404
2021	November	42,304	22,163	64,466
2021	December	43,955	19,403	63,358

Table continued.

**Table IV-12 Continued**  
**Aluminum extrusions: Quantity of U.S. imports, by source and month**

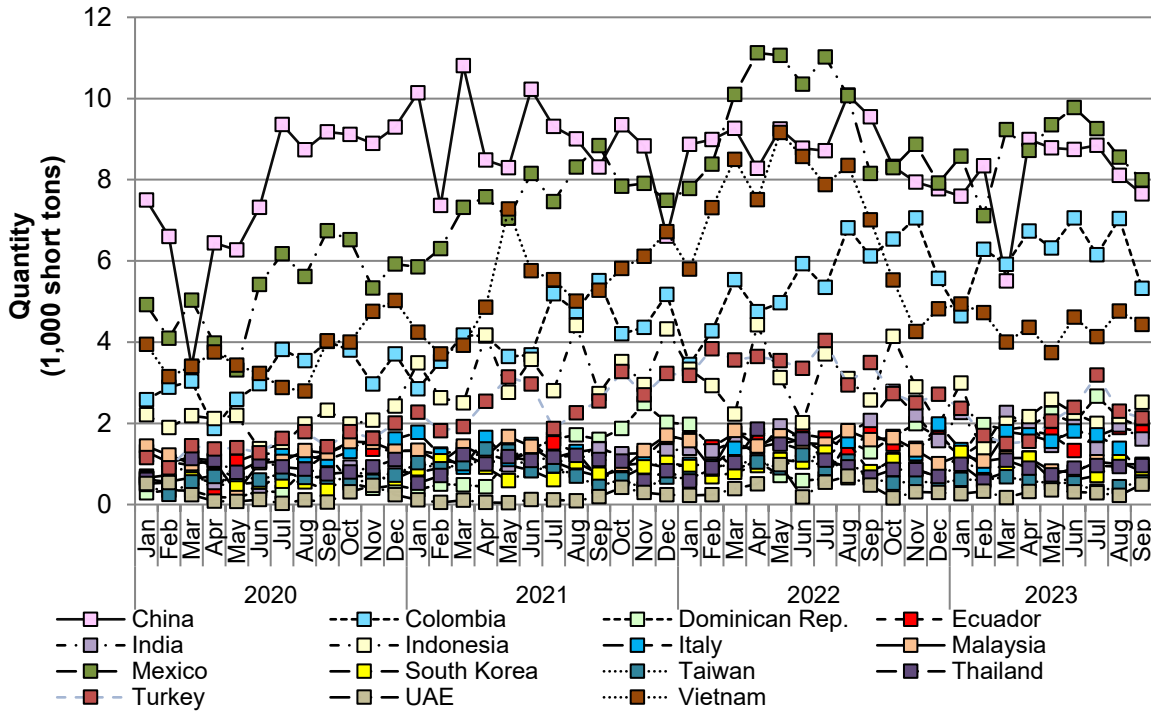
Quantity in short tons

Year	Month	Subject sources	Nonsubject sources	All import sources
2022	January	42,309	19,788	62,098
2022	February	44,380	18,498	62,878
2022	March	49,811	24,000	73,810
2022	April	50,980	20,428	71,408
2022	May	53,119	23,399	76,518
2022	June	49,859	22,161	72,020
2022	July	50,721	19,886	70,606
2022	August	52,774	21,148	73,921
2022	September	47,010	19,478	66,488
2022	October	46,897	20,717	67,614
2022	November	44,307	19,108	63,415
2022	December	40,894	16,794	57,688
2023	January	41,473	18,846	60,319
2023	February	38,579	17,423	56,002
2023	March	39,485	20,276	59,761
2023	April	43,972	18,454	62,426
2023	May	42,849	22,340	65,190
2023	June	45,115	20,242	65,358
2023	July	44,332	19,823	64,155
2023	August	43,937	20,365	64,302
2023	September	39,941	17,528	57,469

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting numbers 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080, accessed November 8, 2023. Imports are based on the imports for consumption data series.

Note: Data presented are official U.S. import statistics under the primary HTS numbers without any adjustments. As a result, these data are not broken out by China subject vs. nonsubject, nor do they include adjustments present in other tables, and therefore data by source may be over- or understated. 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 "---".

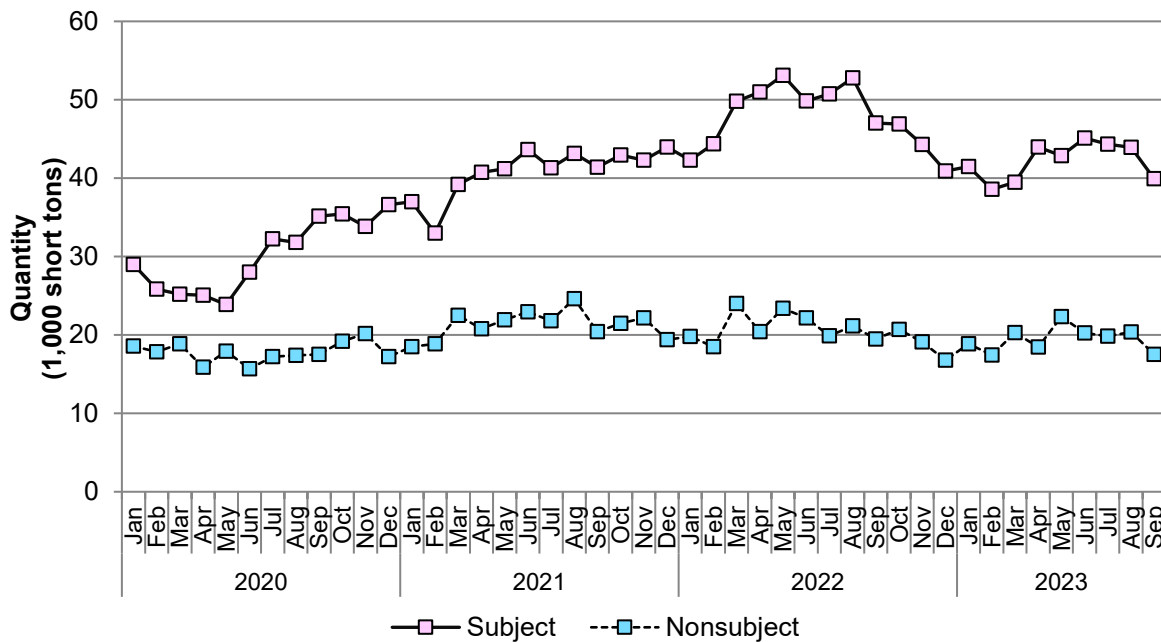
**Figure IV-8**  
**Aluminum extrusions: U.S. imports from individual subject sources, by month**



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting numbers 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080, accessed November 8, 2023. Imports are based on the imports for consumption data series.

Note: Data presented are official U.S. import statistics under the primary HTS numbers without any adjustments. As a result, these data are not broken out by China subject vs. nonsubject, nor do they include adjustments present in other tables, and therefore data by source may be over- or understated. 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 "---".

**Figure IV-9**  
**Aluminum extrusions: 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 statistical reporting numbers 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080, accessed November 8, 2023. Imports are based on the imports for consumption data series.

Note: Data presented are official U.S. import statistics under the primary HTS numbers without any adjustments. As a result, these data are not broken out by China subject vs. nonsubject, nor do they include adjustments present in other tables, and therefore data by source may be over- or understated. 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 "---".

## Apparent U.S. consumption and market shares

### Quantity

Table IV-13 and figure IV-10 present data on apparent U.S. consumption and U.S. market shares by quantity for aluminum extrusions. Apparent consumption increased 25.7 percent from 2020-22, but was 12.5 percent lower in interim 2023 than in interim 2022. Market share held by U.S. producers decreased 6.8 percentage points from 2020-22 and was 1.2 percentage points lower in interim 2023 than in interim 2022. Market share held by imports from subject sources increased 7.8 percentage points from 2020-22 and was 0.7 percentage points higher in interim 2023 than in interim 2022. Market share held by imports from

nonsubject sources decreased 1.0 percentage points from 2020-22 but was 0.5 percentage points higher in interim 2023 than in interim 2022.

**Table IV-13**  
**Aluminum extrusions: Apparent U.S. consumption and market shares based on quantity, by source and period**

Quantity in short tons

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. producers	Quantity	1,146,677	1,292,717	1,278,489	681,375	583,558
China, subject	Quantity	***	***	***	***	***
Colombia	Quantity	***	***	***	***	***
Dominican Republic (DR)	Quantity	***	***	***	***	***
Ecuador	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Indonesia	Quantity	***	***	***	***	***
Italy	Quantity	***	***	***	***	***
Malaysia	Quantity	***	***	***	***	***
Mexico	Quantity	***	***	***	***	***
South Korea	Quantity	***	***	***	***	***
Taiwan	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Turkey	Quantity	***	***	***	***	***
United Arab Emirates	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	541,410	729,656	866,638	430,369	384,514
Subject sources less DR	Quantity	***	***	***	***	***
China, nonsubject	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	216,104	257,630	247,598	129,427	118,523
Nonsubject sources plus DR	Quantity	***	***	***	***	***
All import sources less DR	Quantity	***	***	***	***	***
All import sources	Quantity	757,515	987,286	1,114,236	559,797	503,038
All sources	Quantity	1,904,192	2,280,003	2,392,725	1,241,172	1,086,596

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

**Table IV-13 Continued**  
**Aluminum extrusions: Apparent U.S. consumption and market shares based on quantity, by source and period**

Shares in percent

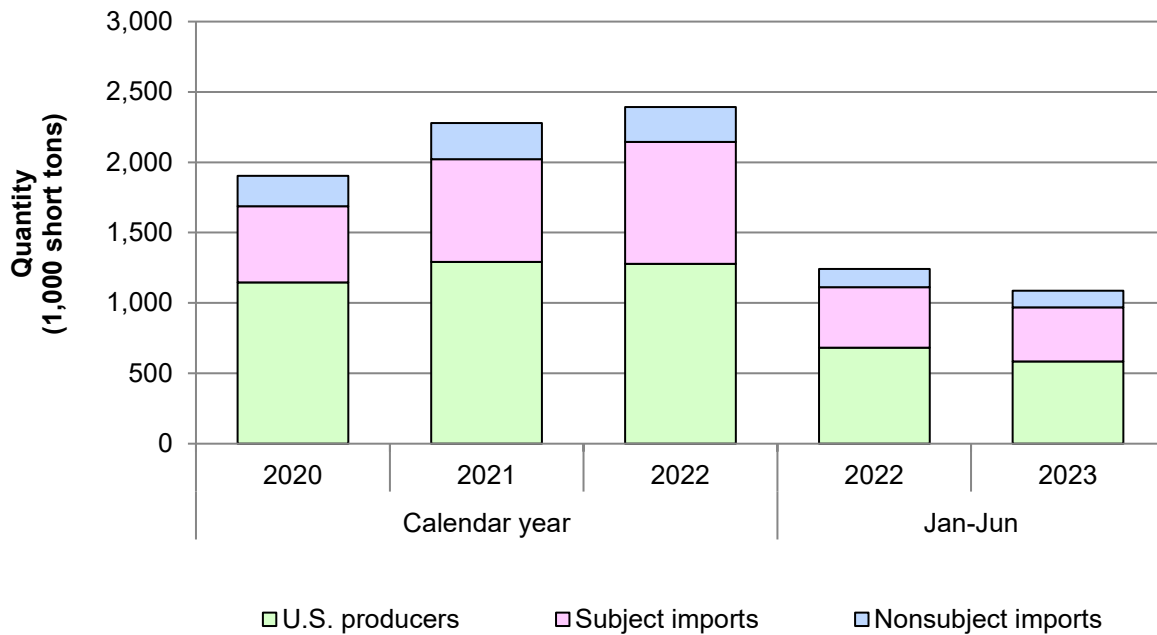
Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. producers	Share	60.2	56.7	53.4	54.9	53.7
China, subject	Share	***	***	***	***	***
Colombia	Share	***	***	***	***	***
Dominican Republic (DR)	Share	***	***	***	***	***
Ecuador	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Indonesia	Share	***	***	***	***	***
Italy	Share	***	***	***	***	***
Malaysia	Share	***	***	***	***	***
Mexico	Share	***	***	***	***	***
South Korea	Share	***	***	***	***	***
Taiwan	Share	***	***	***	***	***
Thailand	Share	***	***	***	***	***
Turkey	Share	***	***	***	***	***
United Arab Emirates	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	28.4	32.0	36.2	34.7	35.4
Subject sources less DR	Share	***	***	***	***	***
China, nonsubject	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	11.3	11.3	10.3	10.4	10.9
Nonsubject sources plus DR	Share	***	***	***	***	***
All import sources less DR	Share	***	***	***	***	***
All import sources	Share	39.8	43.3	46.6	45.1	46.3
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: U.S. producer data are compiled from data submitted in response to Commission questionnaires. Import data are compiled from U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080, accessed November 8, 2023, adjusted using data submitted in response to Commission questionnaires to report China subject vs. nonsubject data and to add in reported in-scope imports under other HTS statistical reporting numbers. 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 "---". The import data in this table do not exclude out-of-scope merchandise for companies that certified they do not import aluminum extrusions to USITC questionnaires.



**Figure IV-10**  
**Aluminum extrusions: Apparent U.S. consumption based on quantity, by source and period**



Source: U.S. producer data are compiled from data submitted in response to Commission questionnaires. Import data are compiled from U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080, accessed November 8, 2023, adjusted using data submitted in response to Commission questionnaires to report China subject vs. nonsubject data and to add in reported in-scope imports under other HTS statistical reporting numbers. Imports are based on the imports for consumption data series.

## Value

Table IV-14 and figure IV-11 present data on apparent U.S. consumption and U.S. market shares by value for aluminum extrusions. Apparent consumption by value increased 72.0 percent from 2020-22, but was 17.3 percent lower in interim 2023 than in interim 2022. Market share by value held by U.S. producers decreased 0.4 percentage points from 2020-22 and was 3.5 percentage points lower in interim 2023 than in interim 2022. Market share held by imports from subject sources increased 2.8 percentage points from 2020-22 and was 1.6 percentage points higher in interim 2023 than in interim 2022. Market share held by imports from nonsubject sources decreased 2.4 percentage points from 2020-22 but was 1.9 percentage points higher in interim 2023 than in interim 2022.

**Table IV-14****Aluminum extrusions: Apparent U.S. consumption and market shares based on value, by source and period**

Value in 1,000 dollars

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. producers	Value	4,672,169	6,428,153	7,978,765	4,390,875	3,401,641
China, subject	Value	***	***	***	***	***
Colombia	Value	***	***	***	***	***
Dominican Republic (DR)	Value	***	***	***	***	***
Ecuador	Value	***	***	***	***	***
India	Value	***	***	***	***	***
Indonesia	Value	***	***	***	***	***
Italy	Value	***	***	***	***	***
Malaysia	Value	***	***	***	***	***
Mexico	Value	***	***	***	***	***
South Korea	Value	***	***	***	***	***
Taiwan	Value	***	***	***	***	***
Thailand	Value	***	***	***	***	***
Turkey	Value	***	***	***	***	***
United Arab Emirates	Value	***	***	***	***	***
Vietnam	Value	***	***	***	***	***
Subject sources	Value	2,617,466	3,534,854	4,914,217	2,396,349	2,084,600
Subject sources less DR	Value	***	***	***	***	***
China, nonsubject	Value	***	***	***	***	***
All other sources	Value	***	***	***	***	***
Nonsubject sources	Value	1,357,864	1,761,347	1,981,383	1,018,837	967,274
Nonsubject sources plus DR	Value	***	***	***	***	***
All import sources less DR	Value	***	***	***	***	***
All import sources	Value	3,975,330	5,296,201	6,895,601	3,415,186	3,051,875
All sources	Value	8,647,499	11,724,354	14,874,366	7,806,061	6,453,516

Table continued.

**Table IV-14 Continued**

**Aluminum extrusions: Apparent U.S. consumption and market shares based on value, by source and period**

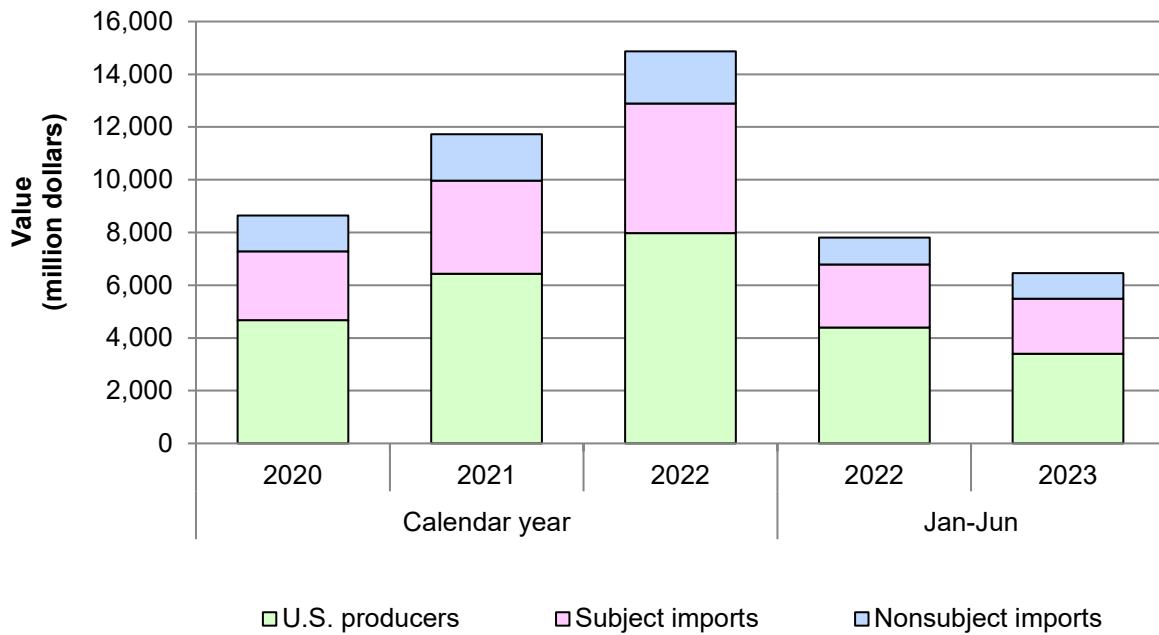
Shares in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. producers	Share	54.0	54.8	53.6	56.2	52.7
China, subject	Share	***	***	***	***	***
Colombia	Share	***	***	***	***	***
Dominican Republic (DR)	Share	***	***	***	***	***
Ecuador	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Indonesia	Share	***	***	***	***	***
Italy	Share	***	***	***	***	***
Malaysia	Share	***	***	***	***	***
Mexico	Share	***	***	***	***	***
South Korea	Share	***	***	***	***	***
Taiwan	Share	***	***	***	***	***
Thailand	Share	***	***	***	***	***
Turkey	Share	***	***	***	***	***
United Arab Emirates	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	30.3	30.1	33.0	30.7	32.3
Subject sources less DR	Share	***	***	***	***	***
China, nonsubject	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	15.7	15.0	13.3	13.1	15.0
Nonsubject sources plus DR	Share	***	***	***	***	***
All import sources less DR	Share	***	***	***	***	***
All import sources	Share	46.0	45.2	46.4	43.8	47.3
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: U.S. producer data are compiled from data submitted in response to Commission questionnaires. Import data are compiled from U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080, accessed November 8, 2023, adjusted using data submitted in response to Commission questionnaires to report China subject vs. nonsubject data and to add in reported in-scope imports under other HTS statistical reporting numbers. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values.

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 import data in this table do not exclude out-of-scope merchandise for companies that certified they do not import aluminum extrusions to USITC questionnaires.

**Figure IV-11**  
**Aluminum extrusions: Apparent U.S. consumption based on value, by source and period**



Source: U.S. producer data are compiled from data submitted in response to Commission questionnaires. Import data are compiled from U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080, accessed November 8, 2023, adjusted using data submitted in response to Commission questionnaires to report China subject vs. nonsubject data and to add in reported in-scope imports under other HTS statistical reporting numbers. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values.

# Part V: Pricing data

## Factors affecting prices

### Raw material costs

Raw materials increased from approximately 58.7 percent of the cost of goods sold (“COGS”) for aluminum extrusions in 2020 to 67.7 percent in 2022. However, raw materials as a percent of COGS decreased from 70.9 percent in January-June 2022 to 63.3 percent in January-June 2023.

The primary raw material used to manufacture aluminum extrusions is aluminum, a commodity traded globally. The global price of aluminum fell from \$0.80 per pound in January 2020 to \$0.66 in April 2020. It then increased to \$1.59 per pound in March 2022 before decreasing to \$0.98 in July 2023 (figure V-1 and table V-1). U.S. aluminum extrusions producers sometimes purchase aluminum based on the Midwest premium all-in price of aluminum (described below), which followed similar trends (figure V-1 and table V-1).

**Figure V-1**  
**Raw materials: Global price of aluminum, January 2020-September 2023, and Midwest all-in price, mid, January 2020-October 2023.**

\* \* \* \* \*

Source: International Monetary Fund, Global price of Aluminum (PALUMUSD), retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/PALUMUSD>, October 9, 2023, and November 6, 2023; Fastmarkets Aluminum P1020A all-in price, delivered Midwest US, November 6, 2023; and staff calculations.

**Table V-1****Raw materials: Global price of aluminum, January 2020-September 2023, and Midwest all-in price, mid, January 2020-October 2023.**

Price in dollars per pound

Year	Month	Global aluminum price	Midwest all-in price
2020	January	0.80	***
2020	February	0.77	***
2020	March	0.73	***
2020	April	0.66	***
2020	May	0.67	***
2020	June	0.71	***
2020	July	0.75	***
2020	August	0.79	***
2020	September	0.79	***
2020	October	0.82	***
2020	November	0.88	***
2020	December	0.91	***
2021	January	0.91	***
2021	February	0.94	***
2021	March	0.99	***
2021	April	1.05	***
2021	May	1.10	***
2021	June	1.11	***
2021	July	1.13	***
2021	August	1.18	***
2021	September	1.29	***
2021	October	1.33	***
2021	November	1.20	***
2021	December	1.22	***
2022	January	1.36	***
2022	February	1.47	***
2022	March	1.59	***
2022	April	1.47	***
2022	May	1.29	***
2022	June	1.17	***
2022	July	1.09	***
2022	August	1.10	***
2022	September	1.01	***
2022	October	1.02	***
2022	November	1.07	***
2022	December	1.09	***
2023	January	1.13	***
2023	February	1.10	***
2023	March	1.04	***
2023	April	1.06	***
2023	May	1.03	***
2023	June	0.99	***
2023	July	0.98	***
2023	August	0.97	***
2023	September	0.99	***
2023	October	n.a.	***

Source: International Monetary Fund, Global price of Aluminum (PALUMUSD), retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/PALUMUSD>, October 9, 2023, and November 6, 2023; Fastmarkets Aluminum P1020A all-in price, delivered Midwest US, November 6, 2023; and staff calculations.

## Transportation costs to the U.S. market

Table V-2 summarizes transportation costs for aluminum extrusions shipped from subject countries to the United States in 2022. Such costs ranged from 0.9 percent for aluminum extrusions from Mexico to 16.5 percent for aluminum extrusions shipped from Indonesia.

**Table V-2**  
**Aluminum extrusions: Transportation costs to the U.S. market**

Percent of customs value accounted for by transportation costs

Source	Transportation costs to the U.S. market
China	15.3
Colombia	2.5
Dominican Republic	5.1
Ecuador	4.3
India	5.7
Indonesia	16.5
Italy	8.3
Malaysia	6.9
Mexico	0.9
South Korea	9.9
Taiwan	6.1
Thailand	12.4
Turkey	8.9
United Arab Emirates	9.0
Vietnam	4.8

Source: Official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080, accessed Friday, October 13, 2023. Imports are based on the imports for consumption data series.

Note: 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 within each source.

## U.S. inland transportation costs

Twenty-two responding U.S. producers and 43 importers reported that they typically arrange transportation to their customers, while seven U.S. producers and ten importers reported that their customers usually do. Twenty-seven importers stated that they shipped from a storage facility while 22 shipped from their point of importation. U.S. producers and importers described a similar range of U.S. inland transportation costs, with most U.S. producers reporting that their U.S. inland transportation costs ranged from 2.0 to 9.0 percent and most importers reporting costs of 0.5 to 10.0 percent.

## Pricing practices

### Pricing methods

U.S. producers and importers reported setting prices using a wide variety of methods, including transaction-by-transaction negotiations, contracts, and price lists (table V-3).

**Table V-3**  
**Aluminum extrusions: 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	25	28
Contract	20	18
Set price list	12	23
Other	2	12
Responding firms	29	61

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.

Some U.S. producers and importers sell aluminum extrusions based on conversion costs, i.e., charging for the conversion from aluminum to aluminum extrusions, with a pass-through for raw material (aluminum) costs. Twenty-two U.S. producers and 22 importers used raw material cost pass-throughs. These firms described using the Midwest premium (a premium over the London Metals Exchange (LME) price, as published by Platt's), the LME price, or the COMEX price of aluminum in such contracts. However, 13 U.S. producers and 30 importers sold aluminum extrusions based on the total cost of the aluminum extrusions.<sup>1</sup>

U.S. producers reported selling most of their aluminum extrusions in the spot market while importers sold a plurality of their aluminum extrusions under long-term contracts (table V-4). However, both U.S. producer and subject importers had sales under long-term contracts, annual contracts, short-term contracts, and spot sales.

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<sup>1</sup> Several U.S. producers and importers indicated other methods, including noting that they did not sell aluminum extrusions, instead using aluminum extrusions to make downstream products.



**Table V-4**  
**Aluminum extrusions: 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	13.5	47.7
Annual contracts	14.7	5.1
Short-term contracts	9.4	14.6
Spot sales	62.5	32.5
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.

Both U.S. producers and importers described short-term contracts as generally having durations of 30-180 days. They also typically described long-term contracts as having durations of 2-3 years.

Ten U.S. producers and ten importers indicated that their short-term contracts did not allow price renegotiations, with four U.S. producers and three importers indicating that such contracts did. Eight U.S. producers and eight importers stated that such contracts fixed price and quantity, while six U.S. producers and four importers stated that they fixed only price. Two importers stated that short-term contracts fixed only quantity. Thirteen of 15 responding U.S. producers and 12 of 14 importers stated that these contracts were indexed to raw material costs.

Ten U.S. producers and eight importers indicated that their annual contracts did not allow price renegotiations, with eight U.S. producers and four importers indicating that such contracts did. Eleven U.S. producers and two importers stated that such contracts fixed price and quantity, while five U.S. producers and seven importers stated that they fixed only price. Two importers stated that annual contracts fixed only quantity. Fifteen of 17 responding U.S. producers and 9 of 12 importers stated that these contracts were indexed to raw material costs.

Seven U.S. producers and one importer indicated that their long-term contracts did not allow price renegotiations, with five U.S. producers and five importers indicating that such contracts did. Five U.S. producers stated that such contracts fixed price and quantity, while six U.S. producers and three importers stated that they fixed only price. All 11 responding U.S. producers and 5 of 6 importers stated that these contracts were indexed to raw material costs.

## Sales terms and discounts

Regarding sales terms for aluminum extrusions, 18 U.S. producers and 40 importers typically quote prices on a delivered basis, while 12 U.S. producers and 22 importers typically quote prices on an f.o.b. basis.

Most suppliers of aluminum extrusions do not offer regular discounts. Eleven U.S. producers and 34 importers had no discount policy. Eight U.S. producers and 10 importers offered quantity discounts, while 10 U.S. producers and four importers offered total volume discounts. Other discounts reported included early payment discounts and rebates to larger customers.

## Price data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following aluminum extrusions products shipped to unrelated U.S. customers during January 2020-June 2023.

**Product 1.**-- Mullions and Split-Mullions, Anodized Finish, Unworked, Alloy in the 6000 series – Size: 1.75" x 3" to 3" x 8", Weight: 0.6lb/ft to 7lb/ft.

**Product 2.**-- Tub and shower components, Anodized and Bright Dip Finishes, Unworked, Alloys in the 6000 series – Size: CCD: 0.6" to 3", Weight: 0.1 lb/ft to 1lb/ft.

**Product 3.**-- Noise Vibration and Harshness (NVH) Brackets and Inner Inserts, 6061-T6, single or multi-void hollows, 7"-12" CCD, wt/ft 1-8 lbs, e-coated or uncoated, cut to length, machined, deburred.

**Product 4.**-- Window Treatments, including Vertical Blinds and Shades, Painted Finish, Alloy in the 6000 series – Size: CCD: 1.0" to 6.0", Weight: 0.20 lb/ft to 2.0 lb/ft.

Thirteen U.S. producers and 12 importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.<sup>2</sup> Pricing data reported by U.S. producers accounted for approximately 6.2 percent of U.S.

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<sup>2</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. Product 1 consists of mullions, which are the vertical bars between the panes of glass in a window. Product 3 consists of NVH brackets, designed to reduce noise and vibration, particularly in cars and trucks.

producers' U.S. commercial shipments in 2022 and 4.9 percent of importers' commercial shipments. Table V-5 shows pricing as a share of commercial shipments by source.

**Table V-5**  
**Aluminum extrusions: U.S. producers' and U.S. importers' pricing product data as a share of commercial U.S. shipments, by source, 2022**

Share in percent

Source	Pricing data as a share of commercial shipments
United States	6.2
China	***
Colombia	***
Dominican Republic	***
Ecuador	***
India	***
Indonesia	***
Italy	***
Malaysia	***
Mexico	***
South Korea	***
Taiwan	***
Thailand	***
Turkey	***
United Arab Emirates	***
Vietnam	***
Subject sources	4.9

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

Price data for products 1-4 are presented in tables V-6 to V-9 and figures V-2 to V-9.<sup>3</sup>

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

**Table V-6****Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter**

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

Period	US price	US quantity	China price	China quantity	China margin	Colombia price	Colombia quantity	Colombia margin
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	***	***	***	***	***	***	***	***

Period	Dominican Republic price	Dominican Republic quantity	Dominican Republic margin	Ecuador price	Ecuador quantity	Ecuador margin
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	***	***	***	***	***	***

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**Table V-6 Continued**

**Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter**

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

Period	US price	US quantity	India price	India quantity	India margin	Indonesia price	Indonesia quantity	Indonesia margin
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	***	***	***	***	***	***	***	***

Period	Italy price	Italy quantity	Italy margin	Malaysia price	Malaysia quantity	Malaysia margin
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	***	***	***	***	***	***

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**Table V-6 Continued**

**Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter**

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

Period	US price	US quantity	Mexico price	Mexico quantity	Mexico margin	South Korea price	South Korea quantity	South Korea margin
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	***	***	***	***	***	***	***	***

Period	Taiwan price	Taiwan quantity	Taiwan margin	Thailand price	Thailand quantity	Thailand margin
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 on next page.

**Table V-6 Continued**

**Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter**

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

Period	US price	US quantity	Turkey price	Turkey quantity	Turkey margin	United Arab Emirates price	United Arab Emirates quantity	United Arab Emirates margin
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	***	***	***	***	***	***	***	***

Period	Vietnam price	Vietnam quantity	Vietnam margin	All subject price	All subject quantity	All subject margin
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: Mullions and Split-Mullions, Anodized Finish, Unworked, Alloy in the 6000 series – Size: 1.75” x 3” to 3” x 8”, Weight: 0.6lb/ft to 7lb/ft.

**Figure V-2**

**Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by source and quarter**

**Price of product 1**

\* \* \* \* \*

**Volume of product 1**

\* \* \* \* \*

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

Note: Product 1: Mullions and Split-Mullions, Anodized Finish, Unworked, Alloy in the 6000 series – Size: 1.75” x 3” to 3” x 8”, Weight: 0.6lb/ft to 7lb/ft.



**Figure V-3**

**Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, data combined for all subject countries, by source and quarter**

**Price of product 1**

\* \* \* \* \*

**Volume of product 1**

\* \* \* \* \*

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

Note: Product 1: Mullions and Split-Mullions, Anodized Finish, Unworked, Alloy in the 6000 series – Size: 1.75” x 3” to 3” x 8”, Weight: 0.6lb/ft to 7lb/ft.

**Table V-7****Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter**

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

Period	US price	US quantity	China price	China quantity	China margin	Colombia price	Colombia quantity	Colombia margin
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	***	***	***	***	***	***	***	***

Period	Dominican Republic price	Dominican Republic quantity	Dominican Republic margin	Ecuador price	Ecuador quantity	Ecuador margin
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	***	***	***	***	***	***

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**Table V-7 Continued**

**Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter**

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

Period	US price	US quantity	India price	India quantity	India margin	Indonesia price	Indonesia quantity	Indonesia margin
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	***	***	***	***	***	***	***	***

Period	Italy price	Italy quantity	Italy margin	Malaysia price	Malaysia quantity	Malaysia margin
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	***	***	***	***	***	***

Note: \*\*\*.

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**Table V-7 Continued**

**Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter**

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

Period	US price	US quantity	Mexico price	Mexico quantity	Mexico margin	South Korea price	South Korea quantity	South Korea margin
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	***	***	***	***	***	***	***	***

Period	Taiwan price	Taiwan quantity	Taiwan margin	Thailand price	Thailand quantity	Thailand margin
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 on next page.

**Table V-7 Continued**

**Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter**

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

Period	US price	US quantity	Turkey price	Turkey quantity	Turkey margin	United Arab Emirates price	United Arab Emirates quantity	United Arab Emirates margin
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	***	***	***	***	***	***	***	***

Period	Vietnam price	Vietnam quantity	Vietnam margin	All subject price	All subject quantity	All subject margin
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: Tub and shower components, Anodized and Bright Dip Finishes, Unworked, Alloys in the 6000 series – Size: CCD: 0.6” to 3”, Weight: 0.1 lb/ft to 1lb/ft.

**Figure V-4**

**Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by source and quarter**

**Price of product 2**

\* \* \* \* \*

**Volume of product 2**

\* \* \* \* \*

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

Note: Product 2: Tub and shower components, Anodized and Bright Dip Finishes, Unworked, Alloys in the 6000 series – Size: CCD: 0.6” to 3”, Weight: 0.1 lb/ft to 1lb/ft.

**Figure V-5**

**Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, data combined for all subject countries, by source and quarter**

**Price of product 2**

\* \* \* \* \*

**Volume of product 2**

\* \* \* \* \*

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

Note: Product 2: Tub and shower components, Anodized and Bright Dip Finishes, Unworked, Alloys in the 6000 series – Size: CCD: 0.6” to 3”, Weight: 0.1 lb/ft to 1lb/ft.

**Table V-8****Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter**

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

Period	US price	US quantity	China price	China quantity	China margin	Colombia price	Colombia quantity	Colombia margin
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	***	***	***	***	***	***	***	***

Period	Dominican Republic price	Dominican Republic quantity	Dominican Republic margin	Ecuador price	Ecuador quantity	Ecuador margin
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	***	***	***	***	***	***

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**Table V-8 Continued**

**Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter**

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

Period	US price	US quantity	India price	India quantity	India margin	Indonesia price	Indonesia quantity	Indonesia margin
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	***	***	***	***	***	***	***	***

Period	Italy price	Italy quantity	Italy margin	Malaysia price	Malaysia quantity	Malaysia margin
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 on next page.

**Table V-8 Continued**

**Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter**

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

Period	US price	US quantity	Mexico price	Mexico quantity	Mexico margin	South Korea price	South Korea quantity	South Korea margin
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	***	***	***	***	***	***	***	***

Period	Taiwan price	Taiwan quantity	Taiwan margin	Thailand price	Thailand quantity	Thailand margin
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 on next page.

**Table V-8 Continued**

**Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter**

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

Period	US price	US quantity	Turkey price	Turkey quantity	Turkey margin	United Arab Emirates price	United Arab Emirates quantity	United Arab Emirates margin
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	***	***	***	***	***	***	***	***

Period	Vietnam price	Vietnam quantity	Vietnam margin	All subject price	All subject quantity	All subject margin
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: Noise Vibration and Harshness (NVH) Brackets and Inner Inserts, 6061-T6, single or multi-void hollows, 7"-12" CCD, wt/ft 1-8 lbs, e-coated or uncoated, cut to length, machined, deburred.

**Figure V-6**  
**Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by source and quarter**

**Price of product 3**

\* \* \* \* \*

**Volume of product 3**

\* \* \* \* \*

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

Note: Product 3: Noise Vibration and Harshness (NVH) Brackets and Inner Inserts, 6061-T6, single or multi-void hollows, 7"-12" CCD, wt/ft 1-8 lbs, e-coated or uncoated, cut to length, machined, deburred.

**Figure V-7**

**Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, data combined for all subject countries, by source and quarter**

**Price of product 3**

\* \* \* \* \*

**Volume of product 3**

\* \* \* \* \*

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

Note: Product 3: Noise Vibration and Harshness (NVH) Brackets and Inner Inserts, 6061-T6, single or multi-void hollows, 7"-12" CCD, wt/ft 1-8 lbs, e-coated or uncoated, cut to length, machined, deburred.

**Table V-9**

**Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source and quarter**

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

Period	US price	US quantity	China price	China quantity	China margin	Colombia price	Colombia quantity	Colombia margin
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	***	***	***	***	***	***	***	***

Period	Dominican Republic price	Dominican Republic quantity	Dominican Republic margin	Ecuador price	Ecuador quantity	Ecuador margin
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 on next page.

**Table V-9 Continued**

**Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source and quarter**

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

Period	US price	US quantity	India price	India quantity	India margin	Indonesia price	Indonesia quantity	Indonesia margin
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	***	***	***	***	***	***	***	***

Period	Italy price	Italy quantity	Italy margin	Malaysia price	Malaysia quantity	Malaysia margin
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	***	***	***	***	***	***

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**Table V-9 Continued**

**Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source and quarter**

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

Period	US price	US quantity	Mexico price	Mexico quantity	Mexico margin	South Korea price	South Korea quantity	South Korea margin
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	***	***	***	***	***	***	***	***

Period	Taiwan price	Taiwan quantity	Taiwan margin	Thailand price	Thailand quantity	Thailand margin
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 on next page.



**Table V-9 Continued**

**Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source and quarter**

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

Period	US price	US quantity	Turkey price	Turkey quantity	Turkey margin	United Arab Emirates price	United Arab Emirates quantity	United Arab Emirates margin
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	***	***	***	***	***	***	***	***

Period	Vietnam price	Vietnam quantity	Vietnam margin	All subject price	All subject quantity	All subject margin
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: Window Treatments, including Vertical Blinds and Shades, Painted Finish, Alloy in the 6000 series – Size: CCD: 1.0” to 6.0”, Weight: 0.20 lb/ft to 2.0 lb/ft.

**Figure V-8**  
**Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, by source and quarter**

**Price of product 4**

\* \* \* \* \*

**Volume of product 4**

\* \* \* \* \*

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

Note: Product 4: Window Treatments, including Vertical Blinds and Shades, Painted Finish, Alloy in the 6000 series – Size: CCD: 1.0” to 6.0”, Weight: 0.20 lb/ft to 2.0 lb/ft.

**Figure V-9**

**Aluminum extrusions: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, data combined for all subject countries, by source and quarter**

**Price of product 4**

\* \* \* \* \*

**Volume of product 4**

\* \* \* \* \*

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

Note: Product 4: Window Treatments, including Vertical Blinds and Shades, Painted Finish, Alloy in the 6000 series – Size: CCD: 1.0” to 6.0”, Weight: 0.20 lb/ft to 2.0 lb/ft.

## Price trends

In general, prices increased during January 2020-June 2023. Table V-10 summarizes the price trends, by country and by product. As shown in the table, domestic price increases ranged from \*\*\* to \*\*\* percent during January 2020-June 2023 while import price increases for individual countries ranged from \*\*\* to \*\*\* percent. (There was one decrease, of \*\*\* percent, for product \*\*\*).

**Table V-10**  
**Aluminum extrusions: Summary of price data, by product and source, January 2020-June 2023**

Quantity in pounds, price in dollars per pound, change in percent

Product	Source	Number of quarters	Volume of shipments	Low price	High price	First quarter price	Last quarter price	Change over period
Product 1	United States	***	***	***	***	***	***	***
Product 1	China, subject	***	***	***	***	***	***	***
Product 1	Colombia	***	***	***	***	***	***	***
Product 1	Dominican Republic	***	***	***	***	***	***	***
Product 1	Ecuador	***	***	***	***	***	***	***
Product 1	India	***	***	***	***	***	***	***
Product 1	Indonesia	***	***	***	***	***	***	***
Product 1	Italy	***	***	***	***	***	***	***
Product 1	Malaysia	***	***	***	***	***	***	***
Product 1	Mexico	***	***	***	***	***	***	***
Product 1	South Korea	***	***	***	***	***	***	***
Product 1	Taiwan	***	***	***	***	***	***	***
Product 1	Thailand	***	***	***	***	***	***	***
Product 1	Turkey	***	***	***	***	***	***	***
Product 1	United Arab Emirates	***	***	***	***	***	***	***
Product 1	Vietnam	***	***	***	***	***	***	***
Product 1	Subject sources	***	***	***	***	***	***	***

Table continued on next page.

**Table V-10 Continued**

**Aluminum extrusions: Summary of price data, by product and source, January 2020-June 2023**

Quantity in pounds, price in dollars per pound, change in percent

Product	Source	Number of quarters	Volume of shipments	Low price	High price	First quarter price	Last quarter price	Change over period
Product 2	United States	***	***	***	***	***	***	***
Product 2	China, subject	***	***	***	***	***	***	***
Product 2	Colombia	***	***	***	***	***	***	***
Product 2	Dominican Republic	***	***	***	***	***	***	***
Product 2	Ecuador	***	***	***	***	***	***	***
Product 2	India	***	***	***	***	***	***	***
Product 2	Indonesia	***	***	***	***	***	***	***
Product 2	Italy	***	***	***	***	***	***	***
Product 2	Malaysia	***	***	***	***	***	***	***
Product 2	Mexico	***	***	***	***	***	***	***
Product 2	South Korea	***	***	***	***	***	***	***
Product 2	Taiwan	***	***	***	***	***	***	***
Product 2	Thailand	***	***	***	***	***	***	***
Product 2	Turkey	***	***	***	***	***	***	***
Product 2	United Arab Emirates	***	***	***	***	***	***	***
Product 2	Vietnam	***	***	***	***	***	***	***
Product 2	Subject sources	***	***	***	***	***	***	***

Table continued on next page.

**Table V-10 Continued**  
**Aluminum extrusions: Summary of price data, by product and source, January 2020-June 2023**

Quantity in pounds, price in dollars per pound, change in percent

Product	Source	Number of quarters	Volume of shipments	Low price	High price	First quarter price	Last quarter price	Change over period
Product 3	United States	***	***	***	***	***	***	***
Product 3	China, subject	***	***	***	***	***	***	***
Product 3	Colombia	***	***	***	***	***	***	***
Product 3	Dominican Republic	***	***	***	***	***	***	***
Product 3	Ecuador	***	***	***	***	***	***	***
Product 3	India	***	***	***	***	***	***	***
Product 3	Indonesia	***	***	***	***	***	***	***
Product 3	Italy	***	***	***	***	***	***	***
Product 3	Malaysia	***	***	***	***	***	***	***
Product 3	Mexico	***	***	***	***	***	***	***
Product 3	South Korea	***	***	***	***	***	***	***
Product 3	Taiwan	***	***	***	***	***	***	***
Product 3	Thailand	***	***	***	***	***	***	***
Product 3	Turkey	***	***	***	***	***	***	***
Product 3	United Arab Emirates	***	***	***	***	***	***	***
Product 3	Vietnam	***	***	***	***	***	***	***
Product 3	Subject sources	***	***	***	***	***	***	***

Table continued on next page.

**Table V-10 Continued**  
**Aluminum extrusions: Summary of price data, by product and source, January 2020-June 2023**

Quantity in pounds, price in dollars per pound, change in percent

Product	Source	Number of quarters	Volume of shipments	Low price	High price	First quarter price	Last quarter price	Change over period
Product 4	United States	***	***	***	***	***	***	***
Product 4	China, subject	***	***	***	***	***	***	***
Product 4	Colombia	***	***	***	***	***	***	***
Product 4	Dominican Republic	***	***	***	***	***	***	***
Product 4	Ecuador	***	***	***	***	***	***	***
Product 4	India	***	***	***	***	***	***	***
Product 4	Indonesia	***	***	***	***	***	***	***
Product 4	Italy	***	***	***	***	***	***	***
Product 4	Malaysia	***	***	***	***	***	***	***
Product 4	Mexico	***	***	***	***	***	***	***
Product 4	South Korea	***	***	***	***	***	***	***
Product 4	Taiwan	***	***	***	***	***	***	***
Product 4	Thailand	***	***	***	***	***	***	***
Product 4	Turkey	***	***	***	***	***	***	***
Product 4	United Arab Emirates	***	***	***	***	***	***	***
Product 4	Vietnam	***	***	***	***	***	***	***
Product 4	Subject sources	***	***	***	***	***	***	***

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.

Note: Percent change column is percentage change from the first quarter 2020 to the second quarter of 2023.

## Price comparisons

As shown in tables V-11 and V-12, prices for product imported from subject countries were below those for U.S.-produced product in 92 of 187 instances (50.8 million pounds); margins of underselling ranged from 0.3 to 72.1 percent. In the remaining 95 instances (17.0 million pounds), prices for product from the various subject countries were between 2.0 and 859.9 percent above prices for the domestic product.

**Table V-11**  
**Aluminum extrusions: Instances of underselling and overselling and the range and average of margins, by product**

Quantity in pounds; margin in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	19	***	***	***	***
Product 2	Underselling	55	***	***	***	***
Product 3	Underselling	6	***	***	***	***
Product 4	Underselling	12	***	***	***	***
Total, all products	Underselling	92	50,832,169	23.6	0.3	72.1
Product 1	Overselling	52	***	***	***	***
Product 2	Overselling	6	***	***	***	***
Product 3	Overselling	8	***	***	***	***
Product 4	Overselling	29	***	***	***	***
Total, all products	Overselling	95	17,035,286	(101.6)	(2.0)	(859.9)

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: Excluding data for product from the Dominican Republic, there were \*\*\*.

Note: \*\*\*.



**Table V-12****Aluminum extrusions: Instances of underselling and overselling and the range and average of margins, by source**

Quantity in pounds; margin in percent

Sources	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
China, subject	Underselling	---	***	***	***	***
Colombia	Underselling	---	***	***	***	***
Dominican Republic	Underselling	---	***	***	***	***
Ecuador	Underselling	10	***	***	***	***
India	Underselling	---	***	***	***	***
Indonesia	Underselling	13	***	***	***	***
Italy	Underselling	---	***	***	***	***
Malaysia	Underselling	25	***	***	***	***
Mexico	Underselling	17	***	***	***	***
South Korea	Underselling	4	***	***	***	***
Taiwan	Underselling	---	***	***	***	***
Thailand	Underselling	---	***	***	***	***
Turkey	Underselling	19	***	***	***	***
United Arab Emirates	Underselling	4	***	***	***	***
Vietnam	Underselling	---	***	***	***	***
All subject sources	Underselling	92	50,832,169	23.6	0.3	72.1

Table continued on next page.

**Table V-12 Continued****Aluminum extrusions: Instances of underselling and overselling and the range and average of margins, by source**

Quantity in pounds; margin in percent

Sources	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
China, subject	Overselling	---	***	***	***	***
Colombia	Overselling	---	***	***	***	***
Dominican Republic	Overselling	1	***	***	***	***
Ecuador	Overselling	4	***	***	***	***
India	Overselling	---	***	***	***	***
Indonesia	Overselling	13	***	***	***	***
Italy	Overselling	7	***	***	***	***
Malaysia	Overselling	1	***	***	***	***
Mexico	Overselling	11	***	***	***	***
South Korea	Overselling	---	***	***	***	***
Taiwan	Overselling	12	***	***	***	***
Thailand	Overselling	---	***	***	***	***
Turkey	Overselling	34	***	***	***	***
United Arab Emirates	Overselling	6	***	***	***	***
Vietnam	Overselling	6	***	***	***	***
All subject sources	Overselling	95	17,035,286	(101.6)	(2.0)	(859.9)

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

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

**Lost sales and lost revenue**

Of the 28 responding U.S. producers, 21 reported that they had to either reduce prices or roll back announced price increases, and 23 firms reported that they had lost sales. Fourteen U.S. producers<sup>4</sup> submitted lost sales and lost revenue allegations. The 14 responding U.S. producers identified over 100 firms with which they lost sales or revenue, with over 320 million pounds of alleged lost sales worth over \$800 million.

Staff contacted approximately 100 purchasers and received responses from 21 purchasers. Responding purchasers reported purchasing almost 2 million pounds of aluminum extrusions during January 2020-June 2023 (table V-13).

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

During 2022, responding purchasers purchased 55.9 percent from U.S. producers, 14.2 percent from China (subject imports), 7.7 percent from Mexico, 5.3 percent from Vietnam, 3.6 percent from Taiwan, 2.4 percent from nonsubject countries, and 5.7 percent from “unknown source” countries. For all other individual subject-country sources, purchasers reported purchasing less than one percent of their 2022 purchases from each source.

Of the 20 responding purchasers, 16 reported that, since 2020, they had purchased imported aluminum extrusions from subject countries instead of U.S.-produced product. Fourteen of these purchasers reported that subject import prices were lower than U.S.-produced product, and five of these purchasers reported that price was a primary reason for the decision to purchase imported product (from China, Indonesia, Mexico, Taiwan, and Thailand) rather than U.S.-produced product. These five purchasers estimated the quantity of aluminum extrusions from subject countries purchased instead of domestic product; quantities ranged from 20 to 1,292 tons (tables V-14 and V-15). However, three of these purchasers added that there were also other reasons besides price (such as stating that \*\*\*) for purchasing subject product.

Purchasers identified U.S. supply constraints, U.S. producers’ lead times, and quality as non-price reasons for purchasing imported rather than U.S.-produced product.

Of the 19 responding purchasers, none reported that U.S. producers had reduced prices in order to compete with lower-priced imports from subject countries; one reported that it did not know (table V-16). (One firm noted that a U.S. producer had offered \*\*\* percent reduction \*\*\*, but the firm added that it did not know why the U.S. producer had done so.)



**Table V-14**

**Aluminum extrusions: Purchasers' responses to purchasing subject imports instead of domestic product, by firm**

Quantity in short tons

<b>Purchaser</b>	<b>Purchased subject imports instead of domestic</b>	<b>Imports priced lower</b>	<b>Choice based on price</b>	<b>Quantity</b>	<b>Explanation</b>
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued on next page.

**Table V-14 Continued**

**Aluminum extrusions: Purchasers' responses to purchasing subject imports instead of domestic product, by firm**

Quantity in short tons

<b>Purchaser</b>	<b>Purchased subject imports instead of domestic</b>	<b>Imports priced lower</b>	<b>Choice based on price</b>	<b>Quantity</b>	<b>Explanation</b>
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued on next page.

**Table V-14 Continued**

**Aluminum extrusions: Purchasers' responses to purchasing subject imports instead of domestic product, by firm**

Quantity in short tons

<b>Purchaser</b>	<b>Purchased subject imports instead of domestic</b>	<b>Imports priced lower</b>	<b>Choice based on price</b>	<b>Quantity</b>	<b>Explanation</b>
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued on next page.

**Table V-14 Continued**  
**Aluminum extrusions: Purchasers' responses to purchasing subject imports instead of domestic product, by firm**

Quantity in short tons

<b>Purchaser</b>	<b>Purchased subject imports instead of domestic</b>	<b>Imports priced lower</b>	<b>Choice based on price</b>	<b>Quantity</b>	<b>Explanation</b>
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All firms	Yes--16; No--4	Yes--14; No--3	Yes--5; No--11	***	NA

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



**Table V-15****Aluminum extrusions: Purchasers' responses to purchasing subject imports instead of domestic product, by source**

Count in number of firms reporting, quantity in short tons

<b>Source</b>	<b>Count of purchasers reporting subject instead of domestic</b>	<b>Count of purchasers reported that imports were priced lower</b>	<b>Count of purchasers reporting that price was a primary reason for shift</b>	<b>Quantity</b>
China, subject	6	5	2	***
Colombia	1	1	---	***
Dominican Republic	3	3	---	***
Ecuador	2	2	---	***
India	5	5	*---	***
Indonesia	5	5	1	***
Italy	1	1	---	***
Malaysia	1	1	---	***
Mexico	7	5	1	***
South Korea	2	---	---	***
Taiwan	4	3	1	***
Thailand	3	2	1	***
Turkey	3	3	1	***
United Arab Emirates	3	1	---	***
Vietnam	6	5	---	***
Subject sources	16	14	5	***

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



increased and decreased purchases, each from a subject country. Overall, purchasers reported 38 increases of purchases from subject countries and 21 decreases. Reasons for purchasers increasing purchases of subject imports included an increase in demand for housing renovations during the COVID-19 pandemic, diversifying supply, difficulty obtaining sufficient quantity of product from U.S. producers (including being placed on allocation by U.S. producers), and increased lead times from U.S. producers. Purchaser \*\*\* described purchasing from \*\*\* because of “great” quality at a “good” price. Reasons for purchasers decreasing purchases of subject imports included the section 232 tariffs (for subject China), a decline in consumer demand starting in 2022 and/or 2023, and increased lead times and/or freight costs.

**Table V-17**  
**Aluminum extrusions: Count of purchasers’ responses regarding changes in purchase patterns from U.S., subject, and nonsubject countries**

Source of purchases	Increased consistently	Increased with fluctuation	No change	Decreased with fluctuation	Decreased consistently	Did not purchase
United States	3	6	2	9	1	0
China, subject	0	3	3	2	2	8
Colombia	0	1	0	0	0	14
Dominican Republic	1	1	0	1	0	12
Ecuador	1	2	0	0	0	13
India	1	1	2	2	1	9
Indonesia	2	1	0	0	2	10
Italy	1	2	1	0	0	12
Malaysia	1	0	0	0	1	13
Mexico	5	4	0	0	0	9
South Korea	0	1	0	0	1	13
Taiwan	0	1	1	4	0	10
Thailand	0	1	1	3	0	11
Turkey	3	0	0	1	0	11
United Arab Emirates	0	1	1	0	0	12
Vietnam	0	4	0	1	0	9
China, nonsubject	0	1	2	0	1	10
All other sources	1	1	2	1	1	11
Sources unknown	0	0	0	1	0	14

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



# Part VI: Financial experience of the U.S. producers

## Background<sup>1</sup>

Twenty-seven U.S. producers reported usable financial results and related information on their U.S. aluminum extrusions operations.<sup>2</sup> The reported financial results are primarily based on information from accounting systems designed to generate/report overall financial results on a U.S. GAAP or IFRS basis and were reported for calendar-year or equivalent periods.<sup>3</sup> While the majority of U.S. producers are part of privately held companies, three U.S. producers (Bonnell, Hydro Extrusion, Hydro Precision), accounting for \*\*\* percent of the U.S. industry's total 2022 sales quantity, are part of publicly traded companies.<sup>4</sup>

As described in Part III of this report, U.S. producers reported various changes in their operations during the period, some company-specific (acquisition of existing facilities, establishment of greenfield operations, plant closings) and others more widespread (capacity expansions, production curtailments and workforce reductions, weather and pandemic-related production disruptions). While U.S. producers generally indicated that labor costs increased during the period (see *Cost of goods sold and gross profit or loss* section below), the extent that individual U.S. producers did or did not experience raw material supply issues may have been somewhat less uniform.<sup>5</sup>

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<sup>1</sup> The following abbreviations may be used in the tables and/or text of this section: generally accepted accounting principles ("GAAP"), International Financial Reporting Standards ("IFRS"), 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"), and return on assets ("ROA").

<sup>2</sup> \*\*\* did not report complete financial results information in their U.S. producer questionnaires and did not respond to staff requests that missing information be submitted. As a result, neither company is presented in this section of the staff report. USITC auditor preliminary-phase notes.

<sup>3</sup> While the majority of U.S. producers reported on a U.S. GAAP basis, \*\*\* reported on the basis of IFRS. \*\*\* reported its financial results on a tax-accrual basis. Most U.S. producers reported financial results for calendar-year periods or effective equivalents.

<sup>4</sup> Bonnell represents the Aluminum Extrusions segment of Tredegar Corp. Tredegar 2022 10-K, p. 1. Hydro Extrusion USA and Hydro Precision Tubing USA are both part of the Hydro Extrusions operating segment of Norsk Hydro. 2022 Norsk Hydro Annual Report, p. 132.

<sup>5</sup> At the staff conference and in petitioner's postconference brief, U.S. producers generally indicated there was no widespread shortage or supply issue related to raw material, specifically aluminum, during the period. Conference transcript, p. 110 (McEvoy, Massey, Hamilton). Petitioner's postconference brief, p. 23. \*\*\*. \*\*\* U.S. producer questionnaire, section II-2a.

Figure VI-1 presents firm-specific shares of total 2022 net sales quantity.

**Figure VI-1**  
**Aluminum extrusions: U.S. producers' share of net sales quantity in 2022, by firm**

\* \* \* \* \*

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

## Operations on Aluminum extrusions

Table VI-1 and table VI-2 present income-and-loss data for the U.S. producers' aluminum extrusions operations and corresponding changes in AUVs, respectively. Table VI-3 presents a variance analysis of the financial results.<sup>6</sup> Appendix G presents selected company-specific financial information.

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<sup>6</sup> The Commission's variance analysis is calculated in three parts: sales variance, COGS variance, and SG&A expenses variance. Each part consists of a price variance (in the case of the sales variance) or a cost or expense variance (in the case of the COGS and SG&A expenses variance), and a volume variance. The sales or cost/expense variance is calculated as the change in unit price or per-unit cost/expense times the new volume, while the volume variance is calculated as the change in volume times the old unit price or per-unit cost/expense. As summarized at the bottom of the variance analysis, the price variance is from sales, the cost/expense variance is the sum of those items from COGS and SG&A variances, respectively, and the volume variance is the sum of the volume components of the net sales, COGS, and SG&A expenses variances. The Commission's variance analysis is more meaningful when product mix remains the same throughout the period. As noted in the *Net sales* section below, most U.S. producers indicated that changes in product mix were not the primary factor explaining the pattern of average sales value during the period; the primary factor being changes in raw material cost and the corresponding pass through in aluminum extrusions sales value.

**Table VI-1****Aluminum extrusions: U.S. producers' results of operations, by item and period**

Quantity in short tons; Value in 1,000 dollars; Ratios in percent; Shares in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Total net sales	Quantity	1,200,761	1,362,095	1,340,972	715,281	617,678
Total net sales	Value	4,867,762	6,730,278	8,316,999	4,580,962	3,568,408
COGS: Raw materials	Value	2,484,771	3,858,407	4,984,739	2,841,255	1,968,219
COGS: Direct labor	Value	578,485	697,517	775,292	400,902	381,230
COGS: Other factory costs	Value	1,171,094	1,399,408	1,603,654	769,676	761,021
COGS: Total	Value	4,234,350	5,955,332	7,363,685	4,011,833	3,110,470
Gross profit or (loss)	Value	633,412	774,946	953,314	569,129	457,938
SG&A expenses	Value	300,196	347,945	404,155	200,076	204,376
Operating income or (loss)	Value	333,216	427,001	549,159	369,053	253,562
Interest expense	Value	***	***	***	***	***
All other expenses	Value	***	***	***	***	***
All other income	Value	***	***	***	***	***
Net income or (loss)	Value	315,161	399,661	525,497	357,020	232,365
Depreciation expense (included above)	Value	152,038	184,765	216,619	106,807	107,129
Estimated cash flow from operations	Value	467,199	584,426	742,116	463,827	339,494
COGS: Raw materials	Ratio to NS	51.0	57.3	59.9	62.0	55.2
COGS: Direct labor	Ratio to NS	11.9	10.4	9.3	8.8	10.7
COGS: Other factory costs	Ratio to NS	24.1	20.8	19.3	16.8	21.3
COGS: Total	Ratio to NS	87.0	88.5	88.5	87.6	87.2
Gross profit or (loss)	Ratio to NS	13.0	11.5	11.5	12.4	12.8
SG&A expenses	Ratio to NS	6.2	5.2	4.9	4.4	5.7
Operating income or (loss)	Ratio to NS	6.8	6.3	6.6	8.1	7.1
Net income or (loss)	Ratio to NS	6.5	5.9	6.3	7.8	6.5

Table continued.

**Table VI-1 Continued****Aluminum extrusions: U.S. producers' results of operations, by item and period**

Unit values in dollars per short ton; Count in number of firms reporting

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
COGS: Raw materials	Share	58.7	64.8	67.7	70.8	63.3
COGS: Direct labor	Share	13.7	11.7	10.5	10.0	12.3
COGS: Other factory costs	Share	27.7	23.5	21.8	19.2	24.5
COGS: Total	Share	100.0	100.0	100.0	100.0	100.0
Total net sales	Unit value	4,054	4,941	6,202	6,404	5,777
COGS: Raw materials	Unit value	2,069	2,833	3,717	3,972	3,186
COGS: Direct labor	Unit value	482	512	578	560	617
COGS: Other factory costs	Unit value	975	1,027	1,196	1,076	1,232
COGS: Total	Unit value	3,526	4,372	5,491	5,609	5,036
Gross profit or (loss)	Unit value	528	569	711	796	741
SG&A expenses	Unit value	250	255	301	280	331
Operating income or (loss)	Unit value	278	313	410	516	411
Net income or (loss)	Unit value	262	293	392	499	376
Operating losses	Count	2	2	4	4	4
Net losses	Count	2	4	6	5	8
Data	Count	27	27	27	27	27

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

Note: Ratios represent the ratio to net sales value and shares represent the share of COGS.

**Table VI-2****Aluminum extrusions: Changes in AUVs between comparison periods**

Changes in percent

Item	2020-22	2020-21	2021-22	Jan-Jun 2022-23
Total net sales	▲53.0	▲21.9	▲25.5	▼(9.8)
COGS: Raw materials	▲79.6	▲36.9	▲31.2	▼(19.8)
COGS: Direct labor	▲20.0	▲6.3	▲12.9	▲10.1
COGS: Other factory costs	▲22.6	▲5.3	▲16.4	▲14.5
COGS: Total	▲55.7	▲24.0	▲25.6	▼(10.2)

Table continued.



**Table VI-2 Continued**  
**Aluminum extrusions: Changes in AUVs between comparison periods**

Changes in dollars per short ton

Item	2020-22	2020-21	2021-22	Jan-Jun 2022-23
Total net sales	▲ 2,148	▲ 887	▲ 1,261	▼ (627)
COGS: Raw materials	▲ 1,648	▲ 763	▲ 885	▼ (786)
COGS: Direct labor	▲ 96	▲ 30	▲ 66	▲ 57
COGS: Other factory costs	▲ 221	▲ 52	▲ 168	▲ 156
COGS: Total	▲ 1,965	▲ 846	▲ 1,119	▼ (573)
Gross profit or (loss)	▲ 183	▲ 41	▲ 142	▼ (54)
SG&A expenses	▲ 51	▲ 5	▲ 46	▲ 51
Operating income or (loss)	▲ 132	▲ 36	▲ 96	▼ (105)
Net income or (loss)	▲ 129	▲ 31	▲ 98	▼ (123)

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 VI-3**  
**Aluminum extrusions: Variance analysis on the operations of the U.S. producers between comparison periods**

Value in 1,000 dollars

Item	2020-22	2020-21	2021-22	Jan-Jun 2022-23
Net sales price variance	2,880,836	1,208,485	1,691,092	(387,463)
Net sales volume variance	568,401	654,031	(104,371)	(625,091)
Net sales total variance	3,449,237	1,862,516	1,586,721	(1,012,554)
COGS cost variance	(2,634,897)	(1,152,056)	(1,500,707)	353,932
COGS volume variance	(494,438)	(568,926)	92,354	547,431
COGS total variance	(3,129,335)	(1,720,982)	(1,408,353)	901,363
Gross profit variance	319,902	141,534	178,368	(111,191)
SG&A cost variance	(68,906)	(7,415)	(61,606)	(31,601)
SG&A volume variance	(35,053)	(40,334)	5,396	27,301
SG&A total variance	(103,959)	(47,749)	(56,210)	(4,300)
Operating income price variance	2,880,836	1,208,485	1,691,092	(387,463)
Operating income cost variance	(2,703,802)	(1,159,470)	(1,562,313)	322,331
Operating income volume variance	38,909	44,771	(6,622)	(50,359)
Operating income total variance	215,943	93,785	122,158	(115,491)

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

## Net sales

Commercial sales accounted for most of the U.S. industry's total sales during the period (\*\*\*) percent on a cumulative basis) with internal consumption (\*\*\*) percent) and transfer sales to related firms (\*\*\*) percent) accounting for relatively small shares.<sup>7</sup> A limited amount of tolling activity was also reported.<sup>8</sup> Given the predominance of commercial sales a single line item for total sales is presented in the relevant tables above.

The sales value of aluminum extrusions generally reflects a combination of a direct pass through of aluminum costs (metal component) and an agreed to conversion price.<sup>9</sup> In sales contracts or other types of sales agreements, the metal component is adjusted on a monthly basis to reflect the current LME price, which itself changes on a daily basis.<sup>10</sup> Reflecting the

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<sup>7</sup> \*\*\*. Email with attachments from \*\*\* to USITC staff, October 30, 2023. \*\*\*. Ibid. \*\*\*. Email with attachments from \*\*\* to USITC staff, October 30, 2023. \*\*\*. Email with attachments from \*\*\* to USITC staff, October 30, 2023. Relatively small amounts of internal consumption were reported by \*\*\*. Email with attachments from \*\*\* to USITC staff, October 30, 2023. Email from \*\*\* to USITC staff. \*\*\* did not respond to a staff request that it describe its reported internal consumption.

<sup>8</sup> With regard to U.S. producers whose financial results are presented in this section, tolling activity was specifically reported by \*\*\*. Email with attachments from \*\*\* to USITC staff, October 30, 2023. \*\*\* U.S. producer questionnaires, section II-6.

<sup>9</sup> Conference transcript, pp. 115-116 (Hamilton), p. 116 (Massey), pp.116-117 (Dillett), p. 117 (McEvoy, Adams).

<sup>10</sup> Conference transcript, p. 124 (DeFrancesco).

underlying aluminum extrusion, as well as other features such as the degree of fabrication and finishing, the conversion price attempts to incorporate/reflect the U.S. producer's expected volume and associated manufacturing efficiencies over the period of the agreement.<sup>11</sup> While U.S. producers indicated that the metal component of sales price and the actual cost of raw material usually wind up matching relatively closely, there are periods when the two are less in sync.<sup>12</sup>

## Quantity

On an overall basis the U.S. industry reported an increase in total sales quantity in 2021 followed by a decline in 2022, and lower total sales quantity in January-June 2023 compared to January-June 2022. On a company-specific basis most U.S. producers reported higher sales quantity in 2021 and lower sales quantity in January-June 2023 compared to January-June 2022, while in 2022 the pattern was more directionally mixed (see table G-1). \*\*\*, two of the three U.S. producers reporting increases in sales quantity in January-

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<sup>11</sup> Conference transcript, pp. 120-121 (Massey), p. 120 (Dillett), p. 122 (Adams). As described by a Bonnell company official, "The other thing to consider from sort of a bigger picture perspective is that you've got fixed costs, whether it's maintenance, insurance, overhead, taxes and so forth. Obviously, as the volume in a facility goes down, those costs on a per-order basis go up and have an impact on your conversion cost, notwithstanding the fact that you might have . . . offered that to the customer for a longer period of time on a price point." Conference transcript, p. 122 (Hamilton).

<sup>12</sup> As described by a Bonnell company official, ". . . there can be timing issues if the price is, the LME price is rising dramatically or falling dramatically depending on when . . . the order is placed and the order is shipped. There can be mismatches that we highlight in our financial statements as a . . . revaluation of our inventory and things of that nature, but that certainly can have an impact. But, generally speaking, it doesn't." Conference transcript, p. 123 (Hamilton). Similarly, a Custom Aluminum company official stated "We do buy aluminum on a prior month index, and we also sell that aluminum on a prior month index, so we're really trying to capture . . . as little difference as possible. And the only difference is in inventory. During that particular period that we're looking at, though, we were more likely to have lower inventories, so there really is less . . . chance of there to be . . . a mismatch." Conference transcript, p. 125. \*\*\*. Email with attachments from \*\*\* to USITC staff, October 30, 2023. \*\*\*. Email with attachments from \*\*\* to USITC staff, October 30, 2023.

June 2023, were the \*\*\* U.S. producers reporting increases in sales quantity throughout the period.<sup>13</sup>

## Value

The U.S. industry's total sales value increased during the full-year period and was lower in January-June 2023 compared to January-June 2022. As shown in the sales section of the variance analysis (table VI-3), increases in the U.S. industry's total sales value during the full-year period were either due principally (2020-21) or entirely (2021-22) to positive price variances, while lower total sales value in January-June 2023 compared to January-June 2022 was due to a negative price variance and a somewhat larger negative sales volume variance. Consistent with the raw material pass through described previously, table VI-2 shows that overall changes in average sales value and raw material costs, while of differing magnitudes, were directionally the same throughout the period: increasing during the full-year period and lower in January-June 2023 compared to January-June 2022.

The relatively wide range of average sales values reported by U.S. producers appears to be consistent with differences in the types of aluminum extrusions being sold and the degree/complexity of further fabrication and finishing (see table G-1).<sup>14</sup> On a company-specific basis U.S. producers, almost without exception, reported increases in average sales value during the full-year period followed by lower average sales values in January-June 2023 compared to January-June 2022.<sup>15</sup> While most U.S. producers indicated that changes in the

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<sup>13</sup> Of the \*\*\* U.S. producers (\*\*\*) reporting higher total sales quantity in January-June 2023 compared to January-June 2022, \*\*\* reported the largest increase, noting \*\*\*. Email with attachment from \*\*\* to USITC staff, October 24, 2023.

<sup>14</sup> \*\*\* (see table G-1). As described by a Custom Aluminum company official, "All extrusions are generally priced on their weight, production speed, and then additional fabrication and finishing requirements. Our heat sinks tend to be similar in weight and production speed to our other extrusions, so they're priced similarly. Certain price differences result from fabrication processes. For example, heat sinks may require hulls for mounting of other components, but this is no different than other things that we make, like housings for military communication devices or columns for medical carts, both of which require high degrees of fabrication for mating components." Conference transcript, p. 41 (Dillett). \*\*\*.

<sup>15</sup> \*\*\* reported a modest decline in its average sales value in 2021 (table G-1).

metal component of sales value explains most of the directional pattern of average sales value during the period, several noted that product mix was also a factor.<sup>16</sup>

## **Cost of goods sold and gross profit or loss**

As described in Part I of this report, U.S. producers can be grouped into integrated producers with cast houses that produce alloy aluminum billet,<sup>17</sup> and non-integrated producers that purchase aluminum billets from third parties. With regard to the U.S. producers whose financial results are presented in this section of the report, \*\*\* (\*\*\*) confirmed that they operate cast houses and are integrated producers; \*\*\* (\*\*\*) confirmed that they operate non-integrated facilities.<sup>18</sup>

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<sup>16</sup> In some instances the company-specific changes in product mix reflected a declining share of aluminum extrusions sales to specific sectors. \*\*\*. Email with attachments from \*\*\* to USITC staff, October 30, 2023. \*\*\*. Email with attachment from \*\*\* to USITC staff, October 25, 2023. \*\*\*. Email with attachments from \*\*\* to USITC staff, October 30, 2023. In other instances, the underlying aluminum extrusions sold changed. \*\*\*. Email with attachment from \*\*\* to USITC staff, October 26, 2023. \*\*\*. Email with attachments from \*\*\* to USITC staff, October 30, 2023.

<sup>17</sup> Conference transcript, pp. 129-130 (DeFrancesco). Integrated producers also source billets from third parties. Ibid. While integrated production can provide a raw material cost advantage and reduce dependency on outside sources for the alloy aluminum, it requires a certain scale of production to justify. Conference transcript, p. 129 (Massey, McEvoy, Dillett). \*\*\*. Email with attachment from \*\*\* to USITC staff, October 30, 2023. The range of underlying aluminum extrusions that can be produced is reportedly not impacted by integrated versus non-integrated production. Conference transcript, p. 131 (Hamilton).

<sup>18</sup> USITC auditor preliminary-phase notes.

While \*\*\* did not respond to staff follow-up questions regarding their status, they are most likely non-integrated producers.<sup>19</sup>

## Raw materials

Total raw material cost, the largest primary component of aluminum extrusions COGS, accounted for 58.7 percent of total COGS (2020) to 70.8 percent (January-June 2022). While ultimately reflecting costs primarily associated with aluminum and alloys, company-specific raw material costs vary according to production methods and level of integration.<sup>20</sup> On an overall and company-specific basis average raw material cost increased during the full-year period and was lower in January-June 2023 compared to January-June 2022. With the exception of \*\*\*, which reported a modest decline in its average raw material cost in 2021, this pattern was reported by all U.S. producers (see table G-1).

Aluminum scrap, which can be generated at various stages of the production process, is generally remelted, if the U.S. producer is integrated, or shipped back to the billet supplier for an offset to billet price.<sup>21</sup> Non-integrated producer \*\*\* reported that it

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<sup>19</sup> \*\*\* U.S. producer questionnaires, section III-9e.

<sup>20</sup> As described by petitioner in its postconference brief, “As aluminum is a globally traded commodity, the price of primary aluminum or aluminum billet is agnostic to the source. Specifically, nearly all aluminum is priced on the London Market Exchange (“LME”). And all unwrought aluminum uses the following pricing formula: LME cash settlement price for the underlying aluminum + regional delivery premium. Alloyed unwrought aluminum like billets are priced according to the same formula but with a billet surcharge, *i.e.*, LME cash settlement price + regional delivery premium + billet premium. Therefore, Canadian or UAE primary aluminum carry the same price regardless. More importantly, the billet that a consumer, such as an aluminum extruder buys, is priced the same way regardless of whether it is 80% primary and 20% scrap, or 80% scrap and 20% primary. The price of the billet is LME + Midwest Premium + billet surcharge. Accordingly, the price of the primary aluminum for extruders with cast houses would remain generally the same regardless of whether the source was domestic or outside the United States.” Petitioner’s postconference brief (Exhibit 1), p. 77 (cites omitted). Also according to petitioner, “The large majority of U.S. extruders’ unwrought aluminum needs – including ingots for extruders with cast houses, and billet for those without – is served by the United States and Canada.” Petitioner’s postconference brief (Exhibit 1), p. 69.

<sup>21</sup> Conference transcript, p. 127 (Massey, Hamilton). Conference transcript, p. 128 (DeFrancesco). As it relates to this point and as described by \*\*\*. Email with attachment from \*\*\* to USITC staff, October 24, 2023. \*\*\*. Email with attachment from \*\*\* to USITC staff, October 26, 2023. Note: The sale of scrap can also be included in other income and not reflected (directly or indirectly) in COGS. Email with attachments from \*\*\* to USITC staff, October 30, 2023.

also purchases and aggregates scrap, which it either sells or has tolled processed into recycled billet.<sup>22</sup>

### **Direct labor cost and other factory costs**

Direct labor, the smallest primary component of aluminum extrusions COGS, ranged from 10.0 percent of COGS (January-June 2022) to 13.7 percent (2020). On an overall and, for the most part, company-specific basis, average direct labor costs increased during the full-year period and were higher in January-June 2023 compared to January-June 2022. In at least some instances, the pattern of higher company-specific average direct labor cost reflects a combination of higher wages and related factors such as overtime pay and changes in product mix.<sup>23 24</sup> In contrast with most U.S. producers that were asked to comment on the pattern of their average direct labor cost, \*\*\* stated that its total direct labor cost remained relatively constant during the period and that increases in average direct labor primarily reflect reduced production volume.<sup>25</sup>

From an operational standpoint labor cost can reflect various activities, including the upstream cast house, to the extent the U.S. producer is integrated, as well as the extrusion press operations, common to all U.S. producers, and varying levels of fabrication and finishing. As shown in table G-1, U.S. producers reported a range of average direct labor costs with \*\*\* and \*\*\* reporting the highest and lowest average direct labor cost, respectively. As noted above, both are non-integrated producers.

Other factory costs, the second largest primary component of aluminum extrusions COGS ranged from 19.2 percent of COGS (January-June 2022) to 27.7 percent (2020). The relatively large share of COGS accounted for by other factory costs is consistent with a capital

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<sup>22</sup> Email with attachments from \*\*\* to USITC staff, October 30, 2023.

<sup>23</sup> \*\*\*. Email with attachment from \*\*\* to USITC staff, October 30, 2023. \*\*\*. Email with attachments from \*\*\* to USITC staff, October 30, 2023.

<sup>24</sup> \*\*\*. Email with attachment from \*\*\* to USITC staff, October 26, 2023.

<sup>25</sup> Email with attachment from \*\*\* to USITC staff, October 30, 2023.

intensive manufacturing process.<sup>26</sup> As the non-material and non-labor component of COGS, other factory costs is a broad category, including a number of costs/expenses, which, in terms of their connection to underlying production or other relevant activity, can be variable, fixed, or mixed (possessing variable and fixed components).<sup>27</sup> While integrated and non-integrated operations engage in many of the same production activities, integrated producers with cast houses, all things being equal, incur higher fixed costs as compared to non-integrated producers.<sup>28</sup>

On an overall basis average other factory costs increased modestly in 2021, by a larger amount in 2022, and were higher in January-June 2023 compared to January-June 2022 (see table VI-2). On a company-specific basis the directional pattern of average other factory costs was mixed in 2021 (less than two thirds of U.S. producers reporting increases in average other factory costs and the rest declines) but more uniform in 2022 and between the interim periods (a substantial majority of U.S. producers reporting increases). U.S. producers that were asked to explain the pattern of their higher average other factory costs noted higher costs associated with a range of inputs,<sup>29</sup> the installation of equipment and subsequent increased depreciation

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<sup>26</sup> Conference transcript, p. 51 (Kaplan).

<sup>27</sup> Most U.S. producers reported depreciation expense in other factory costs and to a lesser extent in SG&A expenses. In response to staff follow-up requests, U.S. producers that originally reported depreciation expense in other expenses, i.e., below operating results, reclassified it to other factory costs in COGS. USITC auditor preliminary-phase notes. \*\*\*. Ibid.

<sup>28</sup> Petitioner's postconference brief, p. 76. \*\*\*. Email with attachment from \*\*\* to USITC staff, October 30, 2023.

<sup>29</sup> \*\*\*. Email with attachment from \*\*\* to USITC staff, October 24, 2023. \*\*\*. Email with attachment from \*\*\* to USITC staff, October 30, 2023. \*\*\*. Email with attachments from \*\*\* to USITC staff, October 30, 2023.



expense,<sup>30</sup> the inclusion of mark to market metal holding gains,<sup>31</sup> and/or a combination of factors.<sup>32</sup> \*\*\*, similar to direct labor, indicated that its total factory costs remained relatively constant during the period, attributing the increase in average other factory costs to reduced volume.<sup>33</sup>

### **Total cost of goods sold**

As a result of the above-noted increases in raw material, direct labor, and other factory costs, the U.S. industry's average COGS increased during the full-year period. In January-June 2023 compared to January-June 2022 lower average raw material cost yielded lower average COGS, more than offsetting higher corresponding average direct labor and other factory costs.

### **Gross profit or loss**

The U.S. industry's total gross profit increased during the full-year period, reaching its highest level in 2022 (full year), and then was lower in January-June 2023 compared to January-June 2022. Directionally, most U.S. producers reported higher total gross profit in 2021, while the pattern was more mixed in 2022 with only somewhat over half of U.S. producers reporting an increase in gross profit. With several exceptions, the majority of U.S. producers reported lower total gross profit in January-June 2023 compared to January-June 2022. \*\*\*, which reported a much higher level of gross profit in January-June 2023 compared to January-June 2022, was a notable exception (see table G-1).<sup>34</sup>

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<sup>30</sup> Email with attachment from \*\*\* to USITC staff, October 23, 2023.

<sup>31</sup> Email with attachment from \*\*\* to USITC staff, October 25, 2023.

<sup>32</sup> \*\*\*. Email with attachment from \*\*\* to USITC staff, October 26, 2023. \*\*\*. Email with attachment from \*\*\* to USITC staff, October 30, 2023. \*\*\*. Email with attachments from \*\*\* to USITC staff, October 30, 2023.

<sup>33</sup> Email with attachment from \*\*\* to USITC staff, October 30, 2023.

<sup>34</sup> \*\*\*

(continued...)

As shown in table G-1 and in addition to individual U.S. producers reporting a relatively wide range of gross profit ratios (total gross profit or loss divided by total sales), the directional change in company-specific gross profit ratios was mixed in both 2021 (somewhat over half of U.S. producers reporting an increase in gross profit ratio) and in January-June 2023 compared to January-June 2022 (somewhat over half reporting a decline in gross profit ratio). In 2022, when the directional pattern was more uniform (somewhat over two thirds of U.S. producers reporting a decline in their gross profit ratios), (\*\*\*)<sup>35</sup>, the \*\*\* U.S. producers, reported modest increases in their gross profit ratios. This helps to explain why, despite the majority of U.S. producers reporting declines, the U.S. industry's gross profit ratio was essentially unchanged in 2022 as compared to 2021. At the end of the period, in contrast, \*\*\* reported a lower gross profit ratio in January-June 2023 compared to January-June 2022,<sup>35</sup> while \*\*\*, the larger of two producers, reported a higher gross profit ratio.<sup>36</sup> The remaining U.S. producers also reported a mixed directional pattern with the U.S. industry's gross profit ratio marginally higher in January-June 2023 compared to January-June

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\*\*\*. Email with attachments from \*\*\* to USITC staff, October 30, 2023.

<sup>35</sup> \*\*\*. Email with attachment from \*\*\* to USITC staff, October 24, 2023.

<sup>36</sup> \*\*\*. Email with attachment from \*\*\* to USITC staff, October 26, 2023. With regard to the first explanatory factor noted above, a higher gross profit ratio, all things being equal, would be generated when the raw material pass through component, reflected in the sales denominator, declines.

2022.<sup>37</sup> \*\*\*, in contrast to most U.S. producers, reported a notably higher gross profit ratio in January-June 2023 compared to January-June 2022 (see footnote 34).

To the extent that the U.S. industry's overall gross profit ratio remained within a relatively narrow range throughout the period, changes in total gross profit can be attributed largely to changes in total sales (increasing during the full-year period and lower in January-June 2023 compared to January-June 2022).

### **SG&A expenses and operating income or loss**

The U.S. industry's total SG&A expenses increased during the full-year period and were higher in January-June 2023 compared to January-June 2022. In conjunction with increases in total sales value during the full-year period, the corresponding SG&A expense ratio (total SG&A expenses divided by total net sales value), declined modestly. In January-June 2023 compared to January-June 2022 lower sales value and higher SG&A expenses yielded a somewhat higher SG&A expense ratio. Notwithstanding the relatively wide range of company-specific SG&A expense ratios (see table G-1), most followed the same overall directional pattern of declining SG&A expense ratios during the full-year period and higher SG&A expense ratios in January-June 2023 compared to January-June 2022.

In 2021 almost all U.S. producers reported higher operating income, while the pattern was more mixed in 2022 with somewhat over half of U.S. producers reporting declines. In

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<sup>37</sup> Among those U.S. producers reporting a modestly higher gross profit ratio at the end of the period, \*\*\* noted that this primarily reflects cost measures taken by the company. \*\*\*. Email with attachments from \*\*\* to USITC staff, October 30, 2023. \*\*\*, which reported a small decline in its gross profit ratio in January-June 2023 compared to January-June 2022, was the \*\*\* U.S. producer whose gross profit ratio increased in both 2021 and 2022. \*\*\*. Email with attachments from \*\*\* to USITC staff, October 30, 2023.

January-June 2023 compared to January-June 2022, the pattern was again more directionally uniform with most U.S. producers reporting lower operating income.

Like the pattern of gross profit and to the extent the U.S. industry's overall operating income ratio remained within a relatively narrow range throughout the period, changes in total operating income were largely a function of changes in total sales.<sup>38</sup> On a company-specific basis this observation would also be true for those U.S. producers that reported relatively stable operating income ratios. As shown in table G-1, however, U.S. producers reported a wide range of operating income or loss ratios with variability (positive and negative) ranging from relatively modest to pronounced.

### **Interest expense, other expenses and income, and net income or loss**

The U.S. industry's operating income and net income shared the same directional pattern throughout the period: increasing during the full-year period and lower in January-June 2023 compared to January-June 2022. As compared to operating income, the lower level of net income reflects the presence of interest expense and other expenses, both varying in terms of their relative importance during the period, which were partially offset by corresponding other income.

Most U.S. producers reported at least some level of interest expense during the period. Other expenses and other income, often but not always identified as non-recurring items, were reported by a somewhat smaller number of U.S. producers. The impact of other expenses on net income was largest in 2020 and 2021, when it exceeded corresponding interest expense. \*\*\* (2020 and 2021) and \*\*\* (2021) accounted for large company-specific shares of total other expenses.<sup>39 40</sup> While other income was also reported throughout

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<sup>38</sup> The modest decline in the U.S. industry's SG&A expense ratio during the full-year period partially offset the decline in gross profit ratio in 2021, limiting the reduction in corresponding 2021 operating income ratio, and more than offset the decline in gross profit ratio in 2022, resulting in a modest increase in corresponding 2022 operating income ratio. The opposite was true at the end of the period when the higher SG&A expense ratio in January-June 2023 compared to January-June 2022 more than offset a higher gross profit ratio, yielding a lower operating income ratio.

<sup>39</sup> \*\*\*. Email with attachment from \*\*\* to USITC staff, October 26, 2023. \*\*\* U.S. producer questionnaire, section III-10a-b. \*\*\*.

<sup>40</sup> \*\*\*. \*\*\* U.S. producer questionnaire, section III-10a-b. \*\*\*

(continued...)

the period, the largest total amount was reported in 2021 with \*\*\* accounting for \*\*\* percent and \*\*\* percent, respectively, of the other income reported in that year.<sup>41</sup>

While the U.S. industry as a whole generated net income throughout the period, a third of U.S. producers reported sporadic net losses or net losses throughout most or all of the period;<sup>42</sup> the remainder reported net income of varying magnitudes throughout the period (see table G-1).

## Capital expenditures and R&D expenses

Table VI-4 and table VI-6 present U.S. producers' capital expenditures and R&D expenses related to their aluminum extrusions operations, respectively, by firm. Table VI-5 and table VI-7 present corresponding narrative descriptions.

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<sup>41</sup> \*\*\*. \*\*\* U.S. producer questionnaire, section III-10a-b. \*\*\*. Email with attachments from \*\*\* to USITC staff, October 30, 2023. \*\*\*.

<sup>42</sup> \*\*\*. Email with attachments from \*\*\* to USITC staff, October 30, 2023. \*\*\*. Email from \*\*\* to USITC staff, October 30, 2023. \*\*\*. Email with attachment from \*\*\* to USITC staff, October 24, 2023.

**Table VI-4**  
**Aluminum extrusions: U.S. producers' capital expenditures, by firm and period**

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
All firms	201,674	305,038	318,658	141,118	116,077

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

Note: \*\*\*. USITC auditor preliminary-phase notes.

**Table VI-5**  
**Aluminum extrusions: U.S. producers' narrative descriptions of their capital expenditures, by firm**

Firm	Narrative on capital expenditures
Alexandria Industries	***
Aluminios de Puerto Rico	***
APEL Extrusions	***
Astro Shapes	***
Bonnell	***
Brazeway	***
Custom Aluminum	***
Dajcor	***
Elixir	***
Extrudex	***
Hydro Extrusion	***
Hydro Precision	***
International	***
Jordan	***
Keymark	***

Table continued.

**Table VI-5 Continued**

**Aluminum extrusions: U.S. producers' narrative descriptions of their capital expenditures, by firm**

<b>Firm</b>	<b>Narrative on capital expenditures</b>
M-D Building	***
Merit	***
Mi Metals	***
Momentum	***
PC Extrusions	***
Penn	***
Pennex	***
Pries	***
Sierra Aluminum	***
Tower Extrusions	***
Western Extrusions	***
Wolverine	***

Table continued.



**Table VI-5 Continued****Aluminum extrusions: U.S. producers' narrative descriptions of their capital expenditures, by firm**

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

Note: \*\*\*. USITC auditor preliminary-phase notes. \*\*\*. Email with attachments from \*\*\* to USITC staff, October 30, 2023. \*\*\*. Email with attachment from \*\*\* to USITC staff, October 26, 2023. \*\*\*. USITC auditor preliminary-phase notes.

**Table VI-6****Aluminum extrusions: 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>
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
All firms	***	***	***	***	***

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

**Table VI-7**  
**Aluminum extrusions: U.S. producers' narrative descriptions of their R&D expenses, by firm**

Firm	Narrative on R&D expenses
Alexandria Industries	***
Aluminios de Puerto Rico	***
APEL Extrusions	***
Astro Shapes	***
Bonnell	***
Brazeway	***
Custom Aluminum	***
Dajcor	***
Elixir	***
Extrudex	***
Hydro Extrusion	***
Hydro Precision	***
International Extrusions	***
Jordan	***
Keymark	***
M-D Building	***

Table continued.

**Table VI-7 Continued****Aluminum extrusions: U.S. producers' narrative descriptions of their R&D expenses, by firm**

<b>Firm</b>	<b>Narrative on R&amp;D expenses</b>
Merit	***
Mi Metals	***
Momentum	***
PC Extrusions	***
Penn	***
Pennex	***
Pries	***
Sierra Aluminum	***
Tower Extrusions	***
Western Extrusions	***
Wolverine	***

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

The U.S. industry's total capital expenditures increased during the full-year period and were lower in January-June 2023 compared to January-June 2022. \*\*\* accounted for the largest company-specific share of total capital expenditures throughout the period; the second largest company-specific shares of capital expenditures accounted for by \*\*\* in 2020, \*\*\* in 2021 through 2022 (full year and interim period), and \*\*\* in January-June 2023. While company-specific amounts and directional trends varied, almost all U.S. producers reported at least some capital expenditures during the period, the exception being \*\*\*, with just under three quarters reporting higher capital expenditures in 2022 compared to 2020.

Like capital expenditures, R&D expenses increased during the full-year period and were lower in January-June 2023 compared to January-June 2022. For most of the period and also like capital expenditures \*\*\* accounted for the largest company-specific share of R&D expenses, the exception being January-June 2023 when \*\*\* accounted for the largest share of R&D expenses.<sup>43</sup> The second largest company-specific shares of R&D

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43 \*\*\*

(continued...)

expenses were accounted for by \*\*\* in 2020, \*\*\* in 2021, \*\*\* in 2022 (full-year and interim period), and \*\*\* in January-June 2023. Unlike capital expenditures, the majority of U.S. producers did not report R&D expenses.

## Assets and ROA

Table VI-8 presents data on the U.S. producers' total assets and table VI-9 presents corresponding ROA.<sup>44</sup> Table VI-10 presents U.S. producers' narrative information regarding aspects of reported total asset information.

**Table VI-8**  
**Aluminum extrusions: U.S. producers' total net assets, by firm and period**

Value in 1,000 dollars

Firm	2020	2021	2022
Alexandria Industries	***	***	***
Aluminios de Puerto Rico	***	***	***
APEL Extrusions	***	***	***
Astro Shapes	***	***	***
Bonnell	***	***	***
Brazeway	***	***	***
Custom Aluminum	***	***	***
Dajcor	***	***	***
Elixir	***	***	***
Extrudex	***	***	***
Hydro Extrusion	***	***	***
Hydro Precision	***	***	***
International Extrusions	***	***	***
Jordan	***	***	***
Keymark	***	***	***
M-D Building	***	***	***
Merit	***	***	***
Mi Metals	***	***	***
Momentum	***	***	***
PC Extrusions	***	***	***
Penn	***	***	***
Pennex	***	***	***

Table continued.

\*\*\*.

<sup>44</sup> ROA is calculated here as operating results divided by total assets. With regard to a company's overall operations, staff notes that a total asset value (i.e., the bottom line value on the asset side of a company's balance sheet) reflects an aggregation of a number of current and non-current assets, which, in many instances, are not product specific. The ability of U.S. producers to assign total asset values to discrete product lines affects the meaningfulness of calculated operating return on net assets.

**Table VI-8 Continued****Aluminum extrusions: U.S. producers' total net assets, by firm and period**

Firm	2020	2021	2022
Pries	***	***	***
Sierra Aluminum	***	***	***
Tower Extrusions	***	***	***
Western Extrusions	***	***	***
Wolverine	***	***	***
All firms	2,383,780	3,104,479	3,307,753

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

**Table VI-9****Aluminum extrusions: U.S. producers' ROA, by firm and period**

Ratios in percent

Firm	2020	2021	2022
Alexandria Industries	***	***	***
Aluminios de Puerto Rico	***	***	***
APEL Extrusions	***	***	***
Astro Shapes	***	***	***
Bonnell	***	***	***
Brazeway	***	***	***
Custom Aluminum	***	***	***
Dajcor	***	***	***
Elixir	***	***	***
Extrudex	***	***	***
Hydro Extrusion	***	***	***
Hydro Precision	***	***	***
International Extrusions	***	***	***
Jordan	***	***	***
Keymark	***	***	***
M-D Building	***	***	***
Merit	***	***	***
Mi Metals	***	***	***
Momentum	***	***	***
PC Extrusions	***	***	***
Penn	***	***	***
Pennex	***	***	***
Pries	***	***	***
Sierra Aluminum	***	***	***
Tower Extrusions	***	***	***
Western Extrusions	***	***	***
Wolverine	***	***	***
All firms	14.0	13.8	16.6

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

**Table VI-10****Aluminum extrusions: U.S. producers' narrative description of their total net assets, by firm**

<b>Firm</b>	<b>Narrative on assets</b>
Alexandria Industries	***
Aluminios de Puerto Rico	***
APEL Extrusions	***
Astro Shapes	***
Bonnell	***
Brazeway	***
Custom Aluminum	***
Dajcor	***
Elixir	***
Extrudex	***
Hydro Extrusion	***
Hydro Precision	***
International Extrusions	***
Jordan	***
Keymark	***
M-D Building	***
Merit	***

Table continued.

**Table VI-10 Continued**

**Aluminum extrusions: U.S. producers' narrative description of their total net assets, by firm**

<b>Firm</b>	<b>Narrative on assets</b>
Mi Metals	***
Momentum	***
PC Extrusions	***
Penn	***
Pennex	***
Pries	***
Sierra Aluminum	***
Tower Extrusions	***
Western Extrusions	***
Wolverine	***

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

Note: \*\*\*. Email with attachment from \*\*\* to USITC staff, October 30, 2023.

## **Capital and investment**

The Commission requested the U.S. producers to describe any actual or potential negative effects of imports of aluminum extrusions from China, Colombia, Dominican Republic, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, South Korea, Taiwan, Thailand, Turkey, United Arab Emirates, and Vietnam on their growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table VI-11 presents the effects reported and table VI-12 provides the U.S. producers' narrative descriptions.

**Table VI-11****Aluminum extrusions: Count 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
Effect from any subject country	Investment	21
Effect from Dominican Republic specifically	Investment	15
Cancellation, postponement, or rejection of expansion projects	Investment	13
Denial or rejection of investment proposal	Investment	2
Reduction in the size of capital investments	Investment	3
Return on specific investments negatively impacted	Investment	16
Other investment effects	Investment	1
Any negative effects on investment	Investment	21
Effect from any subject country	Growth	19
Effect from Dominican Republic specifically	Growth	15
Rejection of bank loans	Growth	1
Lowering of credit rating	Growth	3
Problem related to the issue of stocks or bonds	Growth	1
Ability to service debt	Growth	9
Other growth and development effects	Growth	13
Any negative effects on growth and development	Growth	19
Anticipated negative effects of imports from any subject country	Future	25
Anticipated negative effects of imports from Dominican Republic specifically	Future	16

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

**Table VI-12****Aluminum extrusions: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2020**

Item	Firm name and accompanying narrative response on impact of imports
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***

Table continued.



**Table VI-12 Continued**

**Aluminum extrusions: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2020**

<b>Item</b>	<b>Firm name and accompanying narrative response on impact of imports</b>
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Denial or rejection of investment proposal	***
Denial or rejection of investment proposal	***

Table continued.

**Table VI-12 Continued**

**Aluminum extrusions: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2020**

<b>Item</b>	<b>Firm name and accompanying narrative response on impact of imports</b>
Reduction in the size of capital investments	***
Reduction in the size of capital investments	***
Reduction in the size of capital investments	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***

Table continued.

**Table VI-12 Continued**

**Aluminum extrusions: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2020**

Item	Firm name and accompanying narrative response on impact of imports
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Other (effects of imports on investment)	***

Table continued.

**Table VI-12 Continued**

**Aluminum extrusions: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2020**

Item	Firm name and accompanying narrative response on impact of imports
Rejection of bank loans	***
Lowering of credit rating	***
Lowering of credit rating	***
Lowering of credit rating	***
Problem relayed to the issue of stocks or bonds	***
Ability to service debt	***
Ability to service debt	***
Ability to service debt	***
Ability to service debt	***
Ability to service debt	***
Ability to service debt	***
Ability to service debt	***
Ability to service debt	***

Table continued.

**Table VI-12 Continued**

**Aluminum extrusions: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2020**

Item	Firm name and accompanying narrative response on impact of imports
Other (effects of imports on growth and development)	***
Other (effects of imports on growth and development)	***
Other (effects of imports on growth and development)	***
Other (effects of imports on growth and development)	***
Other (effects of imports on growth and development)	***
Other (effects of imports on growth and development)	***
Other (effects of imports on growth and development)	***
Other (effects of imports on growth and development)	***
Other (effects of imports on growth and development)	***
Other (effects of imports on growth and development)	***
Other (effects of imports on growth and development)	***

Table continued.

**Table VI-12 Continued**

**Aluminum extrusions: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2020**

<b>Item</b>	<b>Firm name and accompanying narrative response on impact of imports</b>
Other (effects of imports on growth and development)	***
Other (effects of imports on growth and development)	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***

Table continued.

**Table VI-12 Continued**

**Aluminum extrusions: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2020**

<b>Item</b>	<b>Firm name and accompanying narrative response on impact of imports</b>
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***

Table continued.

**Table VI-12 Continued**

**Aluminum extrusions: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2020**

Item	Firm name and accompanying narrative response on impact of imports
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***

Table continued.



**Table VI-12 Continued**

**Aluminum extrusions: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2020**

<b>Item</b>	<b>Firm name and accompanying narrative response on impact of imports</b>
Anticipated effects of imports	***
Anticipated effects of imports	***

Table continued.

**Table VI-12 Continued**

**Aluminum extrusions: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2020**

<b>Item</b>	<b>Firm name and accompanying narrative response on impact of imports</b>
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
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 alleged 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."

## Subject countries

The Commission issued foreign producer/exporter questionnaires to 348 firms for which valid contact information was obtained that are believed to produce and/or export aluminum extrusions from China, Colombia, the Dominican Republic, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, South Korea, Taiwan, Thailand, the UAE, and Vietnam.<sup>3</sup> Usable responses to the Commission's questionnaire were received from 50 firms in total:<sup>4 5</sup>

- two firms in China;
- two firms in Colombia;
- one firm in the Dominican Republic;
- two firms in Ecuador;
- one firm in India;
- five firms in Indonesia;
- six firms in Italy;
- six firms in Malaysia;
- nine firms in Mexico;
- one firm in Taiwan;
- five firms in Thailand;
- five firms in Turkey;
- one firm in the UAE; and
- four firms in Vietnam.

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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> The Commission did not receive any responses from firms in South Korea.

<sup>5</sup> One firm (\*\*\*) submitted an incomplete questionnaire response and one firm (\*\*\*) submitted a late questionnaire response; neither were included in the dataset. In addition, seven firms—\*\*\*—certified that they had not produced or exported aluminum extrusions at any time since January 1, 2020.

These firms' exports to the United States accounted for the following shares of U.S. imports of aluminum extrusions by source in 2022:<sup>6</sup>

- China, \*\*\* percent;
- Colombia, \*\*\* percent;
- Dominican Republic, \*\*\* percent;
- Ecuador, \*\*\* percent;
- India, \*\*\* percent;
- Indonesia, \*\*\* percent;
- Italy, \*\*\* percent;
- Malaysia, \*\*\* percent;
- Mexico, \*\*\* percent;
- South Korea, \*\*\* percent;
- Taiwan, \*\*\* percent;
- Thailand, \*\*\* percent;
- Turkey, \*\*\* percent;
- UAE, \*\*\* percent; and
- Vietnam, \*\*\* percent.

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<sup>6</sup> These shares reflect a comparison of export data reported by firms in response to the Commission's foreign producer/exporter questionnaire with official Commerce import statistics using HTS statistical reporting numbers 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080, accessed October, 13 2023. Official Commerce import statistics were adjusted using data submitted in response to the Commission's U.S. importer questionnaire to report China subject vs. nonsubject data and to add in reported in-scope imports under other HTS statistical reporting numbers.

According to estimates requested of the responding subject producers, the production of aluminum extrusions reported in questionnaire responses accounted for the following shares of overall production of aluminum extrusions by individual subject country in 2022:<sup>7</sup>

- China, \*\*\* percent;
- Colombia, \*\*\* percent;
- Dominican Republic, \*\*\* percent;
- Ecuador, \*\*\* percent;
- India, \*\*\* percent;
- Indonesia, \*\*\* percent;
- Italy, \*\*\* percent;
- Malaysia, \*\*\* percent;
- Mexico, \*\*\* percent;
- South Korea, \*\*\* percent;
- Taiwan, \*\*\* percent;
- Thailand, \*\*\* percent;
- Turkey, \*\*\* percent;
- UAE, \*\*\* percent; and
- Vietnam, \*\*\* percent.

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<sup>7</sup> Firms were asked in the Commission's foreign producer/exporter questionnaire to estimate the share of their country's production of aluminum extrusions that their firm accounted for. Since not all firms have perfect knowledge of the industry in their home market, different firms might use different denominators in estimating their firm's share of the total requested.

Table VII-1 presents information on the aluminum extrusions operations of the responding subject producers/exporters.

**Table VII-1**  
**Aluminum extrusions: Summary data for subject producers, 2022**

Firm and country	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
ABC Aluminum (Mexico)	***	***	***	***	***	***
Alca Metals (Indonesia)	***	***	***	***	***	***
Alumina Nacional (Colombia)	***	***	***	***	***	***
Arslan (Turkey)	***	***	***	***	***	***
Astas (Turkey)	***	***	***	***	***	***
Bracalente (China)	***	***	***	***	***	***
Calindo (Indonesia)	***	***	***	***	***	***
Cedal Duran (Ecuador)	***	***	***	***	***	***
Cuhadaroglu (Turkey)	***	***	***	***	***	***
Cuprum (Mexico)	***	***	***	***	***	***
Delta (Thailand)	***	***	***	***	***	***
East Asia Aluminum (Vietnam)	***	***	***	***	***	***
Elite Extrusions (UAE)	***	***	***	***	***	***
Envelex (Thailand)	***	***	***	***	***	***
Erdoganlar (Turkey)	***	***	***	***	***	***
Estral Spa (Italy)	***	***	***	***	***	***
Eural (Italy)	***	***	***	***	***	***
ExtMet (Mexico)	***	***	***	***	***	***
FISA (Ecuador)	***	***	***	***	***	***
Genesis (Malaysia)	***	***	***	***	***	***
Global Aluminium (India)	***	***	***	***	***	***
Grupo Occidente (Mexico)	***	***	***	***	***	***
HPM (Indonesia)	***	***	***	***	***	***
Hydro Atessa (Italy)	***	***	***	***	***	***
Hydro Monterrey (Mexico)	***	***	***	***	***	***
Hydro Reynosa (Mexico)	***	***	***	***	***	***
Hydro Shanghai (China)	***	***	***	***	***	***
Indal (Indonesia)	***	***	***	***	***	***
Indalum (Mexico)	***	***	***	***	***	***
Indinvest (Italy)	***	***	***	***	***	***
JS Aluminium (Malaysia)	***	***	***	***	***	***
Kamco (Malaysia)	***	***	***	***	***	***

Table continued.



Table VII-1 Continued

## Aluminum extrusions: Summary data for subject producers, 2022

Firm and country	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Kingtom (Dominican Republic)	***	***	***	***	***	***
LB Aluminium (Malaysia)	***	***	***	***	***	***
Mien Hua (Vietnam)	***	***	***	***	***	***
Neo (Mexico)	***	***	***	***	***	***
PMB (Malaysia)	***	***	***	***	***	***
Sapa (Italy)	***	***	***	***	***	***
Schimmer Metal (Thailand)	***	***	***	***	***	***
Sepal (Italy)	***	***	***	***	***	***
Tecnoglass (Colombia)	***	***	***	***	***	***
Thai Metal (Thailand)	***	***	***	***	***	***
Tuna Aluminium (Turkey)	***	***	***	***	***	***
Tung Kuang (Vietnam)	***	***	***	***	***	***
Tung Shin (Vietnam)	***	***	***	***	***	***
UAI (Thailand)	***	***	***	***	***	***
Valsa (Mexico)	***	***	***	***	***	***
Ye Fong (Taiwan)	***	***	***	***	***	***
YKK AP (Indonesia)	***	***	***	***	***	***
Zenshin (Malaysia)	***	***	***	***	***	***
All firms	1,091,646	100.0	220,004	100.0	1,088,051	20.2

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 "---".

## Changes in operations

Subject producers were asked to report any change in the character of their operations or organization relating to the production of aluminum extrusions since January 1, 2020. Thirty-one of 50 responding subject producers indicated in their questionnaires that they had experienced such changes. The most commonly reported changes were expansions (reported by 14 firms), production curtailments (reported by 13 firms), and prolonged shutdowns (reported by 11 firms). Table VII-2 presents the changes identified by these subject producers.

**Table VII-2**  
**Aluminum extrusions: Subject producers' reported changes in operations since January 1, 2020, by firm**

Item	Firm name, country of operation, and reported change in operations
Plant openings	***
Plant openings	***
Plant openings	***
Plant closings	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Prolonged shutdowns	***

Item	Firm name, country of operation, and reported change in operations
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Relocations	***
Relocations	***

Item	Firm name, country of operation, and reported change in operations
Relocations	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Acquisitions	***
Acquisitions	***
Acquisitions	***
Weather-related or force majeure events	***
Weather-related or force majeure events	***
Weather-related or force majeure events	***

Item	Firm name, country of operation, and reported change in operations
Weather-related or force majeure events	***
Weather-related or force majeure events	***
Other	***
Other	***
Other	***
Other	***
Other	***
Other	***
Other	***
Other	***
Other	***
Other	***

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

## Operations on aluminum extrusions

Table VII-3 presents data on subject producers' installed capacity, practical overall capacity, and practical aluminum extrusions capacity and production on the same equipment. Between 2020 and 2022, 31 firms reported no change in installed overall capacity, 14 firms reported an increase, and five firms reported a decrease. During 2020-22, 23 firms reported an increase in practical overall capacity, 23 firms reported no change, and four firms reported a decrease. Installed overall capacity increased by \*\*\* percent during 2020-22 but was \*\*\* percent lower in interim 2023 than in interim 2022. Installed overall capacity utilization increased irregularly by \*\*\* percentage points between 2020 and 2022, increasing by \*\*\* percentage points during 2020-21 then decreasing by \*\*\* percentage points during 2021-22; it was \*\*\* percentage points lower in interim 2023 than in interim 2022. Following a similar trend, practical overall capacity increased by \*\*\* percent during 2020-22 but was \*\*\* percent lower in interim 2023 compared to interim 2022. Practical overall capacity utilization increased irregularly by \*\*\* percentage points from 2020 to 2022, increasing by \*\*\* percentage points during 2020-21 then decreasing by \*\*\* percentage points during 2021-22; it was \*\*\* percentage points lower in interim 2023 compared to interim 2022.

**Table VII-3**  
**Aluminum extrusions: Subject producers' installed and practical capacity and production on the same equipment as in-scope production, by period**

Capacity and production in short tons; 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 aluminum extrusions	Capacity	1,247,644	1,320,127	1,347,043	688,694	679,738
Practical aluminum extrusions	Production	916,866	1,119,566	1,091,646	581,279	529,009
Practical aluminum extrusions	Utilization	73.5	84.8	81.0	84.4	77.8

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

Table VII-4 presents subject producers' reported capacity constraints since January 1, 2020. The most commonly reported capacity constraints were existing labor force (reported by 26 firms) and production bottlenecks (reported by 20 firms).

**Table VII-4**  
**Aluminum extrusions: Subject producers' reported capacity constraints since January 1, 2020**

Item	Firm name, country of operation and narrative response on constraints to practical overall capacity
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***

Item	Firm name, country of operation, and reported change in operations
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***



Item	Firm name, country of operation, and reported change in operations
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Supply of material inputs	***
Supply of material inputs	***
Supply of material inputs	***
Supply of material inputs	***
Supply of material inputs	***
Supply of material inputs	***
Supply of material inputs	***
Supply of material inputs	***
Supply of material inputs	***
Supply of material inputs	***
Supply of material inputs	***
Supply of material inputs	***
Fuel or energy	***
Fuel or energy	***

Item	Firm name, country of operation, and reported change in operations
Fuel or energy	***
Fuel or energy	***
Fuel or energy	***
Fuel or energy	***
Storage capacity	***
Storage capacity	***
Storage capacity	***
Storage capacity	***
Storage capacity	***
Storage capacity	***
Storage capacity	***
Storage capacity	***
Logistics/transportation	***
Logistics/transportation	***
Logistics/transportation	***
Logistics/transportation	***
Logistics/transportation	***
Logistics/transportation	***
Logistics/transportation	***
Logistics/transportation	***
Logistics/transportation	***
Logistics/transportation	***
Logistics/transportation	***
Logistics/transportation	***
Logistics/transportation	***
Other constraints	***
Other constraints	***

Item	Firm name, country of operation, and reported change in operations
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***

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

Table VII-5 presents information on the aluminum extrusions operations of the responding subject producers/exporters. Between 2020 and 2022, twenty-three firms reported no change in practical aluminum extrusions capacity, 22 firms reported an increase, and four firms reported a decrease. Subject producers' capacity increased overall by 8.0 percent during 2020-22 but was 1.3 percent lower in interim 2023 than in interim 2022. Subject producers' production increased by 22.1 percent during 2020-21 then decreased by 2.5 percent during 2021-22, increasing overall by 19.1 percent between 2020 and 2022. Production was 9.0 percent lower in interim 2023 than in interim 2022. Subject producers' capacity utilization increased by 11.3 percentage points during 2020-21 then decreased by 3.8 percentage points during 2021-22, increasing overall by 7.6 percentage points during 2020-22. Capacity utilization was 6.6 percentage points lower in interim 2023 compared to interim 2022. Relative to 2022 levels, subject producers' capacity is projected to be higher in 2023 and 2024, while production is projected to be lower in 2023 then higher in 2024.

Subject producers' internal consumption increased overall by 24.8 percent during 2020-22 but was 0.3 percent lower in interim 2023 than in interim 2022.<sup>8</sup> Commercial home market shipments increased irregularly by 4.8 percent between 2020 and 2022, increasing by 14.7 percent during 2020-21 then decreasing by 8.6 percent during 2021-22; they were 7.8 percent lower in interim 2023 compared to interim 2022. Subject producers' exports to the United States increased overall by 45.5 percent during 2020-22 but were 13.0 percent lower in interim 2023 than in interim 2022. The leading exporters of aluminum extrusions to the United States were \*\*\*. Exports to all other markets increased by 23.9 percent during 2020-21 then decreased by 1.3 percent during 2021-22, increasing overall by 22.3 percent between 2020 and 2022. In contrast, exports to all other markets were 19.3 percent lower in interim 2023 than in interim 2022. Relative to 2022 levels, internal consumption and commercial home market shipments are projected to be higher in 2023 and 2024, while exports to the United States and exports to all other markets are projected to be lower.

While commercial home market shipments accounted for the largest share of subject producers' total shipments, that share declined from 39.5 percent in 2020 to 37.0 percent in 2021 and to 34.5 percent in 2022. The share of total shipments accounted for by commercial home market shipments was higher in interim 2023 at 35.3 percent than in interim 2022 at 34.6 percent. Internal consumption as a share of total shipments decreased from 23.4 percent in 2020 to 22.9 percent in 2021 then increased to 24.4 percent in 2022; its share was higher in interim 2023 at 25.6 percent than in interim 2022 at 23.2 percent. While exports to the United States accounted for the smallest share of subject producers' total shipments, that share increased from 16.7 percent in 2020 to 19.4 percent in 2021 and to 20.2 percent in 2022. The share accounted for by exports to the United States was lower in interim 2023 (19.1 percent) than in interim 2022 (19.9 percent). Exports to all other markets as a share of total shipments increased from 20.4 percent in 2020 to 20.7 percent in 2021 and 20.8 percent in 2022; in contrast, its share was lower in interim 2023 at 19.9 percent than in interim 2022 at 22.3 percent.

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<sup>8</sup> \*\*\* accounted for approximately \*\*\* of subject producers' reported internal consumption over the period being examined.

**Table VII-5**  
**Aluminum extrusions: Data on subject industries, by period**

Quantity in short tons

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
Capacity	1,247,644	1,320,127	1,347,043	688,694	679,738	1,350,613	1,424,045
Production	916,866	1,119,566	1,091,646	581,279	529,009	1,029,364	1,096,610
End-of-period inventories	51,743	54,336	52,554	53,554	52,633	53,237	51,114
Internal consumption	212,881	254,329	265,717	134,355	133,907	266,944	281,531
Commercial home market shipments	358,283	410,876	375,500	200,364	184,735	364,846	396,576
Home market shipments	571,164	665,205	641,217	334,719	318,642	631,790	678,107
Exports to the United States	151,213	215,680	220,004	114,970	100,074	194,602	195,386
Exports to all other markets	185,477	229,895	226,830	128,853	104,043	195,837	220,371
Export shipments	336,690	445,575	446,834	243,823	204,117	390,439	415,757
Total shipments	907,854	1,110,780	1,088,051	578,542	522,759	1,022,229	1,093,864

Table continued.

**Table VII-5 Continued**  
**Aluminum extrusions: Data on subject industries, by period**

Share and ratio in percent

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
Capacity utilization ratio	73.5	84.8	81.0	84.4	77.8	76.2	77.0
Inventory ratio to production	5.6	4.9	4.8	4.6	5.0	5.2	4.7
Inventory ratio to total shipments	5.7	4.9	4.8	4.6	5.0	5.2	4.7
Internal consumption share	23.4	22.9	24.4	23.2	25.6	26.1	25.7
Commercial home market shipments share	39.5	37.0	34.5	34.6	35.3	35.7	36.3
Home market shipments share	62.9	59.9	58.9	57.9	61.0	61.8	62.0
Exports to the United States share	16.7	19.4	20.2	19.9	19.1	19.0	17.9
Exports to all other markets share	20.4	20.7	20.8	22.3	19.9	19.2	20.1
Export shipments share	37.1	40.1	41.1	42.1	39.0	38.2	38.0
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.

Table VII-6 presents information on the aluminum extrusions operations of the responding producers/exporters by subject country. The leading subject countries by reported practical capacity to produce aluminum extrusions include Indonesia, Italy, Malaysia, Mexico, Turkey, and Vietnam.

During 2020-22, Chinese producers' capacity increased overall by \*\*\* percent during 2020-22 and was \*\*\* percent higher in interim 2023 than in interim 2022. Similarly, production increased overall by \*\*\* percent from 2020 to 2022 and was \*\*\* percent higher in interim 2023 than in interim 2022. Capacity utilization increased by \*\*\* percentage points during 2020-22 and was \*\*\* percentage points higher in interim 2023 than in interim 2022. Chinese producers' capacity and production are projected to be higher in 2023 and 2024 than 2022 levels.

From 2020 to 2022, Colombian producers' capacity and production increased overall by \*\*\* percent and \*\*\* percent, respectively. Colombian producers' capacity was \*\*\* percent higher in interim 2023 than in interim 2022, while production was \*\*\* percent lower over the same comparison. Capacity utilization increased by \*\*\* percentage points during 2020-22 but was \*\*\* percentage points lower in interim 2023 compared to interim 2022. Colombian producers' capacity and production are projected to be higher than 2022 levels in 2023 and 2024.

The Dominican producer's capacity remained constant throughout the period being examined. Production increased by \*\*\* percent during 2020-21 then decreased by \*\*\* percent during 2021-22, decreasing overall by \*\*\* percent from 2020 to 2022. The Dominican producer's production was \*\*\* percent higher in interim 2023 than in interim 2022. Capacity utilization decreased overall by \*\*\* percentage points during 2020-22 but was \*\*\* percentage points higher in interim 2023 than in interim 2022. The Dominican producer's capacity is projected to remain constant in 2023 and 2024, while production is projected to be higher than 2022 levels in 2023 and 2024.<sup>9</sup>

From 2020 to 2022, Ecuadorian producers' capacity and production increased overall by \*\*\* percent and \*\*\* percent, respectively. Conversely, capacity was \*\*\* percent lower in

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<sup>9</sup> On October 5, 2020, Aluminum Extrusions Fair Trade Committee filed an Enforce and Protect Act (EAPA) allegation with U.S. Customs and Border Protection (CBP) against Kingtom, a producer of aluminum extrusions in the Dominican Republic, alleging that U.S. imports of Chinese-origin aluminum extrusions were being transshipped through the Dominican Republic (via Kingtom) to evade payment of AD/CVD duties. On February 4, 2022, CBP issued a determination, finding substantial evidence to support the complaint. On March 21, 2022, Kingtom filed a timely request for review. On June 29, 2022, following the review, CBP reversed the February 4, 2022 determination. Petition, exh. I-19.

interim 2023 than in interim 2022; production was \*\*\* percent lower over the same comparison. Capacity utilization increased by \*\*\* percentage points during 2020-22 but was \*\*\* percentage points lower in interim 2023 compared to interim 2022. Capacity is projected to be lower than 2022 levels in 2023 then bouncing back to 2022 levels in 2024, while production is projected to be lower than 2022 levels in 2023 and 2024.

The Indian producer's capacity increased by \*\*\* percent during 2020-21 then remained constant throughout the rest of the period being examined. The Indian producer's production increased overall by \*\*\* percent during 2020-22 and was \*\*\* percent higher in interim 2023 than in interim 2022. Capacity utilization increased overall by \*\*\* percentage points during 2020-22 and was \*\*\* percentage points higher in interim 2023 than in interim 2022. The Indian producer's capacity is projected to be equal to 2022 levels in 2023 and 2024, while production is projected to be higher than 2022 levels in 2023 and 2024.

Indonesian producers' capacity increased overall by \*\*\* percent between 2020 and 2022, increasing by \*\*\* percent during 2020-21 then decreasing by \*\*\* percent during 2021-22. Conversely, Indonesian producers' production decreased overall by \*\*\* percent during 2020-22, increasing by \*\*\* percent during 2020-21 then decreasing by \*\*\* percent during 2021-22. Capacity was \*\*\* percent lower in interim 2023 than in interim 2022 and production was \*\*\* percent lower over the same comparison. Indonesian producers' capacity utilization decreased irregularly by \*\*\* percentage points during 2020-22, increasing by \*\*\* percentage points during 2020-21 then decreasing by \*\*\* percentage points during 2021-22; it was \*\*\* percentage points lower in interim 2023 than in interim 2022. Indonesian producers' capacity and production are projected to be lower in 2023 and 2024 compared to 2022 levels.

Italian producers' capacity remained constant throughout the period being examined. Italian producers' production increased overall by \*\*\* percent between 2020 and 2022, increasing by \*\*\* percent during 2020-21 then decreasing by \*\*\* percent during 2021-22. Production was \*\*\* percent lower in interim 2023 than in interim 2022. Italian producers' capacity utilization increased overall by \*\*\* percentage points during 2020-22 but was \*\*\* percentage points lower in interim 2023 compared to interim 2022. Italian producers' capacity is projected to remain constant at 2022 levels in 2023 and 2024, while production is projected to be lower in 2023 and 2024 compared to 2022 levels.

Malaysian producers' capacity increased overall by \*\*\* percent between 2020 and 2022 but was \*\*\* percent lower in interim 2023 compared to interim 2022. Malaysian producers' production increased overall by \*\*\* percent during 2020-22, increasing by \*\*\* percent during 2020-21 then decreasing by \*\*\* percent during 2021-22. Production was \*\*\* percent lower in interim 2023 than in interim 2022. Malaysian producers' capacity utilization

increased overall by \*\*\* percentage points during 2020-22 but was \*\*\* percentage points lower in interim 2023 than in interim 2022. Malaysian producers' capacity and production are projected to fluctuate lower than 2022 levels in 2023 then higher than 2022 levels in 2024.

Mexican producers' capacity and production increased overall by \*\*\* percent and \*\*\* percent, respectively during 2020-22. Capacity was \*\*\* percent higher in interim 2023 than in interim 2022, while production was \*\*\* percent lower over the same comparison. Mexican producers' capacity utilization increased overall by \*\*\* percentage points during 2020-22 but was \*\*\* percentage points lower in interim 2023 than in interim 2022. Mexican producers' capacity and production are projected to be higher than 2022 levels in 2023 and 2024.

The Taiwanese producer's capacity and production increased overall by \*\*\* percent and \*\*\* percent, respectively, during 2020-22. Capacity was \*\*\* percent higher in interim 2023 than in interim 2022 and production was \*\*\* percent over the same comparison. Capacity utilization remained constant during 2020-22 and both interim periods. The Taiwanese producer's capacity and production are projected to be higher than 2022 levels in 2023 and 2024.

Thai producers' capacity increased overall by \*\*\* percent during 2020-22 but was \*\*\* percent lower in interim 2023 compared to interim 2022. Thai producers' production increased by \*\*\* percent during 2020-21 then decreased by \*\*\* percent during 2021-22, increasing overall by \*\*\* percent between 2020 and 2022. Production was \*\*\* percent lower in interim 2023 than in interim 2022. Thai producers' capacity utilization increased by \*\*\* percentage points during 2020-21 then decreased by \*\*\* percentage points during 2021-22, decreasing overall by \*\*\* percentage points during 2020-22. Thai producers' capacity and production are projected to be higher than 2022 levels in 2023 and 2024.

Turkish producers' capacity and production increased overall by \*\*\* percent and \*\*\* percent, respectively, during 2020-22. Turkish producers' capacity was \*\*\* percent lower in interim 2023 than in interim 2022 and production was \*\*\* percent lower over the same comparison. Capacity utilization increased by \*\*\* percentage points during 2020-21 then decreased by \*\*\* percentage points during 2021-22, increasing by \*\*\* percentage points overall from 2020 to 2022. Capacity utilization was \*\*\* percentage points lower in interim 2023 compared to interim 2022. Turkish producers' capacity and production are projected to fluctuate lower than 2022 levels in 2023 then higher than 2022 levels in 2024.

The Emirati producer's capacity remained constant throughout the period being examined. Production increased by \*\*\* percent during 2020-21 then decreased by \*\*\* percent during 2021-22, decreasing overall by \*\*\* percent between 2020 and 2022. The



Emirati producer’s production was \*\*\* percent higher in interim 2023 than in interim 2022. Capacity utilization increased by \*\*\* percentage points during 2020-21 then decreased by \*\*\* percentage points during 2021-22, decreasing overall by \*\*\* percentage points during 2020-22. Capacity utilization was \*\*\* percentage points higher in interim 2023 compared to interim 2022. The Emirati producer’s capacity is projected to remain constant in 2023 and 2024, while production is projected to be higher than 2022 levels in 2023 and 2024.

Vietnamese producers’ capacity increased overall by \*\*\* percent during 2020-22 but was \*\*\* percent lower in interim 2023 compared to interim 2022. Vietnamese producers’ production increased by \*\*\* percent during 2020-21 then decreased by \*\*\* percent during 2021-22, increasing overall by \*\*\* percent during 2020-22. Production was \*\*\* percent lower in interim 2023 than in interim 2022. Vietnamese producers’ capacity utilization increased by \*\*\* percentage points during 2020-21 then decreased by \*\*\* percentage points during 2021-22, decreasing overall by \*\*\* percentage points from 2020 to 2022. Capacity utilization was \*\*\* percentage points lower in interim 2023 than in interim 2022. Vietnamese producers’ capacity and production are projected to be lower than 2022 levels in 2023 and 2024.

**Table VII-6**  
**Aluminum extrusions: Subject producers’ output: Practical capacity, by source and period**

Capacity in short tons

Source	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
China	***	***	***	***	***	***	***
Colombia	***	***	***	***	***	***	***
Dominican Republic	***	***	***	***	***	***	***
Ecuador	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
Indonesia	***	***	***	***	***	***	***
Italy	***	***	***	***	***	***	***
Malaysia	***	***	***	***	***	***	***
Mexico	***	***	***	***	***	***	***
South Korea	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***
United Arab Emirates	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All reporting subject producers	1,247,644	1,320,127	1,347,043	688,694	679,738	1,350,613	1,424,045

Table continued.

**Table VII-6 Continued**

**Aluminum extrusions: Subject producers' output: Production, by source and period**

Production in short tons

Source	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
China	***	***	***	***	***	***	***
Colombia	***	***	***	***	***	***	***
Dominican Republic	***	***	***	***	***	***	***
Ecuador	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
Indonesia	***	***	***	***	***	***	***
Italy	***	***	***	***	***	***	***
Malaysia	***	***	***	***	***	***	***
Mexico	***	***	***	***	***	***	***
South Korea	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***
United Arab Emirates	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All reporting subject producers	916,866	1,119,566	1,091,646	581,279	529,009	1,029,364	1,096,610

Table continued.

**Table VII-6 Continued**

**Aluminum extrusions: Subject producers' output: Practical capacity utilization, by source and period**

Capacity utilization ratio in percent

Source	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
China	***	***	***	***	***	***	***
Colombia	***	***	***	***	***	***	***
Dominican Republic	***	***	***	***	***	***	***
Ecuador	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
Indonesia	***	***	***	***	***	***	***
Italy	***	***	***	***	***	***	***
Malaysia	***	***	***	***	***	***	***
Mexico	***	***	***	***	***	***	***
South Korea	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***
United Arab Emirates	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All reporting subject producers	73.5	84.8	81.0	84.4	77.8	76.2	77.0

Table continued.

**Table VII-6 Continued****Aluminum extrusions: Subject producers' output: Share of production, by source and period**

Share of production in percent

Source	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
China	***	***	***	***	***	***	***
Colombia	***	***	***	***	***	***	***
Dominican Republic	***	***	***	***	***	***	***
Ecuador	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
Indonesia	***	***	***	***	***	***	***
Italy	***	***	***	***	***	***	***
Malaysia	***	***	***	***	***	***	***
Mexico	***	***	***	***	***	***	***
South Korea	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***
United Arab Emirates	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All reporting subject producers	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: 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 VII-7 presents export data of the responding producers/exporters. Exports to the United States from 12 subject countries increased overall between 2020 and 2022. During this period, exports to the United States increased by the following magnitudes (by source): China, \*\*\* percent; Colombia, \*\*\* percent; Ecuador, \*\*\* percent; India, \*\*\* percent; Indonesia, \*\*\* percent; Italy, \*\*\* percent; Malaysia, \*\*\* percent; Mexico, \*\*\* percent; Taiwan, \*\*\* percent; Thailand, \*\*\* percent; Turkey, \*\*\* percent; and Vietnam, \*\*\* percent. Exports to the United States from the Dominican Republic decreased overall by \*\*\* percent during 2020-22. \*\*\* to the United States from the UAE.<sup>10</sup> Exports to the United States from 12 subject countries (China, Colombia, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, Taiwan, Thailand, Turkey, and Vietnam) were lower in interim 2023 than in interim 2022, while exports to the United States from the Dominican Republic were higher over the same comparison.

<sup>10</sup> As previously discussed, the Commission did not receive any questionnaire responses from firms in South Korea.

Several subject countries are primarily export oriented; total exports accounted for the following shares of total shipments in 2022 by source: the Dominican Republic, \*\*\* percent; Ecuador \*\*\* percent; Indonesia, \*\*\* percent; Taiwan, \*\*\* percent; Turkey, \*\*\* percent; and Vietnam, \*\*\* percent. Moreover, exports to the United States accounted for the following shares of total shipments in 2022 by source: the Dominican Republic, \*\*\* percent; Ecuador, \*\*\* percent, and Vietnam, \*\*\* percent.

**Table VII-7**  
**Aluminum extrusions: Subject producers' exports: Quantity of exports to the United States, by source and period**

Quantity in short tons

Source	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
China	***	***	***	***	***	***	***
Colombia	***	***	***	***	***	***	***
Dominican Republic	***	***	***	***	***	***	***
Ecuador	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
Indonesia	***	***	***	***	***	***	***
Italy	***	***	***	***	***	***	***
Malaysia	***	***	***	***	***	***	***
Mexico	***	***	***	***	***	***	***
South Korea	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***
United Arab Emirates	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All reporting subject producers	151,213	215,680	220,004	114,970	100,074	194,602	195,386

Table continued.

**Table VII-7 Continued**

**Aluminum extrusions: Subject producers' exports: Share of exports to the United States out of total shipments, by source and period**

Share of total shipments in percent

Source	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
China	***	***	***	***	***	***	***
Colombia	***	***	***	***	***	***	***
Dominican Republic	***	***	***	***	***	***	***
Ecuador	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
Indonesia	***	***	***	***	***	***	***
Italy	***	***	***	***	***	***	***
Malaysia	***	***	***	***	***	***	***
Mexico	***	***	***	***	***	***	***
South Korea	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***
United Arab Emirates	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All reporting subject producers	16.7	19.4	20.2	19.9	19.1	19.0	17.9

Table continued.

**Table VII-7 Continued**

**Aluminum extrusions: Subject producers' exports: Quantity of total exports, by source and period**

Quantity in short tons

Source	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
China	***	***	***	***	***	***	***
Colombia	***	***	***	***	***	***	***
Dominican Republic	***	***	***	***	***	***	***
Ecuador	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
Indonesia	***	***	***	***	***	***	***
Italy	***	***	***	***	***	***	***
Malaysia	***	***	***	***	***	***	***
Mexico	***	***	***	***	***	***	***
South Korea	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***
United Arab Emirates	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All reporting subject producers	336,690	445,575	446,834	243,823	204,117	390,439	415,757

Table continued.

**Table VII-7 Continued**

**Aluminum extrusions: Subject producers' exports: Share of total exports out of total shipments, by source and period**

Share of total shipments in percent

Source	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
China	***	***	***	***	***	***	***
Colombia	***	***	***	***	***	***	***
Dominican Republic	***	***	***	***	***	***	***
Ecuador	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
Indonesia	***	***	***	***	***	***	***
Italy	***	***	***	***	***	***	***
Malaysia	***	***	***	***	***	***	***
Mexico	***	***	***	***	***	***	***
South Korea	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***
United Arab Emirates	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All reporting subject producers	37.1	40.1	41.1	42.1	39.0	38.2	38.0

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

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



## Alternative products

Table VII-8 presents subject producers' overall production on the same equipment and machinery used to produce aluminum extrusions. Aluminum extrusions accounted for the vast majority (\*\* to \*\* percent) of subject producers' overall production. Three of 50 firms reported the production of other products—\*\* produced extrusions using aluminum alloy series 2 and 7; \*\* produced aluminum billets; and \*\* produced extrusions using aluminum alloy series 2, 5, and 7.

**Table VII-8**  
**Aluminum extrusions: Subject producers' overall production on the same equipment as in-scope production, by period**

Quantity in short tons; share in percent

Product type	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Aluminum extrusions	Quantity	916,866	1,119,566	1,091,646	581,279	529,009
Other products	Quantity	**	**	**	**	**
All products	Quantity	**	**	**	**	**
Aluminum extrusions	Share	**	**	**	**	**
Other 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.

## Exports

Table VII-9 presents Global Trade Atlas (“GTA”) data for exports of aluminum extrusions from subject countries to the United States and to all destination markets. In terms of value, exports from each subject country to the United States were higher in 2022 than in 2020. Collectively, exports from combined subject countries to the United States increased by 104.3 percent over this period. The largest increases during 2020-22 were from India and Vietnam, whose exports of aluminum extrusions to the United States increased by 231.6 percent and 201.4 percent, respectively. Over the same period, exports of aluminum extrusions to the United States from Colombia, Ecuador, Malaysia, Mexico, Turkey and the UAE more than doubled.

China, Italy, and Turkey are the leading exporters of aluminum extrusions to all destination markets; combined they accounted for roughly three-fourths of total exports by value in 2022. China alone accounted for approximately half of total exports by value in 2022.

**Table VII-9**  
**Aluminum extrusions: Exports from subject countries, by exporting country, destination market, and period**

Value in 1,000 dollars

Exporting country	Measure	Destination market	2020	2021	2022
China	Value	United States	557,140	744,499	878,997
Colombia	Value	United States	222,622	311,130	525,039
Dominican Republic	Value	United States	41,382	85,075	69,987
Ecuador	Value	United States	35,449	54,407	82,485
India	Value	United States	53,915	112,241	178,785
Indonesia	Value	United States	82,723	135,960	139,278
Italy	Value	United States	103,732	106,832	119,872
Malaysia	Value	United States	46,909	98,617	111,782
Mexico	Value	United States	267,130	454,709	676,652
South Korea	Value	United States	70,186	78,457	115,720
Taiwan	Value	United States	53,797	70,722	107,530
Thailand	Value	United States	45,045	51,363	65,375
Turkey	Value	United States	76,440	147,195	192,855
United Arab Emirates	Value	United States	14,515	11,856	32,503
Vietnam	Value	United States	120,756	202,382	363,940
Subject exporters	Value	United States	1,791,742	2,665,443	3,660,798

Table continued.

**Table VII-9 Continued****Aluminum extrusions: Exports from subject countries, by exporting country, destination market, and period**

Value in 1,000 dollars

<b>Exporting country</b>	<b>Measure</b>	<b>Destination market</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
China	Value	All destination markets	7,162,192	9,440,088	10,409,233
Colombia	Value	All destination markets	242,579	338,168	555,902
Dominican Republic	Value	All destination markets	47,622	91,185	76,495
Ecuador	Value	All destination markets	45,274	68,630	98,866
India	Value	All destination markets	119,051	256,845	391,534
Indonesia	Value	All destination markets	175,373	267,264	274,882
Italy	Value	All destination markets	1,742,470	1,980,353	2,289,012
Malaysia	Value	All destination markets	244,926	427,039	495,764
Mexico	Value	All destination markets	268,757	464,313	684,320
South Korea	Value	All destination markets	392,477	418,693	537,084
Taiwan	Value	All destination markets	164,824	217,594	272,311
Thailand	Value	All destination markets	433,314	462,464	489,901
Turkey	Value	All destination markets	1,408,621	2,288,496	2,999,967
United Arab Emirates	Value	All destination markets	336,882	443,917	501,672
Vietnam	Value	All destination markets	415,826	567,753	782,012
Subject exporters	Value	All destination markets	13,200,189	17,732,802	20,858,954

Source: Official exports statistics and official global imports statistics from Vietnam (constructed exports) under HS subheadings 7604.10, 7604.21, 7604.29, 7608.10, 7608.20, 7609.00, 7610.10, 7610.90 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed October 18, 2023.

Table VII-10 presents GTA data for exports of aluminum extrusions from subject countries to the United States. The United States was the primary destination for exports of aluminum extrusions from several subject countries. During 2022, the vast majority of exports of aluminum extrusions from Mexico (98.9 percent), Colombia (94.4 percent), the Dominican Republic (91.5 percent), and Ecuador (83.4 percent) were destined for the United States. Roughly half of exports of aluminum extrusions from Indonesia (50.7 percent), Vietnam (46.5 percent), and India (45.7 percent) were destined for the United States during 2022.

**Table VII-10**  
**Aluminum extrusions: Exports from subject countries, by exporting country, destination market, and period**

Share in percent

Exporting country	Measure	Destination market	2020	2021	2022
China	Share	United States	7.8	7.9	8.4
Colombia	Share	United States	91.8	92.0	94.4
Dominican Republic	Share	United States	86.9	93.3	91.5
Ecuador	Share	United States	78.3	79.3	83.4
India	Share	United States	45.3	43.7	45.7
Indonesia	Share	United States	47.2	50.9	50.7
Italy	Share	United States	6.0	5.4	5.2
Malaysia	Share	United States	19.2	23.1	22.5
Mexico	Share	United States	99.4	97.9	98.9
South Korea	Share	United States	17.9	18.7	21.5
Taiwan	Share	United States	32.6	32.5	39.5
Thailand	Share	United States	10.4	11.1	13.3
Turkey	Share	United States	5.4	6.4	6.4
United Arab Emirates	Share	United States	4.3	2.7	6.5
Vietnam	Share	United States	29.0	35.6	46.5
Subject exporters	Share	United States	13.6	15.0	17.6

Source: Official exports statistics and official global imports statistics from Vietnam (constructed exports) under HS subheadings 7604.10, 7604.21, 7604.29, 7608.10, 7608.20, 7609.00, 7610.10, 7610.90 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed October 18, 2023.

## U.S. inventories of imported merchandise

Table VII-11 presents data on U.S. importers' reported inventories of aluminum extrusions. U.S. importers' inventories of imports from subject sources increased by 53.2 percent between 2020 and 2022 but were 2.1 percent lower in interim 2023 compared to interim 2022.<sup>11</sup> U.S. importers' inventories of imports from nonsubject sources increased by \*\*\* percent during 2020-22 and were \*\*\* percent higher in interim 2023 than in interim 2022.

**Table VII-11**  
**Aluminum extrusions: U.S. importers' inventories and their ratio to select items, by source and period**

Quantity in short tons; ratio in percent

Measure	Source	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Inventories quantity	China, subject	***	***	***	***	***
Ratio to imports	China, subject	***	***	***	***	***
Ratio to U.S. shipments of imports	China, subject	***	***	***	***	***
Ratio to total shipments of imports	China, subject	***	***	***	***	***
Inventories quantity	Colombia	***	***	***	***	***
Ratio to imports	Colombia	***	***	***	***	***
Ratio to U.S. shipments of imports	Colombia	***	***	***	***	***
Ratio to total shipments of imports	Colombia	***	***	***	***	***
Inventories quantity	Dominican Republic	***	***	***	***	***
Ratio to imports	Dominican Republic	***	***	***	***	***
Ratio to U.S. shipments of imports	Dominican Republic	***	***	***	***	***
Ratio to total shipments of imports	Dominican Republic	***	***	***	***	***
Inventories quantity	Ecuador	***	***	***	***	***
Ratio to imports	Ecuador	***	***	***	***	***
Ratio to U.S. shipments of imports	Ecuador	***	***	***	***	***
Ratio to total shipments of imports	Ecuador	***	***	***	***	***
Inventories quantity	India	***	***	***	***	***
Ratio to imports	India	***	***	***	***	***
Ratio to U.S. shipments of imports	India	***	***	***	***	***
Ratio to total shipments of imports	India	***	***	***	***	***

Table continued.

<sup>11</sup> Inventories of imports from \*\*\* accounted for roughly \*\*\* percent of U.S. importers' inventories from subject sources. Inventories of imports from \*\*\* increased by \*\*\* percent during 2020-22 but were \*\*\* percent lower in interim 2023 compared to interim 2022.

**Table VII-11 Continued**  
**Aluminum extrusions: U.S. importers' inventories and their ratio to select items, by source and period**

Quantity in short tons; ratio in percent

Measure	Source	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Inventories quantity	Indonesia	***	***	***	***	***
Ratio to imports	Indonesia	***	***	***	***	***
Ratio to U.S. shipments of imports	Indonesia	***	***	***	***	***
Ratio to total shipments of imports	Indonesia	***	***	***	***	***
Inventories quantity	Italy	***	***	***	***	***
Ratio to imports	Italy	***	***	***	***	***
Ratio to U.S. shipments of imports	Italy	***	***	***	***	***
Ratio to total shipments of imports	Italy	***	***	***	***	***
Inventories quantity	Malaysia	***	***	***	***	***
Ratio to imports	Malaysia	***	***	***	***	***
Ratio to U.S. shipments of imports	Malaysia	***	***	***	***	***
Ratio to total shipments of imports	Malaysia	***	***	***	***	***
Inventories quantity	Mexico	***	***	***	***	***
Ratio to imports	Mexico	***	***	***	***	***
Ratio to U.S. shipments of imports	Mexico	***	***	***	***	***
Ratio to total shipments of imports	Mexico	***	***	***	***	***
Inventories quantity	South Korea	***	***	***	***	***
Ratio to imports	South Korea	***	***	***	***	***
Ratio to U.S. shipments of imports	South Korea	***	***	***	***	***
Ratio to total shipments of imports	South Korea	***	***	***	***	***
Inventories quantity	Taiwan	***	***	***	***	***
Ratio to imports	Taiwan	***	***	***	***	***
Ratio to U.S. shipments of imports	Taiwan	***	***	***	***	***
Ratio to total shipments of imports	Taiwan	***	***	***	***	***
Inventories quantity	Thailand	***	***	***	***	***
Ratio to imports	Thailand	***	***	***	***	***
Ratio to U.S. shipments of imports	Thailand	***	***	***	***	***
Ratio to total shipments of imports	Thailand	***	***	***	***	***
Inventories quantity	Turkey	***	***	***	***	***
Ratio to imports	Turkey	***	***	***	***	***
Ratio to U.S. shipments of imports	Turkey	***	***	***	***	***
Ratio to total shipments of imports	Turkey	***	***	***	***	***
Inventories quantity	United Arab Emirates	***	***	***	***	***
Ratio to imports	United Arab Emirates	***	***	***	***	***
Ratio to U.S. shipments of imports	United Arab Emirates	***	***	***	***	***
Ratio to total shipments of imports	United Arab Emirates	***	***	***	***	***
Inventories quantity	Vietnam	***	***	***	***	***
Ratio to imports	Vietnam	***	***	***	***	***
Ratio to U.S. shipments of imports	Vietnam	***	***	***	***	***
Ratio to total shipments of imports	Vietnam	***	***	***	***	***

Table continued.

**Table VII-11 Continued**  
**Aluminum extrusions: U.S. importers' inventories and their ratio to select items, by source and period**

Quantity in short tons; ratio in percent

Measure	Source	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Inventories quantity	Subject sources	28,962	34,643	44,369	32,879	32,180
Ratio to imports	Subject sources	***	***	***	***	***
Ratio to U.S. shipments of imports	Subject sources	***	***	***	***	***
Ratio to total shipments of imports	Subject sources	***	***	***	***	***
Inventories quantity	China, nonsubject	***	***	***	***	***
Ratio to imports	China, nonsubject	***	***	***	***	***
Ratio to U.S. shipments of imports	China, nonsubject	***	***	***	***	***
Ratio to total shipments of imports	China, nonsubject	***	***	***	***	***
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 sources	***	***	***	***	***
Ratio to imports	Nonsubject sources	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject sources	***	***	***	***	***
Ratio to total shipments of imports	Nonsubject sources	***	***	***	***	***
Inventories quantity	All import sources	***	***	***	***	***
Ratio to imports	All import sources	***	***	***	***	***
Ratio to U.S. shipments of imports	All import sources	***	***	***	***	***
Ratio to total shipments of imports	All import sources	***	***	***	***	***

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

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

## U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of aluminum extrusions after June 30, 2023. Their reported data is presented in table VII-12. Subject sources accounted for \*\*\* percent of U.S. importers' arranged imports of aluminum extrusions. The leading individual sources of U.S. importers' total arranged imports were Malaysia, Mexico, and Vietnam, collectively accounting for approximately \*\*\* of those imports.

**Table VII-12**  
**Aluminum extrusions: U.S. importers' arranged imports, by source and period**

Quantity in short tons

Source	Measure	Jul-Sep 2023	Oct-Dec 2023	Jan-Mar 2024	Apr-Jun 2024	Total
China, subject	Quantity	***	***	***	***	***
Colombia	Quantity	***	***	***	***	***
Dominican Republic	Quantity	***	***	***	***	***
Ecuador	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Indonesia	Quantity	***	***	***	***	***
Italy	Quantity	***	***	***	***	***
Malaysia	Quantity	***	***	***	***	***
Mexico	Quantity	***	***	***	***	***
South Korea	Quantity	***	***	***	***	***
Taiwan	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Turkey	Quantity	***	***	***	***	***
United Arab Emirates	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
China, nonsubject	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***

Table continued.



**Table VII-12 Continued**  
**Aluminum extrusions: U.S. importers' arranged imports, by source and period**

Share in percent

Source	Measure	Jul-Sep 2023	Oct-Dec 2023	Jan-Mar 2024	Apr-Jun 2024	Total
China, subject	Share	***	***	***	***	***
Colombia	Share	***	***	***	***	***
Dominican Republic	Share	***	***	***	***	***
Ecuador	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Indonesia	Share	***	***	***	***	***
Italy	Share	***	***	***	***	***
Malaysia	Share	***	***	***	***	***
Mexico	Share	***	***	***	***	***
South Korea	Share	***	***	***	***	***
Taiwan	Share	***	***	***	***	***
Thailand	Share	***	***	***	***	***
Turkey	Share	***	***	***	***	***
United Arab Emirates	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
China, nonsubject	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.

## Third-country trade actions

In January 2020, Canada continued antidumping and countervailing duty orders on certain aluminum extrusions from China that were initially imposed in 2009.<sup>12</sup> In March 2021, the European Union set antidumping duties between 21.2 percent and 32.1 percent on aluminum extrusions from China.<sup>13</sup> In December 2022, the United Kingdom set antidumping duties up to 35.1 percent on aluminum extrusions from China.<sup>14</sup> In October 2022, Australia continued antidumping and countervailing duty orders on aluminum extrusions from China that were initially imposed in 2010.<sup>15</sup> Australia also imposed anti-dumping duties on aluminum extrusions as extruded (mill finish) or with surface finishes from Malaysia in June 2021.<sup>16</sup> A separate Australian order that had placed anti-dumping duties on aluminum extrusions from Malaysia and Vietnam expired in June 2022.<sup>17</sup>

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<sup>12</sup> World Trade Organization (“WTO”), Committee on Anti-Dumping Practices, Semi-Annual Report Under Article I6.4 of the WTO Antidumping Agreement: Canada, Reporting period July 1 to December 31, 2022, retrieved October 26, 2023; World Trade Organization (“WTO”), Committee on Subsidies and Countervailing Measures, Semi-Annual Report Under Article 25.11 of the WTO Antidumping Agreement: Canada, Reporting period July 1 to December 31, 2022, retrieved October 26, 2023.

<sup>13</sup> OJ L 109 30.3.2021, p. 1, [http://data.europa.eu/eli/reg\\_impl/2021/546/2022-06-25](http://data.europa.eu/eli/reg_impl/2021/546/2022-06-25).

<sup>14</sup> World Trade Organization (“WTO”), Committee on Anti-Dumping Practices, Semi-Annual Report Under Article I6.4 of the WTO Antidumping Agreement: United Kingdom, Reporting period July 1 to December 31, 2022, retrieved November 1, 2023.

<sup>15</sup> World Trade Organization (“WTO”), Committee on Anti-Dumping Practices, Semi-Annual Report Under Article I6.4 of the WTO Antidumping Agreement: Australia, Reporting period July 1 to December 31, 2022, retrieved October 26, 2023; World Trade Organization (“WTO”), Committee on Subsidies and Countervailing Measures, Semi-Annual Report Under Article 25.11 of the WTO Antidumping Agreement: Australia, Reporting period July 1 to December 31, 2022, retrieved October 26, 2023.

<sup>16</sup> *Id.*

<sup>17</sup> Australian Anti-dumping Commission, Notice No. 2022/042, June 24, 2022, retrieved October 26, 2023.

## Information on nonsubject countries

Table VII-13 presents global export data for aluminum extrusions and some out-of-scope products. The largest global exporter was China, representing 21.2 percent of global export values in 2022, with exports of just over \$10.4 billion. The next four leading exporters, which accounted for a combined 27.1 percent of global export value in 2022, were Germany, Turkey, Poland, and Spain. Nonsubject exporters, combined, represented about 53.3 percent of total global exports in 2022.

**Table VII-13**  
**Aluminum extrusions: Global exports by exporter and period**

Value in 1,000 dollars

Exporting country	Measure	2020	2021	2022
United States	Value	1,507,841	1,731,783	2,079,330
China	Value	7,162,192	9,440,088	10,409,233
Colombia	Value	242,579	338,168	555,902
Dominican Republic	Value	47,622	91,185	76,495
Ecuador	Value	45,274	68,630	98,866
India	Value	119,051	256,845	391,534
Indonesia	Value	175,373	267,264	274,882
Italy	Value	1,742,470	1,980,353	2,289,012
Malaysia	Value	244,926	427,039	495,764
Mexico	Value	268,757	464,313	684,320
South Korea	Value	392,477	418,693	537,084
Taiwan	Value	164,824	217,594	272,311
Thailand	Value	433,314	462,464	489,901
Turkey	Value	1,408,621	2,288,496	2,999,967
United Arab Emirates	Value	336,882	443,917	501,672
Vietnam	Value	415,826	567,753	782,012
Subject exporters	Value	13,200,189	17,732,802	20,858,954
Germany	Value	3,639,700	4,536,832	5,277,519
Poland	Value	1,405,371	1,870,768	2,538,585
Spain	Value	1,344,160	2,100,051	2,509,871
Austria	Value	1,057,810	1,384,011	1,642,423
Netherlands	Value	929,433	1,155,905	1,404,388
All other exporters	Value	9,541,864	12,312,199	12,822,194
Nonsubject exporters	Value	17,918,336	23,359,767	26,194,980
All reporting exporters	Value	32,626,366	42,824,352	49,133,264

Table continued.

**Table VII-13 Continued**  
**Aluminum extrusions: Global exports by exporter and period**

Shares in percent

Exporting country	Measure	2020	2021	2022
United States	Share of value	4.6	4.0	4.2
China	Share of value	22.0	22.0	21.2
Colombia	Share of value	0.7	0.8	1.1
Dominican Republic	Share of value	0.1	0.2	0.2
Ecuador	Share of value	0.1	0.2	0.2
India	Share of value	0.4	0.6	0.8
Indonesia	Share of value	0.5	0.6	0.6
Italy	Share of value	5.3	4.6	4.7
Malaysia	Share of value	0.8	1.0	1.0
Mexico	Share of value	0.8	1.1	1.4
South Korea	Share of value	1.2	1.0	1.1
Taiwan	Share of value	0.5	0.5	0.6
Thailand	Share of value	1.3	1.1	1.0
Turkey	Share of value	4.3	5.3	6.1
United Arab Emirates	Share of value	1.0	1.0	1.0
Vietnam	Share of value	1.3	1.3	1.6
Subject exporters	Share of value	40.5	41.4	42.5
Germany	Share of value	11.2	10.6	10.7
Poland	Share of value	4.3	4.4	5.2
Spain	Share of value	4.1	4.9	5.1
Austria	Share of value	3.2	3.2	3.3
Netherlands	Share of value	2.8	2.7	2.9
All other exporters	Share of value	29.2	28.8	26.1
Nonsubject exporters	Share of value	54.9	54.5	53.3
All reporting exporters	Share of value	100.0	100.0	100.0

Source: Official exports statistics and official global imports statistics from Vietnam (constructed exports) under HS subheadings 7604.10, 7604.21, 7604.29, 7608.10, 7608.20, 7609.00, 7610.10, 7610.90 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed October 18, 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.

**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
88 FR 71020, October 4, 2023	<i>Aluminum Extrusions From China, Colombia, Dominican Republic, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, South Korea, Taiwan, Thailand, Turkey, United Arab Emirates, and Vietnam; Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2023-10-13/pdf/2023-22519.pdf">https://www.govinfo.gov/content/pkg/FR-2023-10-13/pdf/2023-22519.pdf</a>
88 FR 74421, October 31, 2023	<i>Aluminum Extrusions From the People’s Republic of China, Colombia, the Dominican Republic, Ecuador, India, Indonesia, Italy, the Republic of Korea, Malaysia, Mexico, Taiwan, Thailand, the Republic of Turkey, the United Arab Emirates, and the Socialist Republic of Vietnam: Initiation of Less- Than-Fair-Value Investigations</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2023-10-31/pdf/2023-23962.pdf">https://www.govinfo.gov/content/pkg/FR-2023-10-31/pdf/2023-23962.pdf</a>
88 FR 74433, October 31, 2023	<i>Aluminum Extrusions From the People’s Republic of China, Indonesia, Mexico, and the Republic of Turkey: Initiation of Countervailing Duty Investigations</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2023-10-31/pdf/2023-23961.pdf">https://www.govinfo.gov/content/pkg/FR-2023-10-31/pdf/2023-23961.pdf</a>





**APPENDIX B**

**LIST OF STAFF CONFERENCE WITNESSES**



## CALENDAR OF PUBLIC PRELIMINARY CONFERENCE

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

**Subject:** Aluminum Extrusions from China, Colombia, Dominican Republic, Ecuador, India, Indonesia, Italy, Malaysia, Mexico, South Korea, Taiwan, Thailand, Turkey, United Arab Emirates, and Vietnam

**Inv. Nos.:** 701-TA-695-698 and 731-TA-1643-1657 (Preliminary)

**Date and Time:** October 25, 2023 - 9:30 a.m.

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

### **EMBASSY APPEARANCE:**

**European Union  
Delegation to the United States of America  
Washington, DC**

**Peter Young, Minister Counsellor, Deputy Head of Section – Trade and Agriculture**

### **OPENING REMARKS:**

In Support of Imposition (**Laura El-Sabaawi**, Wiley Rein LLP)  
In Opposition to Imposition (**Jack A. Levy**, Rock Creek Trade LLP and  
**Douglas J. Heffner**, Faegre Drinker Biddle & Reath LLP)

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

Wiley Rein LLP  
Washington, DC  
on behalf of

U.S. Aluminum Extruders Coalition (“the Coalition”)  
the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy,  
Allied Industrial and Service Workers  
International Union (“USW”)

**Steve Dillett**, Chief Executive Officer, Custom Aluminum Products

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

**W. Brook Hamilton (remote witness)**, President, Bonnell Aluminum

**Brook Massey**, President, MI Metals

**Bennett McEvoy**, Chief Executive Officer, Western Extrusions

**Mike Adams**, Executive Vice President,  
Product and Manufacturing Engineering, Brazeway LLC

**Jason Weber**, Vice President Operations and Government Affairs,  
Aluminum Extruders Council

**Roy Houseman**, Legislative Director, United Steel, Paper and Forestry,  
Rubber, Manufacturing, Energy, Allied Industrial and Service Workers  
International Union

**Seth Kaplan**, President, International Economic Research LLC

**Nathan Smith**, Research Analyst, Capital Trade

**Robert E. DeFrancesco, III** )  
**Laura El-Sabaawi** ) – OF COUNSEL  
**Elizabeth S. Lee** )

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

Rock Creek Trade LLP  
Washington, DC  
on behalf of

Coalition for Fair Mexican Exports of Aluminum Extrusions (“Coalition”)

**Mauricio Martinez Garza**, Director of Supply Chain, INDALUM SA de CV

**Jorge Gonzalez**, VP of Sales and Marketing, CUPRUM SA de CV

**Gino Colonna**, Director of Commercial & Business Strategy,  
Aluminio de Baja California SA de CV

**Pedro Pratdesaba**, Director of Exports, Aluminio Texcoco SA de CV

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

**John Teller**, VP of Operations, Deckorators

**Jack A. Levy** ) – OF COUNSEL

Buchanan Ingersoll & Rooney PC  
Washington, DC  
on behalf of

Hydro Precision Tubing USA, LLC

**Peter P. Vander Velde**, Vice President Head of Legal, Precision Tubing,  
Hydro Extruded Solutions

**Jeffrey L. Insalaco**, Vice President, Head of North America,  
Hydro Precision Tubing

**Daniel B. Pickard** ) – OF COUNSEL

HUSCH BLACKWELL LLP  
Washington, DC  
on behalf of

Reflection Window + Wall, LLC

**Daniel R. Wilson** )  
**Jeffrey S. Neeley** ) – OF COUNSEL  
**Robert D. Stang** )

Clark Hill  
Washington, DC  
on behalf of

MAHLE Behr USA, Inc.

**Nicoletta Milanesio Berrino**, General Counsel and Corporate Secretary,  
MAHLE Industries, Incorporated

**Dale Sharp**, Senior Commodity Manager, Raw Material & Electrical,  
MAHLE Industries, Incorporated

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

**Chris Heineman**, Director of Purchasing, MAHLE Industries, Incorporated

**Mark Ludwikowski** )  
 ) – OF COUNSEL  
**Kelsey Christensen** )

Grunfeld, Desiderio, Lebowitz, Silverman and Klestadt LLP  
Washington, DC  
on behalf of

Press Metal North America

**Keith Burlingame**, President, Press Metal North America

**Kavita Mohan** ) – OF COUNSEL

Faegre Drinker Biddle & Reath LLP  
Washington, DC  
on behalf of

Johnson Controls Inc. (and its affiliates Air Systems Components Inc., Ruskin Company,  
York International Corp., and Tyco Fire & Security GmbH)  
Danfoss LLC, Streamlight Inc., Bracalente Manufacturing Co., Inc.,  
Bracalente Metal Products (Suzhou) Co., Ltd., and Enclos Corp.

**Douglas J. Heffner** )  
 ) – OF COUNSEL  
**Richard P. Ferrin** )

**REBUTTAL/CLOSING REMARKS:**

In Support of Imposition (**Robert E. DeFrancesco, III**, Wiley Rein LLP)  
In Opposition to Imposition (**Jack A. Levy**, Rock Creek Trade LLP)

**APPENDIX C**  
**SUMMARY DATA**

Table C-1: Aluminum extrusions: Summary data concerning the U.S. market..... C-3

Table C-2: Aluminum extrusions: Summary data concerning the U.S. market  
excluding one U.S. producer \*\*\* ..... C-7



## All U.S. producers

**Table C-1**

**Aluminum extrusions: Summary data concerning the U.S. market, by item and period**

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; 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
<b>U.S. consumption quantity:</b>									
Amount.....	1,904,192	2,280,003	2,392,725	1,241,172	1,086,596	▲25.7	▲19.7	▲4.9	▼(12.5)
Producers' share (fn1).....	60.2	56.7	53.4	54.9	53.7	▼(6.8)	▼(3.5)	▼(3.3)	▼(1.2)
<b>Importers' share (fn1):</b>									
China, subject.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Colombia.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Dominican Republic (DR).....	***	***	***	***	***	▲***	▲***	▼***	▲***
Ecuador.....	***	***	***	***	***	▲***	▲***	▲***	▲***
India.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Indonesia.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Italy.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Malaysia.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Mexico.....	***	***	***	***	***	▲***	▲***	▲***	▲***
South Korea.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Taiwan.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Thailand.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Turkey.....	***	***	***	***	***	▲***	▲***	▲***	▼***
United Arab Emirates.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Vietnam.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Subject sources.....	28.4	32.0	36.2	34.7	35.4	▲7.8	▲3.6	▲4.2	▲0.7
Subject sources less DR.....	***	***	***	***	***	▲***	▲***	▲***	▲***
China, nonsubject.....	***	***	***	***	***	▼***	▼***	▼***	▲***
All other sources.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Nonsubject sources.....	11.3	11.3	10.3	10.4	10.9	▼(1.0)	▼(0.0)	▼(1.0)	▲0.5
Nonsubject sources plus DR.....	***	***	***	***	***	▼***	▲***	▼***	▲***
All import sources less DR.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources.....	39.8	43.3	46.6	45.1	46.3	▲6.8	▲3.5	▲3.3	▲1.2
<b>U.S. consumption value:</b>									
Amount.....	8,647,499	11,724,354	14,874,366	7,806,061	6,453,516	▲72.0	▲35.6	▲26.9	▼(17.3)
Producers' share (fn1).....	54.0	54.8	53.6	56.2	52.7	▼(0.4)	▲0.8	▼(1.2)	▼(3.5)
<b>Importers' share (fn1):</b>									
China, subject.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Colombia.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Dominican Republic (DR).....	***	***	***	***	***	▲***	▲***	▼***	▲***
Ecuador.....	***	***	***	***	***	▲***	▲***	▲***	▲***
India.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Indonesia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Italy.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Malaysia.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Mexico.....	***	***	***	***	***	▲***	▲***	▲***	▲***
South Korea.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Taiwan.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Thailand.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Turkey.....	***	***	***	***	***	▲***	▲***	▲***	▼***
United Arab Emirates.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Vietnam.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Subject sources.....	30.3	30.1	33.0	30.7	32.3	▲2.8	▼(0.1)	▲2.9	▲1.6
Subject sources less DR.....	***	***	***	***	***	▲***	▼***	▲***	▲***
China, nonsubject.....	***	***	***	***	***	▼***	▼***	▼***	▲***
All other sources.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Nonsubject sources.....	15.7	15.0	13.3	13.1	15.0	▼(2.4)	▼(0.7)	▼(1.7)	▲1.9
Nonsubject sources plus DR.....	***	***	***	***	***	▼***	▼***	▼***	▲***
All import sources less DR.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources.....	46.0	45.2	46.4	43.8	47.3	▲0.4	▼(0.8)	▲1.2	▲3.5
<b>U.S. imports from:</b>									
<b>China, subject:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
<b>Colombia:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▲***	▼***	▼***

Table continued.

Table C-1 Continued

Aluminum extrusions: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; 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. imports from: Continued									
Dominican Republic (DR):									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	***	***
Ecuador:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
India:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Indonesia:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Italy:									
Quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Malaysia:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Mexico:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
South Korea:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Taiwan:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Thailand:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Turkey:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
United Arab Emirates:									
Quantity.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Vietnam:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***

Table continued.

**Table C-1 Continued**

**Aluminum extrusions: Summary data concerning the U.S. market, by item and period**

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; 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
<b>U.S. imports from: Continued</b>									
Subject sources:									
Quantity.....	541,410	729,656	866,638	430,369	384,514	▲60.1	▲34.8	▲18.8	▼(10.7)
Value.....	2,617,466	3,534,854	4,914,217	2,396,349	2,084,600	▲87.7	▲35.0	▲39.0	▼(13.0)
Unit value.....	\$4,835	\$4,845	\$5,670	\$5,568	\$5,421	▲17.3	▲0.2	▲17.0	▼(2.6)
Ending inventory quantity.....	28,962	34,643	44,369	32,879	32,180	▲53.2	▲19.6	▲28.1	▼(2.1)
Subject sources less DR:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
China, nonsubject:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All other sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources:									
Quantity.....	216,104	257,630	247,598	129,427	118,523	▲14.6	▲19.2	▼(3.9)	▼(8.4)
Value.....	1,357,864	1,761,347	1,981,383	1,018,837	967,274	▲45.9	▲29.7	▲12.5	▼(5.1)
Unit value.....	\$6,283	\$6,837	\$8,002	\$7,872	\$8,161	▲27.4	▲8.8	▲17.1	▲3.7
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources plus DR:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▲***	▲***
All import sources less DR:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources:									
Quantity.....	757,515	987,286	1,114,236	559,797	503,038	▲47.1	▲30.3	▲12.9	▼(10.1)
Value.....	3,975,330	5,296,201	6,895,601	3,415,186	3,051,875	▲73.5	▲33.2	▲30.2	▼(10.6)
Unit value.....	\$5,248	\$5,364	\$6,189	\$6,101	\$6,067	▲17.9	▲2.2	▲15.4	▼(0.6)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
<b>U.S. producers':</b>									
Practical capacity quantity.....	1,607,519	1,665,079	1,695,110	844,057	861,422	▲5.4	▲3.6	▲1.8	▲2.1
Production quantity.....	1,197,050	1,376,980	1,358,188	727,304	619,459	▲13.5	▲15.0	▼(1.4)	▼(14.8)
Capacity utilization (fn1).....	74.5	82.7	80.1	86.2	71.9	▲5.7	▲8.2	▼(2.6)	▼(14.3)
<b>U.S. shipments:</b>									
Quantity.....	1,146,677	1,292,717	1,278,489	681,375	583,558	▲11.5	▲12.7	▼(1.1)	▼(14.4)
Value.....	4,672,169	6,428,153	7,978,765	4,390,875	3,401,641	▲70.8	▲37.6	▲24.1	▼(22.5)
Unit value.....	\$4,075	\$4,973	\$6,241	\$6,444	\$5,829	▲53.2	▲22.0	▲25.5	▼(9.5)
<b>Export shipments:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	43,889	51,749	61,142	60,838	56,937	▲39.3	▲17.9	▲18.2	▼(6.4)
Inventories/total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Production workers.....	13,252	14,293	15,168	15,469	14,359	▲14.5	▲7.9	▲6.1	▼(7.2)
Hours worked (1,000s).....	28,072	30,458	31,836	20,932	20,427	▲13.4	▲8.5	▲4.5	▼(2.4)
Wages paid (\$1,000).....	790,693	927,426	1,014,720	512,477	495,651	▲28.3	▲17.3	▲9.4	▼(3.3)
Hourly wages (dollars per hour).....	\$28.17	\$30.45	\$31.87	\$24.48	\$24.26	▲13.2	▲8.1	▲4.7	▼(0.9)
Productivity (short tons per 1,000 hours).....	42.6	45.2	42.7	34.7	30.3	▲0.0	▲6.0	▼(5.6)	▼(12.7)
Unit labor costs.....	\$661	\$674	\$747	\$705	\$800	▲13.1	▲2.0	▲10.9	▲13.6

Table continued.

**Table C-1 Continued**

**Aluminum extrusions: Summary data concerning the U.S. market, by item and period**

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; 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': Continued									
Net sales:									
Quantity.....	1,200,761	1,362,095	1,340,972	715,281	617,678	▲11.7	▲13.4	▼(1.6)	▼(13.6)
Value.....	4,867,762	6,730,278	8,316,999	4,580,962	3,568,408	▲70.9	▲38.3	▲23.6	▼(22.1)
Unit value.....	\$4,054	\$4,941	\$6,202	\$6,404	\$5,777	▲53.0	▲21.9	▲25.5	▼(9.8)
Cost of goods sold (COGS).....	4,234,350	5,955,332	7,363,685	4,011,833	3,110,470	▲73.9	▲40.6	▲23.6	▼(22.5)
Gross profit or (loss) (fn2).....	633,412	774,946	953,314	569,129	457,938	▲50.5	▲22.3	▲23.0	▼(19.5)
SG&A expenses.....	300,196	347,945	404,155	200,076	204,376	▲34.6	▲15.9	▲16.2	▲2.1
Operating income or (loss) (fn2).....	333,216	427,001	549,159	369,053	253,562	▲64.8	▲28.1	▲28.6	▼(31.3)
Net income or (loss) (fn2).....	315,161	399,661	525,497	357,020	232,365	▲66.7	▲26.8	▲31.5	▼(34.9)
Unit COGS.....	\$3,526	\$4,372	\$5,491	\$5,609	\$5,036	▲55.7	▲24.0	▲25.6	▼(10.2)
Unit SG&A expenses.....	\$250	\$255	\$301	\$280	\$331	▲20.6	▲2.2	▲18.0	▲18.3
Unit operating income or (loss) (fn2).....	\$278	\$313	\$410	\$516	\$411	▲47.6	▲13.0	▲30.6	▼(20.4)
Unit net income or (loss) (fn2).....	\$262	\$293	\$392	\$499	\$376	▲49.3	▲11.8	▲33.6	▼(24.6)
COGS/sales (fn1).....	87.0	88.5	88.5	87.6	87.2	▲1.6	▲1.5	▲0.1	▼(0.4)
Operating income or (loss)/sales (fn1).....	6.8	6.3	6.6	8.1	7.1	▼(0.2)	▼(0.5)	▲0.3	▼(1.0)
Net income or (loss)/sales (fn1).....	6.5	5.9	6.3	7.8	6.5	▼(0.2)	▼(0.5)	▲0.4	▼(1.3)
Capital expenditures.....	201,674	305,038	318,658	141,118	116,077	▲58.0	▲51.3	▲4.5	▼(17.7)
Research and development expenses.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Net assets.....	2,383,780	3,104,479	3,307,753	NA	NA	▲38.8	▲30.2	▲6.5	NA

Source: Producer data are compiled from data submitted in response to Commission questionnaires. Import data are compiled from U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080, accessed November 8, 2023, adjusted using data submitted in response to Commission questionnaires to report China subject vs. nonsubject data and to add in additional volumes of in-scope imports reported by USITC questionnaire respondents that were entered in under other HTS statistical reporting numbers than those listed above. The import data in this table do not exclude out-of-scope merchandise for companies that certified in response to USITC questionnaires that they do not import aluminum extrusions. Imports for all data sources are based on the imports for consumption data series and 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.

## Related party exclusion

**Table C-2**

**Aluminum extrusions: Summary data concerning the U.S. market excluding one U.S. producer \*\*\*, by item and period**

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; 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	
<b>U.S. consumption quantity:</b>										
Amount.....	1,904,192	2,280,003	2,392,725	1,241,172	1,086,596	▲25.7	▲19.7	▲4.9	▼(12.5)	
<b>Producers' share (fn1)</b>										
Included producers.....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Excluded producers.....	***	***	***	***	***	▼***	▼***	▲***	▲***	
All producers.....	60.2	56.7	53.4	54.9	53.7	▼(6.8)	▼(3.5)	▼(3.3)	▼(1.2)	
<b>Importers' share (fn1):</b>										
China, subject.....	***	***	***	***	***	▼***	▲***	▼***	▲***	
Colombia.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
Dominican Republic (DR).....	***	***	***	***	***	▲***	▲***	▼***	▲***	
Ecuador.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
India.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
Indonesia.....	***	***	***	***	***	▲***	▲***	▼***	▼***	
Italy.....	***	***	***	***	***	▼***	▼***	▲***	▲***	
Malaysia.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
Mexico.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
South Korea.....	***	***	***	***	***	▲***	▲***	▲***	▼***	
Taiwan.....	***	***	***	***	***	▲***	▲***	▲***	▼***	
Thailand.....	***	***	***	***	***	▼***	▼***	▲***	▼***	
Turkey.....	***	***	***	***	***	▲***	▲***	▲***	▼***	
United Arab Emirates.....	***	***	***	***	***	▲***	▼***	▲***	▼***	
Vietnam.....	***	***	***	***	***	▲***	▲***	▲***	▼***	
Subject sources.....	28.4	32.0	36.2	34.7	35.4	▲7.8	▲3.6	▲4.2	▲0.7	
Subject sources less DR.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
China, nonsubject.....	***	***	***	***	***	▼***	▼***	▼***	▲***	
All other sources.....	***	***	***	***	***	▼***	▼***	▼***	▲***	
Nonsubject sources.....	11.3	11.3	10.3	10.4	10.9	▼(1.0)	▼(0.0)	▼(1.0)	▲0.5	
Nonsubject sources plus DR.....	***	***	***	***	***	▼***	▲***	▼***	▲***	
All import sources less DR.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
All import sources.....	39.8	43.3	46.6	45.1	46.3	▲6.8	▲3.5	▲3.3	▲1.2	
<b>U.S. consumption value:</b>										
Amount.....	8,647,499	11,724,354	14,874,366	7,806,061	6,453,516	▲72.0	▲35.6	▲26.9	▼(17.3)	
<b>Producers' share (fn1)</b>										
Included producers.....	***	***	***	***	***	▼***	▲***	▼***	▼***	
Excluded producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***	
All producers.....	54.0	54.8	53.6	56.2	52.7	▼(0.4)	▲0.8	▼(1.2)	▼(3.5)	
<b>Importers' share (fn1):</b>										
China, subject.....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Colombia.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
Dominican Republic (DR).....	***	***	***	***	***	▲***	▲***	▼***	▲***	
Ecuador.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
India.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
Indonesia.....	***	***	***	***	***	▲***	▲***	▲***	▼***	
Italy.....	***	***	***	***	***	▼***	▼***	▼***	▲***	
Malaysia.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
Mexico.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
South Korea.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
Taiwan.....	***	***	***	***	***	▲***	▲***	▲***	▼***	
Thailand.....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Turkey.....	***	***	***	***	***	▲***	▲***	▲***	▼***	
United Arab Emirates.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
Vietnam.....	***	***	***	***	***	▲***	▲***	▲***	▼***	
Subject sources.....	30.3	30.1	33.0	30.7	32.3	▲2.8	▼(0.1)	▲2.9	▲1.6	
Subject sources less DR.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
China, nonsubject.....	***	***	***	***	***	▼***	▼***	▼***	▲***	
All other sources.....	***	***	***	***	***	▼***	▼***	▼***	▲***	
Nonsubject sources.....	15.7	15.0	13.3	13.1	15.0	▼(2.4)	▼(0.7)	▼(1.7)	▲1.9	
Nonsubject sources plus DR.....	***	***	***	***	***	▼***	▼***	▼***	▲***	
All import sources less DR.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
All import sources.....	46.0	45.2	46.4	43.8	47.3	▲0.4	▼(0.8)	▲1.2	▲3.5	

Table continued.

Table C-2 Continued

Aluminum extrusions: Summary data concerning the U.S. market excluding one U.S. producer \*\*\*, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; 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. imports from:									
China, subject:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Colombia:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Dominican Republic (DR):									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	***	***
Ecuador:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
India:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Indonesia:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Italy:									
Quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Malaysia:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Mexico:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
South Korea:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Taiwan:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Thailand:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Turkey:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***

Table continued.

Table C-2 Continued

Aluminum extrusions: Summary data concerning the U.S. market excluding one U.S. producer \*\*\*, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; 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. imports from: Continued									
United Arab Emirates:									
Quantity.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Vietnam:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources:									
Quantity.....	541,410	729,656	866,638	430,369	384,514	▲60.1	▲34.8	▲18.8	▼(10.7)
Value.....	2,617,466	3,534,854	4,914,217	2,396,349	2,084,600	▲87.7	▲35.0	▲39.0	▼(13.0)
Unit value.....	\$4,835	\$4,845	\$5,670	\$5,568	\$5,421	▲17.3	▲0.2	▲17.0	▼(2.6)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Subject sources less DR:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
China, nonsubject:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All other sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources:									
Quantity.....	216,104	257,630	247,598	129,427	118,523	▲14.6	▲19.2	▼(3.9)	▼(8.4)
Value.....	1,357,864	1,761,347	1,981,383	1,018,837	967,274	▲45.9	▲29.7	▲12.5	▼(5.1)
Unit value.....	\$6,283	\$6,837	\$8,002	\$7,872	\$8,161	▲27.4	▲8.8	▲17.1	▲3.7
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources plus DR:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▲***	▲***
All import sources less DR:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources:									
Quantity.....	757,515	987,286	1,114,236	559,797	503,038	▲47.1	▲30.3	▲12.9	▼(10.1)
Value.....	3,975,330	5,296,201	6,895,601	3,415,186	3,051,875	▲73.5	▲33.2	▲30.2	▼(10.6)
Unit value.....	\$5,248	\$5,364	\$6,189	\$6,101	\$6,067	▲17.9	▲2.2	▲15.4	▼(0.6)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Included 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).....	***	***	***	***	***	▲***	▲***	▲***	▲***

Table continued.

**Table C-2 Continued**

**Aluminum extrusions: Summary data concerning the U.S. market excluding one U.S. producer \*\*\*, by item and period**

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; 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
Included U.S. producers': Continued									
Production workers.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Hours worked (1,000s).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Wages paid (\$1,000).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Hourly wages (dollars per hour).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Productivity (short tons per 1,000 hours)..	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit labor costs.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Net sales:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Gross profit or (loss) (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: Producer data are compiled from data submitted in response to Commission questionnaires. Import data are compiled from U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080, accessed November 8, 2023, adjusted using data submitted in response to Commission questionnaires to report China subject vs. nonsubject data and to add in additional volumes of in-scope imports reported by USITC questionnaire respondents that were entered in under other HTS statistical reporting numbers than those listed above. The import data in this table do not exclude out-of-scope merchandise for companies that certified in response to USITC questionnaires that they do not import aluminum extrusions. Imports for all data sources are based on the imports for consumption data series and value data reflect landed duty-paid values. 508-compliant tables containing these data available upon request.

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**

**DOMESTIC LIKE PRODUCT NARRATIVES**



**Table D-1**

**Aluminum extrusions: U.S. producer's narratives regarding the domestic like product factors comparing in-scope finished heat sinks to all other in-scope aluminum extrusions**

<b>Factor</b>	<b>Producer name and narrative on the domestic like product factors</b>
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***

Factor	Producer name and narrative on the domestic like product factors
Physical characteristics	***
Physical characteristics	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***

Factor	Producer name and narrative on the domestic like product factors
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***

Factor	Producer name and narrative on the domestic like product factors
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***

Factor	Producer name and narrative on the domestic like product factors
Manufacturing	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***

Factor	Producer name and narrative on the domestic like product factors
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***

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



**Table D-2**

**Aluminum extrusions: U.S. importer's narratives regarding the domestic like product factors comparing in-scope finished heat sinks to all other in-scope aluminum extrusions**

<b>Factor</b>	<b>Importer name and narrative on the domestic like product factors</b>
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***

Factor	Importer name and narrative on the domestic like product factors
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Manufacturing	***
Manufacturing	***
Manufacturing	***

Factor	Importer name and narrative on the domestic like product factors
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Price	***
Price	***

Factor	Importer name and narrative on the domestic like product factors
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***

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

**APPENDIX E**

**SHIPMENTS BY SERIES AND FINISH DETAIL**



**Table E-1**  
**Aluminum extrusions: U.S. producers' U.S. shipments, by series and finish type, 2022**

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton

<b>Series</b>	<b>Measure</b>	<b>Anodized / special</b>	<b>Unworked</b>	<b>All finishes</b>
1000 series	Quantity	***	***	***
3000 series	Quantity	***	***	***
5000 series	Quantity	***	***	***
6000 series	Quantity	***	***	***
All series	Quantity	***	***	***
1000 series	Value	***	***	***
3000 series	Value	***	***	***
5000 series	Value	***	***	***
6000 series	Value	***	***	***
All series	Value	***	***	***
1000 series	Unit value	***	***	***
3000 series	Unit value	***	***	***
5000 series	Unit value	***	***	***
6000 series	Unit value	***	***	***
All series	Unit value	***	***	***

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

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

**Table E-2**  
**Aluminum extrusions: U.S. importers' U.S. shipments of imports from subject sources, by series and finish type, 2022**

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton

<b>Series</b>	<b>Measure</b>	<b>Anodized / special</b>	<b>Unworked</b>	<b>All finishes</b>
1000 series	Quantity	***	***	***
3000 series	Quantity	***	***	***
5000 series	Quantity	***	***	***
6000 series	Quantity	***	***	***
All series	Quantity	***	***	***
1000 series	Value	***	***	***
3000 series	Value	***	***	***
5000 series	Value	***	***	***
6000 series	Value	***	***	***
All series	Value	***	***	***
1000 series	Unit value	***	***	***
3000 series	Unit value	***	***	***
5000 series	Unit value	***	***	***
6000 series	Unit value	***	***	***
All series	Unit value	***	***	***

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

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



**Table E-3**  
**Aluminum extrusions: U.S. importers' U.S. shipments of imports from nonsubject sources, by series and finish type, 2022**

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton

<b>Series</b>	<b>Measure</b>	<b>Anodized / special</b>	<b>Unworked</b>	<b>All finishes</b>
1000 series	Quantity	***	***	***
3000 series	Quantity	***	***	***
5000 series	Quantity	***	***	***
6000 series	Quantity	***	***	***
All series	Quantity	***	***	***
1000 series	Value	***	***	***
3000 series	Value	***	***	***
5000 series	Value	***	***	***
6000 series	Value	***	***	***
All series	Value	***	***	***
1000 series	Unit value	***	***	***
3000 series	Unit value	***	***	***
5000 series	Unit value	***	***	***
6000 series	Unit value	***	***	***
All series	Unit value	***	***	***

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

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

**Table E-4**  
**Aluminum extrusions: U.S. importers' U.S. shipments of imports from all import sources, by series and finish type, 2022**

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton

<b>Series</b>	<b>Measure</b>	<b>Anodized / special</b>	<b>Unworked</b>	<b>All finishes</b>
1000 series	Quantity	***	***	***
3000 series	Quantity	***	***	***
5000 series	Quantity	***	***	***
6000 series	Quantity	***	***	***
All series	Quantity	***	***	***
1000 series	Value	***	***	***
3000 series	Value	***	***	***
5000 series	Value	***	***	***
6000 series	Value	***	***	***
All series	Value	***	***	***
1000 series	Unit value	***	***	***
3000 series	Unit value	***	***	***
5000 series	Unit value	***	***	***
6000 series	Unit value	***	***	***
All series	Unit value	***	***	***

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

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

**APPENDIX F**  
**ADDITIONAL NEGLIGIBILITY TABLE**



**Table F-1****Aluminum extrusions: U.S. imports in the twelve-month period preceding the filing of the petition, October 2022 through September 2023**

Quantity in short tons; share of quantity in percent

Source of imports	Investigation type	Quantity	Share of quantity	Share of individually negligible sources
China, subject	AD/CVD	***	***	***
Colombia	AD	74,627	10.0	---
Dominican Republic (DR)	AD	23,165	3.1	---
Ecuador	AD	19,109	2.6	2.6
India	AD	22,807	3.1	---
Indonesia	AD/CVD	29,056	3.9	---
Italy	AD	17,364	2.3	2.3
Malaysia	AD	13,241	1.8	1.8
Mexico	AD/CVD	103,656	13.9	---
South Korea	AD	10,254	1.4	1.4
Taiwan	AD	6,500	0.9	0.9
Thailand	AD	10,432	1.4	1.4
Turkey	AD/CVD	27,131	3.6	---
United Arab Emirates	AD	3,524	0.5	0.5
Vietnam	AD	54,309	7.3	---
Subject sources	Not applicable	***	***	***
Subject sources less DR	Not applicable	***	***	***
China, nonsubject	Not applicable	***	***	NA
All other sources	Not applicable	231,917	31.2	NA
Nonsubject sources	Not applicable	***	***	NA
Nonsubject sources plus DR	Not applicable	***	***	NA
All import sources	Not applicable	743,698	100.0	NA

Source: Compiled from U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 7604.10.1000, 7604.10.3000, 7604.10.5000, 7604.21.0010, 7604.21.0090, 7604.29.1010, 7604.29.1090, 7604.29.3060, 7604.29.3090, 7604.29.5050, 7604.29.5090, 7608.10.0030, 7608.10.0090, 7608.20.0030, 7608.20.0090, 7609.00.0000, 7610.10.0010, 7610.10.0020, 7610.10.0030, 7610.90.0040 and 7610.90.0080, accessed November 8, 2023, adjusted using data submitted in response to Commission questionnaires to report China subject vs. nonsubject data. Imports are based on the imports for consumption data series from all data sources.

**Table F-1 Continued**

**Aluminum extrusions: U.S. imports in the twelve-month period preceding the filing of the petition, October 2022 through September 2023**

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 "--". No adjustment to add data reported as in-scope merchandise under other HTS numbers was made. Data above are only for the primary HTS numbers. Additionally, the import data in this table do not exclude out-of-scope merchandise for companies that certified in response to USITC questionnaires that they do not import aluminum extrusions, and also do not exclude data submitted in response to Commission questionnaires for products other than aluminum extrusions.

**APPENDIX G**

**APPENDIX FOR PART VI**





**Table G-1**  
**Aluminum extrusions: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Net sales quantity**

Quantity in short tons

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
All firms	1,200,761	1,362,095	1,340,972	715,281	617,678

Table continued.

**Table G-1 Continued**  
**Aluminum extrusions: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Net sales value**

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>
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
<b>All firms</b>	<b>4,867,762</b>	<b>6,730,278</b>	<b>8,316,999</b>	<b>4,580,962</b>	<b>3,568,408</b>

Table continued.

**Table G-1 Continued**  
**Aluminum extrusions: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**COGS**

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>
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
<b>All firms</b>	<b>4,234,350</b>	<b>5,955,332</b>	<b>7,363,685</b>	<b>4,011,833</b>	<b>3,110,470</b>

Table continued.

**Table G-1 Continued**

**Aluminum extrusions: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Gross profit or (loss)**

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>
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
All firms	633,412	774,946	953,314	569,129	457,938

Table continued.

**Table G-1 Continued**  
**Aluminum extrusions: U.S. producers' sales, costs/expenses, and profitability, by firm and period**  
**SG&A expenses**

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>
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
<b>All firms</b>	<b>300,196</b>	<b>347,945</b>	<b>404,155</b>	<b>200,076</b>	<b>204,376</b>

Table continued.

**Table G-1 Continued**  
**Aluminum extrusions: 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
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
All firms	333,216	427,001	549,159	369,053	253,562

Table continued.

**Table G-1 Continued**  
**Aluminum extrusions: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Net income or (loss)**

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>
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
<b>All firms</b>	<b>315,161</b>	<b>399,661</b>	<b>525,497</b>	<b>357,020</b>	<b>232,365</b>

Table continued.

**Table G-1 Continued**  
**Aluminum extrusions: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**COGS to net sales ratio**

Ratio in percent

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
All firms	87.0	88.5	88.5	87.6	87.2

Table continued.



**Table G-1 Continued**  
**Aluminum extrusions: U.S. producers' sales, costs/expenses, and profitability, by firm and period**  
**Gross profit or (loss) to net sales ratio**

Ratio in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
All firms	13.0	11.5	11.5	12.4	12.8

Table continued.

**Table G-1 Continued**  
**Aluminum extrusions: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**SG&A expenses to net sales ratio**

Ratio in percent

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
All firms	6.2	5.2	4.9	4.4	5.7

Table continued.

**Table G-1 Continued**  
**Aluminum extrusions: U.S. producers' sales, costs/expenses, and profitability, by firm and period**  
**Operating income or (loss) to net sales ratio**

Ratio in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
All firms	6.8	6.3	6.6	8.1	7.1

Table continued.

**Table G-1 Continued**

**Aluminum extrusions: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Net income or (loss) to net sales ratio**

Ratio in percent

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
All firms	6.5	5.9	6.3	7.8	6.5

Table continued.

**Table G-1 Continued**

**Aluminum extrusions: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit net sales value**

Unit value in dollars per short ton

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
All firms	4,054	4,941	6,202	6,404	5,777

Table continued.

**Table G-1 Continued**

**Aluminum extrusions: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit total raw materials cost**

Unit value in dollars per short ton

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
All firms	2,069	2,833	3,717	3,972	3,186

Table continued.

**Table G-1 Continued**

**Aluminum extrusions: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit direct labor cost**

Unit value in dollars per short ton

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
All firms	482	512	578	560	617

Table continued.

**Table G-1 Continued**

**Aluminum extrusions: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit other factory costs**

Unit value in dollars per short ton

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
All firms	975	1,027	1,196	1,076	1,232

Table continued.



**Table G-1 Continued**  
**Aluminum extrusions: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit COGS**

Unit value in dollars per short ton

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
All firms	3,526	4,372	5,491	5,609	5,036

Table continued.

**Table G-1 Continued**  
**Aluminum extrusions: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit gross profit or (loss)**

Unit value in dollars per short ton

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
All firms	528	569	711	796	741

Table continued.

**Table G-1 Continued**  
**Aluminum extrusions: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit SG&A expenses**

Unit value in dollars per short ton

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
All firms	250	255	301	280	331

Table continued.

**Table G-1 Continued**

**Aluminum extrusions: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit operating income or (loss)**

Unit value in dollars per short ton

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
All firms	278	313	410	516	411

Table continued.

**Table G-1 Continued**

**Aluminum extrusions: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit net income or (loss)**

Unit value in dollars per short ton

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Jan-Jun 2022</b>	<b>Jan-Jun 2023</b>
Alexandria Industries	***	***	***	***	***
Aluminios de Puerto Rico	***	***	***	***	***
APEL Extrusions	***	***	***	***	***
Astro Shapes	***	***	***	***	***
Bonnell	***	***	***	***	***
Brazeway	***	***	***	***	***
Custom Aluminum	***	***	***	***	***
Dajcor	***	***	***	***	***
Elixir	***	***	***	***	***
Extrudex	***	***	***	***	***
Hydro Extrusion	***	***	***	***	***
Hydro Precision	***	***	***	***	***
International Extrusions	***	***	***	***	***
Jordan	***	***	***	***	***
Keymark	***	***	***	***	***
M-D Building	***	***	***	***	***
Merit	***	***	***	***	***
Mi Metals	***	***	***	***	***
Momentum	***	***	***	***	***
PC Extrusions	***	***	***	***	***
Penn	***	***	***	***	***
Pennex	***	***	***	***	***
Pries	***	***	***	***	***
Sierra Aluminum	***	***	***	***	***
Tower Extrusions	***	***	***	***	***
Western Extrusions	***	***	***	***	***
Wolverine	***	***	***	***	***
All firms	262	293	392	499	376

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



**APPENDIX H**

**DATA ON INDUSTRY IN THE DOMINICAN REPUBLIC**





**Table H-1****Aluminum extrusions: Dominican producer's installed and practical capacity and production on the same equipment as subject production, by period**

Capacity and production in short tons; 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 aluminum extrusions	Capacity	***	***	***	***	***
Practical aluminum extrusions	Production	***	***	***	***	***
Practical aluminum extrusions	Utilization	***	***	***	***	***

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

**Table H-2**  
**Aluminum extrusions: Data on the foreign industry in the Dominican Republic, by period**

Quantity in short tons

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	***	***	***	***	***	***	***

Table continued.

**Table H-2 Continued**  
**Aluminum extrusions: Data on the foreign industry in the Dominican Republic, by period**

Share and ratio in percent

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023	Projection 2023	Projection 2024
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 “---”.

