

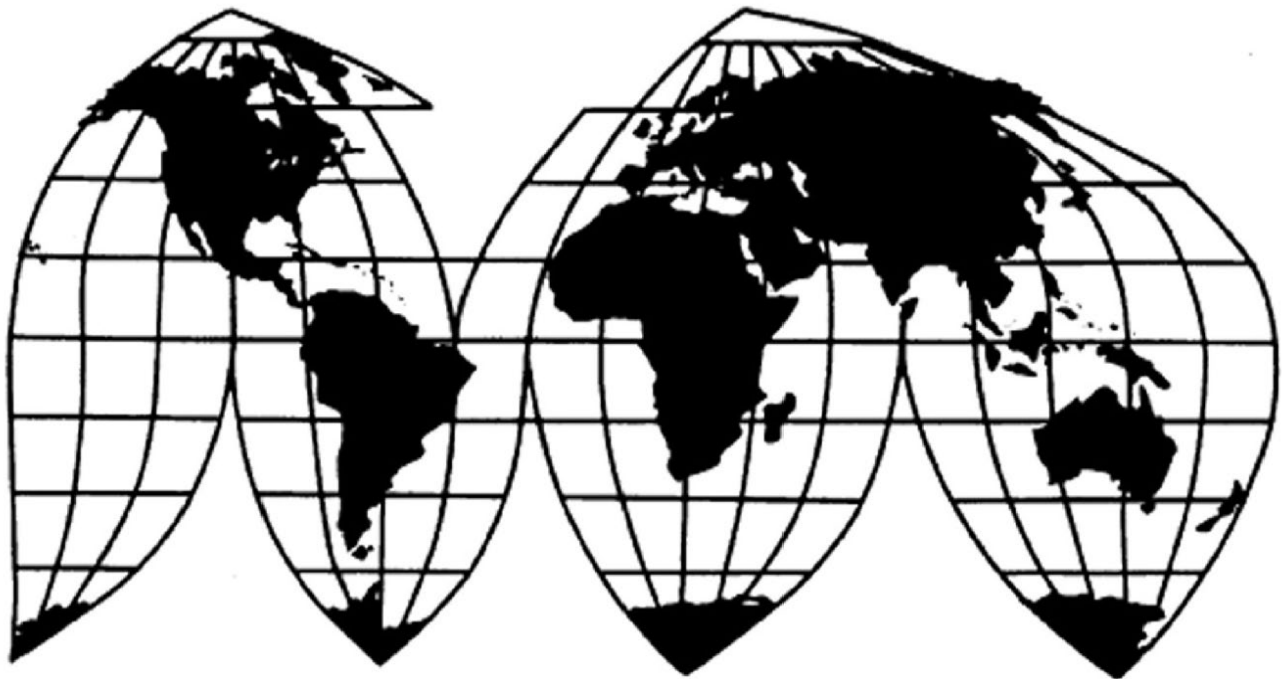
Steel Trailer Wheels from China

Investigation Nos. 701-TA-609 and 731-TA-1421 (Review)

Publication 5596

March 2025

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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Note: Information that would reveal confidential operations of individual concerns may not be published.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

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-609 and 731-TA-1421 (Review)

Steel Trailer Wheels from China

DETERMINATIONS

On the basis of the record¹ developed in the subject five-year reviews, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that revocation of the antidumping and countervailing duty orders on steel trailer wheels from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

BACKGROUND

The Commission instituted these reviews on August 1, 2024 (89 FR 62783) and determined on November 4, 2024 that it would conduct expedited reviews (89 FR 95814, December 3, 2024).

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

Views of the Commission

Based on the record in these five-year reviews, we determine under section 751(c) of the Tariff Act of 1930, as amended (“the Tariff Act”), that revocation of the antidumping and countervailing duty orders on steel trailer wheels from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

I. Background

Original Investigations. On August 8, 2018, Dexstar Wheel (“Dexstar” or “Petitioner”), a division of Americana Development, Inc. (“ADI”) filed petitions concerning imports of steel trailer wheels from China.¹ On August 22, 2019, the Commission determined that a domestic industry was materially injured by reason of imports of steel trailer wheels from China that the U.S. Department of Commerce (“Commerce”) determined were being sold at less than fair value (“LTFV”) and subsidized.² Commerce issued countervailing and antidumping duty orders on steel trailer wheels from China on September 3, 2019.³

Current Reviews. On August 1, 2024, the Commission instituted these first five-year reviews of the antidumping and countervailing duty orders on steel trailer wheels from China.⁴

¹ *Steel Trailer Wheels from China*, Inv. Nos. 701-TA-609 and 731-TA-1421 (Final), USITC Pub. 4943 (Aug. 2019) (“*Original Determination*”) at I-1.

² *Original Determination* at 1; *Steel Trailer Wheels from China; Determinations*, 84 Fed. Reg. 45172 (Aug. 28, 2019).

³ *Steel Trailer Wheels from China: Countervailing Duty Order*, 84 Fed. Reg. 45952 (Sept. 3, 2019); *Steel Trailer Wheels from China: Antidumping Duty Order*, 84 Fed. Reg. 45952 (Sept. 3, 2019).

⁴ *Steel Trailer Wheels from China: Institution of a Five-Year Review*, 89 Fed. Reg. 62783 (Aug. 1, 2024).

Dexstar filed the sole response to the notice of institution on September 3, 2024.⁵ The Commission did not receive a response from any respondent interested party.⁶ On November 4, 2024, the Commission determined that the domestic industry party group response was adequate and that the respondent interested party group response was inadequate.⁷ Finding no other circumstances that would warrant conducting full reviews, the Commission determined that it would conduct expedited reviews of the orders.⁸ Dexstar submitted final comments pursuant to 19 C.F.R. § 207.61(d) arguing that the Commission should reach an affirmative determination.⁹

U.S. industry data in these reviews are based on information provided in response to the notice of institution by Dexstar, which accounted for approximately 100 percent of production of steel trailer wheels in the United States, and publicly available information compiled by the Commission.¹⁰ U.S. import data and related information are based on official Commerce

⁵ Dexstar's Response to the Notice of Institution, EDIS Doc. Nos. 831333 (confidential version) & 831334 (public version) (Sept. 3, 2024) ("Dexstar's NOI Response").

⁶ Confidential Staff Report: Steel Trailer Wheels, INV-WW-132, EDIS Doc. 835488 at I-15 (Oct. 23, 2024) ("CR"); Public Report ("PR"), *Steel Trailer Wheels from China*, Inv. Nos. 701-TA-609 and 731-TA-1421 (Review), USITC Pub. 5596 (March 2025) at I-15.

⁷ Explanation of Commission Determination on Adequacy, EDIS Doc. 836326 (Nov. 4, 2024) ("Commission Adequacy Determination").

⁸ Commission Adequacy Determination at 1.

⁹ Petitioner's Final Comments in the Five-Year Review, EDIS Doc. Nos. 843446 (confidential version) & 843447 (public version) (Feb. 13, 2025) ("Dexstar's Final Comments").

¹⁰ CR/PR at I-11. The evidence available on the record indicates that Dexstar is the only currently operating producer of steel trailer wheels, and accounts for approximately 100 percent of U.S. production in 2023. CR/PR at I-11, I-14, B-4, Tables I-4 & B-1; Dexstar's NOI Response at 1, 11-12. However, Dexstar identified two additional U.S. firms that have the ability to produce steel trailer wheels: (1) The Carlstar Group LLC ("Carlstar"), and (2) American Wheel Corp. ("American Wheel"). *Id.* at I-11; Dexstar's Response to NOI at 10. The evidence available on the record indicates that both firms have ceased, or at least limited their production of steel trailer wheels. Dexstar's Response to NOI at 10.

statistics.¹¹ Foreign industry data and related information are based on information from the original investigations, information submitted by Dexstar in its response to the notice of institution, and publicly available information compiled by the Commission.¹² Additionally, two firms, ***, identified by Dexstar as U.S. purchasers of steel trailer wheels, responded to the Commission's adequacy phase questionnaire.¹³

II. Domestic Like Product and Industry

A. Domestic Like Product

In making its determination under section 751(c) of the Tariff Act, the Commission defines the "domestic like product" and the "industry."¹⁴ 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 under this subtitle."¹⁵ The Commission's practice in five-year reviews is to examine the domestic like product definition from the original investigation and consider whether the record indicates any reason to revisit the prior findings.¹⁶

Commerce has defined the imported merchandise within the scope of the orders under

¹¹ CR/PR at I-17 & Table I-6. Official import statistics are for HTS statistical reporting number 8716.90.5035, which contains both in-scope and out-of-scope merchandise. *Id.* at Table I-6; *see also id.* at I-6.

¹² *See* CR/PR at I-18, nn.33 & 34.

¹³ CR/PR at D-3.

¹⁴ 19 U.S.C. § 1677(4)(A).

¹⁵ 19 U.S.C. § 1677(10); *see, e.g., Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int'l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int'l Trade 1996); *Torrington Co. v. United States*, 747 F. Supp. 744, 748-49 (Ct. Int'l Trade 1990), *aff'd*, 938 F.2d 1278 (Fed. Cir. 1991); *see also* S. Rep. No. 249, 96th Cong., 1st Sess. 90-91 (1979).

¹⁶ *See, e.g., Internal Combustion Industrial Forklift Trucks from Japan*, Inv. No. 731-TA-377 (Second Review), USITC Pub. 3831 at 8-9 (Dec. 2005); *Crawfish Tail Meat from China*, Inv. No. 731-TA-752 (Review), USITC Pub. 3614 at 4 (July 2003); *Steel Concrete Reinforcing Bar from Turkey*, Inv. No. 731-TA-745 (Review), USITC Pub. 3577 at 4 (Feb. 2003).

review as follows:

The scope of the *Order* covers certain on-the-road steel wheels, discs, and rims for tubeless tires with a nominal wheel diameter of 12 inches to 16.5 inches, regardless of width. Certain on-the road steel wheels with a nominal wheel diameter of 12 inches to 16.5 inches within the scope are generally for road and highway trailers and other towable equipment, including, inter alia, utility trailers, cargo trailers, horse trailers, boat trailers, recreational trailers, and towable mobile homes. The standard widths of certain on-the-road steel wheels are 4 inches, 4.5 inches, 5 inches, 5.5 inches, 6 inches, and 6.5 inches, but all certain on-the road steel wheels, regardless of width, are covered by the scope.

The scope includes rims and discs for certain on-the-road steel wheels, whether imported as an assembly, unassembled, or separately. The scope includes certain on-the-road steel wheels regardless of steel composition, whether clad or not clad, whether finished or not finished, and whether coated or uncoated. The scope also includes certain on-the-road steel wheels with discs in either a “hub-piloted” or “stud-piloted” mounting configuration, though the stud-piloted configuration is most common in the size range covered. All on-the-road wheels sold in the United States must meet Standard 110 or 120 of the National Highway Traffic Safety Administration's (NHTSA) Federal Motor Vehicle Safety Standards, which requires a rim marking, such as the “DOT” symbol, indicating compliance with applicable motor vehicle standards. See 49 CFR 571.110 and 571.120. The scope includes certain on-the-road steel wheels imported with or without NHTSA's required markings.

Certain on-the-road steel wheels imported as an assembly with a tire mounted on the wheel and/or with a valve stem or rims imported as an assembly with a tire mounted on the rim and/or with a valve stem are included in the scope of these orders. However, if the steel wheels or rims are imported as an assembly with a tire mounted on the wheel or rim and/or with a valve stem attached, the tire and/or valve stem is not covered by the scope.

The scope includes rims, discs, and wheels that have been further processed in a third country, including, but not limited to, the painting of wheels from China and the welding and painting of rims and discs from China to form a steel wheel, or any other processing that would not otherwise remove the merchandise from the scope of the orders if performed in China.

Excluded from this scope are the following: (1) Steel wheels for use with tube-type tires; such tires use multi piece rims, which are two-piece and

three-piece assemblies and require the use of an inner tube; (2) aluminum wheels; (3) certain on-the-road steel wheels that are coated entirely in chrome. This exclusion is limited to chrome wheels coated entirely in chrome and produced through a chromium electroplating process, and does not extend to wheels that have been finished with other processes, including, but not limited to, Physical Vapor Deposition (PVD); (4) steel wheels that do not meet Standard 110 or 120 of the NHTSA's requirements other than the rim marking requirements found in 49 CFR 571.110S4.4.2 and 571.120S5.2; (5) steel wheels that meet the following specifications: steel wheels with a nominal wheel diameter ranging from 15 inches to 16.5 inches, with a rim width of 8 inches or greater, and a wheel backspacing ranging from 3.75 inches to 5.5 inches; and (6) steel wheels with wire spokes.

Certain on-the-road steel wheels subject to these orders are properly classifiable under the following category of the Harmonized Tariff Schedule of the United States (HTSUS): 8716.90.5035 which covers the exact product covered by the scope whether entered as an assembled wheel or in components. Certain on-the-road steel wheels entered with a tire mounted on them may be entered under HTSUS 8716.90.5059 (Trailers and semi-trailers; other vehicles, not mechanically propelled, parts, wheels, other, wheels with other tires) (a category that will be broader than what is covered by the scope). While the HTSUS subheadings are provided for convenience and customs purposes, the written description of the subject merchandise is dispositive.¹⁷

Steel trailer wheels consist of certain on-road steel wheels, discs, and rims for tubeless tires, with a nominal rim diameter of 12 to 16.5 inches regardless of width, for use in road and highway trailers and other towable equipment.¹⁸ When imported, these trailer wheels may or may not have tires mounted on the wheel or rim and may or may not be attached to a valve

¹⁷ *Certain Steel Wheels 12 to 16.5 Inches in Diameter From the People's Republic of China: Final Results of the Expedited First Sunset Review of the Countervailing Duty Order*, 89 Fed. Reg. 95174 (Dec. 2, 2024) (“*Commerce’s Final Results First Review CVD Order*”) and accompanying Issues and Decision Memorandum (Nov. 25, 2024) (“*IDM (CVD)*”) at 2-3; *Certain Steel Wheels 12 to 16.5 Inches in Diameter From the People's Republic of China: Final Results of the Expedited First Sunset Review of the Antidumping Duty Order*, 89 Fed. Reg. 95179 (Dec. 2, 2024) (“*Commerce’s Final Results First Review AD Order*”) and accompanying IDM (“*IDM (AD)*”) (Nov. 25, 2024) at 2-3.

¹⁸ CR/PR at I-7.

stem.¹⁹ Within the U.S. market, trailer wheels are sold to either the assembly/original equipment manufacturing (“OEM”) market or to the aftermarket.²⁰ Steel trailer wheels are used for a variety of trailers, including utility trailers, cargo trailers, horse trailers, boat trailers, and towable recreational trailers (“towable RVs”), as well as mobile homes (“manufactured homes”).²¹

In its original determinations, the Commission defined a single domestic like product consisting of all steel trailer wheels, coextensive with Commerce’s scope.^{22 23}

In the current reviews, the record does not contain any new information suggesting

¹⁹ CR/PR at I-7.

²⁰ CR/PR at I-7. During the original investigations, industry representatives reported that approximately 70 percent of steel trailer wheels were sold to the assembly/OEM market, while the remaining 30 percent were sold to the aftermarket. *Id.*

²¹ CR/PR at I-7. Manufactured homes use in-scope rims without a disc and are sold to manufactured home OEMs, which attach the rim directly to specialized hubs using axle mounting bolts. Subject trailer wheels are built to carry loads two-and-a-half to three times heavier than passenger vehicles. *Id.*

²² Confidential Views Original Determination, at 17, EDIS Doc. 833981 (Aug. 22, 2019) (“Conf. Original Inv. Views”); *Original Determination*, USITC Pub. 4943 at 13; *see also* CR/PR at I-15. In the original investigations the Commission applied its semi-finished product analysis to determine that rims for towable mobile homes were appropriately included in the same domestic like product as wheels that include both rims and discs. Conf. Original Inv. Views at 10-11; *Original Determination*, USITC Pub. 4943 at 9. It observed that the vast majority of rims are dedicated to production of steel trailer wheels with the essential physical characteristics and functions the same regardless of end use. The Commission found that “the process used to transform rims into whole steel trailer wheels, while adding substantial value to the product, takes place at the same production facility, uses some common processes, and largely involves the additional step of welding a disc to the rim.” Conf. Original Inv. Views at 11; *Original Determination*, USITC Pub. 4943 at 9.

²³ The Commission also found that galvanized and non-galvanized steel trailer wheels should be defined as a single domestic like product. Conf. Original Inv. Views at 16; *Original Determination*, USITC Pub. 4943 at 12-13. It found that the physical characteristics and uses of galvanized and non-galvanized steel trailer wheels were essentially the same. Conf. Original Inv. Views at 16; *Original Determination*, USITC Pub. 4943 at 12. The Commission observed that the manufacturing facilities, production process, and employees were also the same, except with respect to the finishing process, which had a relatively low cost as compared to the price of the trailer wheel. Galvanized and non-galvanized trailer wheels were largely interchangeable, were perceived as the same product with different coatings, and were sold through similar channels of distribution. The Commission noted some differences in market participants’ views regarding the comparability of non-galvanized and galvanized trailer wheels and some differences in prices, but found that on balance, the record did not indicate a clear dividing line between the two. Conf. Original Inv. Views at 16; *Original Determination*, USITC Pub. 4943 at 13.

that the pertinent characteristics and uses of steel trailer wheels have changed since the original investigations so as to warrant revisiting the Commission's domestic like product definition.²⁴ Dexstar agrees with the Commission's definition of the domestic like product from the original investigations.²⁵ Consequently, we again define a single domestic like product consisting of all steel trailer wheels, coextensive with the scope of the reviews.

B. Domestic Industry

Section 771(4)(A) of the Tariff Act defines the relevant industry 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."²⁶ 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.

In the original investigations the Commission examined two domestic industry issues:²⁷ (1) whether U.S. galvanizer and toll producer *** was engaged in sufficient production-related activities to be included in the domestic industry;²⁸ and (2) whether appropriate circumstances existed to exclude any domestic producers from the domestic industry pursuant to the related

²⁴ CR/PR at I-15.

²⁵ Dexstar's NOI Response at 33. In the current reviews no party has requested the Commission to either: (1) apply a semi-finished analysis, or (2) find more than one domestic like product, *i.e.*, galvanized versus non-galvanized steel trailer wheels. *See, e.g., id.*

²⁶ 19 U.S.C. § 1677(4)(A). The definitions in 19 U.S.C. § 1677 are applicable to the entire subtitle containing the antidumping and countervailing duty laws, including 19 U.S.C. §§ 1675 and 1675a. *See* 19 U.S.C. § 1677.

²⁷ Conf. Original Inv. Views at 17; *Original Determination*, USITC Pub. 4943 at 13.

²⁸ Conf. Original Inv. Views at 17; *Original Determination*, USITC Pub. 4943 at 13.

parties provision.²⁹

In the original investigations the Commission: (1) found that U.S. galvanizer *** did not engage in sufficient domestic production-related activities to constitute domestic production,³⁰ (2) excluded U.S. producer Carlstar but not Petitioner Dexstar pursuant to the related parties provision, and (3) therefore defined the domestic industry to include all U.S. producers of steel trailer wheels, except Carlstar.³¹

1. Sufficient Production-Related Activities

In deciding whether a firm qualifies as a domestic producer of the domestic like product, the Commission generally analyzes the overall nature of a firm's U.S. production-related activities, although production-related activity at minimum levels could be insufficient to constitute domestic production.³²

a. Original Investigations

The Commission observed that Dexstar contracted with *** to galvanize a portion of Dexstar's steel trailer wheels and then return the galvanized wheel back to Dexstar for sale.³³ It observed that there was some technical expertise involved in galvanizing steel trailer wheels.

²⁹ Conf. Original Inv. Views at 17; *Original Determination*, USITC Pub. 4943 at 13.

³⁰ Conf. Original Inv. Views at 19; *Original Determination*, USITC Pub. 4943 at 14.

³¹ Conf. Original Inv. Views at 23; *Original Determination*, USITC Pub. 4943 at 17.

³² The Commission generally considers six factors in determining whether a firm is engaged in sufficient production-related activities to be considered part of the domestic industry: (1) source and extent of the firm's capital investment; (2) technical expertise involved in U.S. production activities; (3) value added to the product in the United States; (4) employment levels; (5) quantity and type of parts sourced in the United States; and (6) any other costs and activities in the United States directly leading to production of the like product. No single factor is determinative and the Commission may consider any other factors it deems relevant in light of the specific facts of any investigation. *Crystalline Silica Photovoltaic Cells and Modules from China*, Inv. Nos. 701-TA-481 and 731-TA-1190 (Final), USITC Pub. 4360 at 12-13 (Nov. 2012).

³³ Conf. Original Inv. Views at 18; *Original Determination*, USITC Pub. 4943 at 14.

However, *** reported no capital investments or additional costs or activities. Further, the Commission noted that *** had few employees compared to U.S. producers,³⁴ and had a low value added compared to the average unit value (“AUV”) of Petitioner’s shipments of galvanized wheels.³⁵ The Commission accordingly found that *** did not appear to engage in sufficient domestic production-related activities to be included in the domestic industry.³⁶

b. Current Reviews

There is limited new information on the record in these reviews with respect to Dexstar’s tolling arrangements.³⁷ Dexstar has provided no indication that the terms of its arrangement with *** to have the firm galvanize its wheels and return them back to Dexstar for sale have changed since the original period of investigation, and it does not request inclusion of *** in the domestic industry. We accordingly find that the information available on the record indicates that *** does not appear to engage in sufficient domestic production activities to be included in the domestic industry.

2. Related Parties

We must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Tariff Act.³⁸ This provision allows the Commission, if appropriate circumstances exist, to exclude from the

³⁴ Conf. Original Inv. Views at 19; *Original Determination*, USITC Pub. 4943 at 14.

³⁵ Conf. Original Inv. Views at 19; *Original Determination*, USITC Pub. 4943 at 14. Specifically, *** average value added was \$*** per pound in January to March 2019 (“interim 2019”) as opposed to the \$*** per pound AUV for the domestic like product in the same period. *Id.*; see also Conf. Inv. Staff Report at III-6 n. 5 (estimates of *** “value added”), Table F-1 (AUVs for the domestic like product).

³⁶ See Conf. Original Inv. Views at 19; *Original Determination*, USITC Pub. 4943 at 14.

³⁷ See CR/PR at I-10 (manufacturing process).

³⁸ See 19 U.S.C. § 1677(4)(B).

domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.³⁹ Exclusion of such a producer is within the Commission’s discretion based upon the facts presented in each investigation.⁴⁰

a. Original Investigations

The Commission found that U.S. producers Dexstar and Carlstar each qualified for treatment as a related party because they imported subject merchandise from China during the period of investigation (“POI”).⁴¹ The Commission found for the reasons discussed below that appropriate circumstances did not exist to exclude Dexstar from the domestic industry, but did exist to exclude Carlstar.⁴²

Dexstar: The Commission found that Dexstar was a related party because it imported

³⁹ 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).

⁴⁰ 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), *aff’d*, 879 F.3d 1377 (Fed. Cir. 2018); see also *Torrington Co. v. United States*, 790 F. Supp. at 1168.

⁴¹ Conf. Original Inv. Views at 20; *Original Determination*, USITC Pub. 4943 at 15.

⁴² Conf. Original Inv. Views at 20; *Original Determination*, USITC Pub. 4943 at 15. Dexstar argued that both firms should be included in the domestic industry. *Id.* Respondent Trans Texas Tire, LLC (“TTT”) agreed that Dexstar should not be excluded from the domestic industry as a related party. See *id.*

subject merchandise during the POI.^{43 44} Dexstar asserted that its imports of subject merchandise enabled it to compete in the U.S. market.⁴⁵

The Commission found that Dexstar's principal interest appeared to lie in domestic production rather than importation.⁴⁶ It observed that Dexstar accounted for the vast majority of domestic production, was the petitioner, and produced far more in the United States than it imported in every year of the POI.⁴⁷ The Commission also noted that no party argued that Dexstar should be excluded from the domestic industry.⁴⁸ Consequently, the Commission found that appropriate circumstances did not exist to exclude Dexstar from the domestic industry.⁴⁹

Carlstar: The Commission found that Carlstar, which had relatively low levels of production and *** the petition, qualified for treatment as a related party because it imported subject merchandise during the POI.⁵⁰ Carlstar asserted that it imported subject merchandise

⁴³ Conf. Original Inv. Views at 20-21; *Original Determination*, USITC Pub. 4943 at 15. The Commission found that Dexstar was also arguably a related party because it is a division of a third party, (ADI) that had three other divisions that imported subject merchandise. Conf. Original Inv. Views at 21 n.79; *Original Determination*, USITC Pub. 4943 at 15 n.79.

⁴⁴ Conf. Original Inv. Views at 21; *Original Determination*, USITC Pub. 4943 at 15. Dexstar imported *** pounds of subject merchandise in interim 2018 and *** pounds in interim 2019, equivalent to *** and *** percent, respectively, of its domestic production. *Id.* Further, Dexstar and the three other ADI divisions that imported subject merchandise taken together imported *** pounds in 2016 *** pounds in 2017, and *** pounds in 2018, the equivalent of ***, ***, and *** percent, respectively, of Dexstar's domestic production in those years. They imported *** pounds of subject merchandise in interim 2018 and *** pounds in interim 2019, the equivalent of *** and *** percent, respectively, of Dexstar's domestic production in those years. *Id.*

⁴⁵ Conf. Original Inv. Views at 21; *Original Determination*, USITC Pub. 4943 at 16. Dexstar asserted that it imported subject merchandise because *** *Id.* (bracketed material added).

⁴⁶ Conf. Original Inv. Views at 22; *Original Determination*, USITC Pub. 4943 at 16.

⁴⁷ Conf. Original Inv. Views at 22; *Original Determination*, USITC Pub. 4943 at 16.

⁴⁸ Conf. Original Inv. Views at 22; *Original Determination*, USITC Pub. 4943 at 16.

⁴⁹ Conf. Original Inv. Views at 22; *Original Determination*, USITC Pub. 4943 at 16.

⁵⁰ Conf. Original Inv. Views at 22; *Original Determination*, USITC Pub. 4943 at 16. It further noted that Carlstar imported *** pounds of subject merchandise in 2016, *** pounds in 2017, and *** pounds in 2018, the equivalent of *** percent, *** percent, and *** percent, respectively, of its domestic production in those years. *Id.*

during the POI because of ***.⁵¹

The Commission found that Carlstar's principal interest appeared to lie increasingly in importation rather than domestic production, as it imported a growing volume of steel trailer wheels from China during the POI and its domestic production declined to low levels.⁵² Consequently, the Commission concluded that appropriate circumstances existed to exclude Carlstar from the domestic industry.^{53 54}

American Wheel: The Commission noted that American Wheel was one of three known domestic producers of steel trailer wheels,⁵⁵ but found that the related parties issue was moot because American Wheel did not submit a U.S. producers' questionnaire response.⁵⁶

Consequently, the Commission defined the domestic industry to include all U.S. producers of steel trailer wheels, except Carlstar.⁵⁷

b. Current Reviews

Neither Dexstar nor any other party requested that any U.S. producer be excluded from

⁵¹ Conf. Original Inv. Views at 22; *Original Determination*, USITC Pub. 4943 at 16.

⁵² Conf. Original Inv. Views at 23; *Original Determination*, USITC Pub. 4943 at 16.

⁵³ Conf. Original Inv. Views at 23; *Original Determination*, USITC Pub. 4943 at 17.

⁵⁴ Commissioner Kearns did not find that appropriate circumstances existed to exclude Carlstar from the domestic industry. Conf. Original Inv. Views at 23 n.90; *Original Determination*, USITC Pub. 4943 at 16 n.90. He considered that Carlstar's interests had not completely shifted to importation, and that excluding Carlstar from the industry would skew the data by masking some of the domestic industry's loss of production, shipments, and market share over the POI. While Commissioner Kearns therefore analyzed injury to a differently defined domestic industry, he found that the trends in the data he considered did not differ significantly from what the majority considered (due in large part to Carlstar's small size). Therefore, he joined the majority's views. *Id.*

⁵⁵ Conf. Original Inv. Views at 17; *Original Determination*, USITC Pub. 4943 at 13.

⁵⁶ See Conf. Original Inv. Views at 17; *Original Determination*, USITC Pub. 4943 at 13.

⁵⁷ Conf. Original Inv. Views at 23; *Original Determination*, USITC Pub. 4943 at 17.

the domestic industry pursuant to the related parties provision.⁵⁸ For the reasons set forth below, we define the domestic industry to include all U.S. producers of steel trailer wheels.

Dexstar: Dexstar asserts that, in contrast to the original investigations, it did not import steel trailer wheels from China during the POR,⁵⁹ and the limited information on the record contains no indication that Dexstar or its affiliates imported subject merchandise during the reviews.⁶⁰ Dexstar also reports that it is related to a producer of the subject merchandise in China, Zhejiang Starco Huanmei Auto-Parts Co. Ltd. (“Starco Huanmei”). Starco Huanmei is ***.⁶¹ In turn, ***.⁶² Dexstar Wheel, ***.⁶³ Dexstar asserts that Starco Huanmei ***, and there is no information on the record contrary to this assertion.⁶⁴ Therefore, it appears that Dexstar did not import subject merchandise and is not related to an exporter of subject merchandise to the United States. The record contains no other information indicating that Dexstar qualifies for exclusion as a related party.

In any event, based on the limited information on the record, we find that excluding Dexstar from the domestic industry would skew the data for the domestic industry. As noted,

⁵⁸ Dexstar’s NOI Response at 33; Conf. Original Inv. Views at 23; *Original Determination*, USITC Pub. 4943 at 17.

⁵⁹ Dexstar’s Response to NOI at 31. According to Dexstar, “{n}either Petitioner {Dexstar} nor any of its U.S. affiliates is currently an importer of the subject merchandise from China.” *Id.* (bracketed material added). We note that there no information in the current reviews that calls Dexstar’s assertion into question. See CR/PR at I-15; see also Dexstar’s Response to NOI at 31, Exh. 1 (U.S. importers).

⁶⁰ Neither Dexstar nor its affiliates are listed as U.S. importers of steel trailer wheels from China during the POR. See Dexstar’s Response to NOI at Exh. 1 (listing known U.S. importers).

⁶¹ Dexstar’s Response to NOI at 31.

⁶² Dexstar’s Response to NOI at 31.

⁶³ Dexstar’s Response to NOI at 31.

⁶⁴ Dexstar’s Response to NOI at 31 and Exh. 1 (Starco Huanmei is not listed as a potential foreign producer or exporter).

Dexstar accounted for nearly all of the domestic production of steel trailer wheels.⁶⁵ Thus, excluding Dexstar would result in the lack of a domestic industry during the review period. Further, no party in these reviews has argued that Dexstar should be excluded from the domestic industry.⁶⁶ In light of these considerations, we conclude that appropriate circumstances do not exist to exclude Dexstar from the domestic industry pursuant to the related parties provision.⁶⁷

Carlstar: In the original investigations Carlstar was excluded from the domestic industry pursuant to the related parties provision.⁶⁸ Carlstar continued to import steel trailer wheels from China during the POR;⁶⁹ however, based on the limited information on the record, it appears that Carlstar did not produce steel trailer wheels in the United States during the POR.⁷⁰ Therefore, Carlstar does not qualify as a domestic producer and is not included in the definition of the

⁶⁵ CR/PR at I-1, I-11 (Dexstar indicated “that it accounted for 100 percent of production of trailer wheels in the United States during 2023.”); Dexstar’s Response to NOI at 31.

⁶⁶ Dexstar’s Response to NOI at 31; *see also* CR/PR at I-11—I-13.

⁶⁷ Based on his reading of the statute, Commissioner Kearns believes the Commission has the authority to find a domestic producer to be a related party in an administrative review if the producer was deemed a related party in the original investigation or if there is evidence that, absent the order, there would be imports or purchases of subject merchandise by this producer or exports by affiliated foreign producers. In any event, Commissioner Kearns agrees that appropriate circumstances do not exist to exclude Dexstar from the domestic industry in these reviews. Not only did Dexstar account for nearly all domestic production in 2023, there is no evidence on the record that Dexstar was shielded from subject import competition or that its operations otherwise benefited from subject imports, and no party has argued for its exclusion.

⁶⁸ *See, e.g.*, CR/PR at I-12—I-13; Dexstar’s Response to NOI at 10-12, 31. *Steel Trailer Wheels from China; Institution of Five-Year Review*, 89 Fed. Reg. 62783, 62784 (Aug. 1, 2024), EDIS Doc. 827995 (“In its original determinations, the Commission defined the *Domestic Industry* to include all U.S. producers of steel trailer wheels, except the Carlstar Group LLC.”). Dexstar agrees with the Commission’s definition of the domestic industry from the original investigations. Dexstar’s NOI Response at 33.

⁶⁹ *See* Dexstar’s Response to NOI at 32; *Original Determination*, USITC Pub. 4943 at 23. As noted, Carlstar, which was a small producer at the time of the original investigations, was excluded as a related party. *Id.*; *see also* discussion above. Moreover, based on the limited information on the record, Carlstar does not appear to have produced steel trailer wheels, or produced only very limited quantities, in the United States during the POR. CR/PR at I-12, Table I-3; Dexstar’s Response to NOI at 31.

⁷⁰ CR/PR at I-12, Table I-3 (“Carlstar is believed to have ceased U.S. production of steel trailer wheels. The steel trailer wheels in their 2023 catalog do not indicate that they are made in the USA, as other products in the catalog do.”); Dexstar’s Response to NOI at 10 & Exh. 10.

domestic industry for purposes of these reviews.

American Wheel, Saylor Wheel and Indiana Wheel Company (“IWC”): Dexstar also identified American Wheel, Saylor Wheel, and IWC as possible U.S. producers of steel trailer wheels that would be potentially subject to the related parties provision.⁷¹ However, the information on the record indicates that American Wheel ceased operations near the time the AD/CVD orders were imposed (Sept. 2019) and does not appear to have restarted production during the POR.⁷² The information on the record also indicates that Saylor Wheel is a potential new entrant to the domestic industry, but has not commenced production of steel trailer wheels during the POR.⁷³ Finally, IWC, a joint venture involving Chinese producer Zhejiang Jingu Company Limited (“Jingu”), announced it plans to establish a plant in Plymouth, Indiana in 2019.⁷⁴ However, IWC does not appear to have commenced production during the POR.⁷⁵ Therefore, American Wheel, Saylor Wheel, and IWC do not appear to have produced the domestic like product during the POR. Consequently, we do not need to determine whether American Wheel, Saylor Wheel, or IWC should be excluded from the domestic industry pursuant to the related parties provision.

Accordingly, we define the domestic industry to be all domestic producers of steel trailer wheels, consistent with our definition of the domestic like product.

⁷¹ See, e.g., CR/PR at I-12—I-13; Dexstar’s Response to NOI at 10-12, 31.

⁷² CR/PR at I-12, Table I-3; Dexstar’s Response to NOI at 10 & Exh. 8.

⁷³ CR/PR at I-14, Table I-3 (“As of October 2024, Saylor will reportedly launch its U.S. manufacturing operations by the end of the fourth quarter 2024.”); Dexstar’s Response to NOI at 31.

⁷⁴ CR/PR at Appendix D (U.S. purchasers questionnaire responses) at D-3 (U.S. purchaser ***).

⁷⁵ CR/PR at I-14, Table I-3 ***; Dexstar’s Response to NOI at 31. Dexstar believes that Indiana Wheel either did not produce steel trailer wheels during the review period or produced very limited quantities. See Dexstar’s Response to NOI at 31.

III. Revocation of the Antidumping and Countervailing Duty Orders Would Likely Lead to Continuation or Recurrence of Material Injury Within a Reasonably Foreseeable Time

A. Legal Standards

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order “would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.”⁷⁶ The SAA states that “under the likelihood standard, the Commission will engage in a counterfactual analysis; it must decide the likely impact in the reasonably foreseeable future of an important change in the status quo – the revocation or termination of a proceeding and the elimination of its restraining effects on volumes and prices of imports.”⁷⁷ Thus, the likelihood standard is prospective in nature.⁷⁸ The U.S. Court of International Trade has found that “likely,” as used in the five-year review provisions of the Act, means “probable,” and the Commission applies that standard in five-year reviews.⁷⁹

⁷⁶ 19 U.S.C. § 1675a(a).

⁷⁷ SAA, H.R. Rep. No. 103-316 vol. I at 883-84. The SAA states that “{t}he likelihood of injury standard applies regardless of the nature of the Commission’s original determination (material injury, threat of material injury, or material retardation of an industry). Likewise, the standard applies to suspended investigations that were never completed.” *Id.* at 883.

⁷⁸ While the SAA states that “a separate determination regarding current material injury is not necessary,” it indicates that “the Commission may consider relevant factors such as current and likely continued depressed shipment levels and current and likely continued {sic} prices for the domestic like product in the U.S. market in making its determination of the likelihood of continuation or recurrence of material injury if the order is revoked.” SAA at 884.

⁷⁹ See *NMB Singapore Ltd. v. United States*, 288 F. Supp. 2d 1306, 1352 (Ct. Int’l Trade 2003) (“‘likely’ means probable within the context of 19 U.S.C. § 1675(c) and 19 U.S.C. § 1675a(a)”), *aff’d mem.*, (Continued ...)

The statute states that “the Commission shall consider that the effects of revocation or termination may not be imminent, but may manifest themselves only over a longer period of time.”⁸⁰ According to the SAA, a “‘reasonably foreseeable time’ will vary from case-to-case, but normally will exceed the ‘imminent’ timeframe applicable in a threat of injury analysis in original investigations.”⁸¹

Although the standard in a five-year review is not the same as the standard applied in an original investigation, it contains some of the same fundamental elements. The statute provides that the Commission is to “consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the orders are revoked or the suspended investigation is terminated.”⁸² It directs the Commission to take into account its prior injury determination, whether any improvement in the state of the industry is related to the order or the suspension agreement under review, whether the industry is vulnerable to material injury if an order is revoked or a suspension agreement is terminated, and any findings by Commerce regarding duty absorption pursuant to 19 U.S.C. § 1675(a)(4).⁸³ The statute further provides that the presence or

140 Fed. Appx. 268 (Fed. Cir. 2005); *Nippon Steel Corp. v. United States*, 26 CIT 1416, 1419 (2002) (same); *Usinor Industeel, S.A. v. United States*, 26 CIT 1402, 1404 nn.3, 6 (2002) (“more likely than not” standard is “consistent with the court’s opinion;” “the court has not interpreted ‘likely’ to imply any particular degree of ‘certainty’”); *Indorama Chemicals (Thailand) Ltd. v. United States*, 26 CIT 1059, 1070 (2002) (“standard is based on a likelihood of continuation or recurrence of injury, not a certainty”); *Usinor v. United States*, 26 CIT 767, 794 (2002) (“‘likely’ is tantamount to ‘probable,’ not merely ‘possible’”).

⁸⁰ 19 U.S.C. § 1675a(a)(5).

⁸¹ SAA at 887. Among the factors that the Commission should consider in this regard are “the fungibility or differentiation within the product in question, the level of substitutability between the imported and domestic products, the channels of distribution used, the methods of contracting (such as spot sales or long-term contracts), and lead times for delivery of goods, as well as other factors that may only manifest themselves in the longer term, such as planned investment and the shifting of production facilities.” *Id.*

⁸² 19 U.S.C. § 1675a(a)(1).

⁸³ 19 U.S.C. § 1675a(a)(1). Commerce has not made any duty absorption findings. See *Common Alloy Aluminum Sheet from the People’s Republic of China: Final Results of the Expedited First Sunset* (Continued ...)

absence of any factor that the Commission is required to consider shall not necessarily give decisive guidance with respect to the Commission's determination.⁸⁴

In evaluating the likely volume of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether the likely volume of imports would be significant either in absolute terms or relative to production or consumption in the United States.⁸⁵ In doing so, the Commission must consider "all relevant economic factors," including four enumerated factors: (1) any likely increase in production capacity or existing unused production capacity in the exporting country; (2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) 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.⁸⁶

In evaluating the likely price effects of subject imports if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether there is likely to be significant underselling by the subject imports as compared to the domestic like product and whether the subject imports are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic

Review of the Antidumping Duty Order, 89 Fed. Reg. 38096 (May 7, 2024).

⁸⁴ 19 U.S.C. § 1675a(a)(5). Although the Commission must consider all factors, no one factor is necessarily dispositive. SAA at 886.

⁸⁵ 19 U.S.C. § 1675a(a)(2).

⁸⁶ 19 U.S.C. § 1675a(a)(2)(A-D).

like product.⁸⁷

In evaluating the likely impact of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider all relevant economic factors that are likely to have a bearing on the state of the industry in the United States, including but not limited to the following: (1) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity; (2) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment; and (3) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.⁸⁸ All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to which any improvement in the state of the domestic industry is related to the order under review and whether the industry is vulnerable to material injury upon revocation.⁸⁹

No respondent interested party participated in these expedited reviews. The record, therefore, contains limited new information with respect to the steel trailer wheel industry in

⁸⁷ See 19 U.S.C. § 1675a(a)(3). The SAA states that “[c]onsistent with its practice in investigations, in considering the likely price effects of imports in the event of revocation and termination, the Commission may rely on circumstantial, as well as direct, evidence of the adverse effects of unfairly traded imports on domestic prices.” SAA at 886.

⁸⁸ 19 U.S.C. § 1675a(a)(4).

⁸⁹ The SAA states that in assessing whether the domestic industry is vulnerable to injury if the order is revoked, the Commission “considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they may also demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.” SAA at 885.

China. There is also limited information on the steel trailer wheel market in the United States during the POR. Accordingly, for our determinations, we rely as appropriate on the facts available from the original investigations, and the limited new information on the record in these reviews.

B. Conditions of Competition and the Business Cycle

In evaluating the likely impact of the subject imports on the domestic industry if an order is revoked, the statute directs the Commission to consider all relevant economic factors “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”⁹⁰ The following conditions of competition inform our determination.

1. Captive Production

Original Investigations. The Commission found that Dexstar internally transferred a significant portion of its steel trailer wheel output to affiliated ADI divisions for the production of tire/wheel assemblies.⁹¹ However, it found that the captive production provision⁹² did not apply because tires, and not steel wheels, represent the predominant raw material cost of the

⁹⁰ 19 U.S.C. § 1675a(a)(4).

⁹¹ Conf. Original Inv. Views at 29; Original Determination, USITC Pub. 4943 at 21.

⁹² The captive production provision, 19 U.S.C. § 1677(7)(C)(iv), as amended by the Trade Preferences Extension Act of 2015, provides:

(iv) CAPTIVE PRODUCTION – If domestic producers internally transfer significant production of the domestic like product for the production of a downstream article and sell significant production of the domestic like product in the merchant market, and the Commission finds that-

- (I) the domestic like product produced that is internally transferred for processing into that downstream article does not enter the merchant market for the domestic like product, and
- (II) the domestic like product is the predominant material input in the production of that downstream article.

The SAA indicates that where a domestic like product is transferred internally for the production of another article coming within the definition of the domestic like product, such transfers do not constitute internal transfers for the production of a “downstream article” for purposes of the captive production provision. SAA at 853.

downstream product.⁹³ The Commission nevertheless concluded that Dexstar's transfers to its affiliates were a pertinent condition of competition in the investigations.⁹⁴

*Current Reviews.*⁹⁵ We again find that Dexstar's transfers to its affiliates are a pertinent condition of competition,⁹⁶ and no party has argued for a different outcome in these reviews.⁹⁷ The record in these reviews contains no indication that the facts regarding Dexstar's provision of subject merchandise to its affiliates have changed significantly.⁹⁸

2. Demand Conditions

Original Investigations. The Commission observed in the original investigations that steel trailer wheels are sold in the assembly/OEM market and the aftermarket.⁹⁹ In the assembly/OEM market, U.S. demand for trailer wheels was driven mainly by demand for new U.S.-produced

⁹³ Steel trailer wheels accounted for about *** of the cost of a tire-wheel assembly. *Original Determination*, Conf. Original Inv. Views at 30; *Original Determination*, USITC Pub. 4943 at 21.

⁹⁴ Conf. Original Inv. Views at 30; *Original Determination*, USITC Pub. 4943 at 22.

⁹⁵ The Commission has stated that the statutory captive provision generally does not apply to five-year reviews. *See, e.g., Polyethylene Terephthalate Film, Sheet and Strip from India and Taiwan*, Inv. Nos. 701-TA-415 (Review) and 731-TA-933-934 (Review), USITC Pub. 3994 at 18, n. 123 (April 2008); *Certain Hot-Rolled Flat-Rolled Carbon-Quality Steel Products from Brazil, Japan, and Russia*, Inv. Nos. 701-TA-384 and 731-TA-806-808 (Review), USITC Pub. 3767 at 29 n.165 (April 2005); *Stainless Steel Wire Rod from Italy, Japan, Korea, Spain, Sweden, and Taiwan*, Inv. Nos. 731-TA-770-775 (Review), USITC Pub. 3707 at 20 n.143 (July 2004). However, if the Commission finds that the subject imports are not likely to affect open-market and captive production the same way, the Commission may, as it often did in pre-URAA investigations, focus its evaluation on the open-market segment of the industry, as well as on effects on overall production and production for captive consumption. *See, e.g., Certain Carbon Steel Products, supra; Sebacic Acid from China*, Inv. No. 731-TA-653 (Review), USITC Pub. 3189 at 7 n.26 (May 1999).

⁹⁶ *See* Conf. Original Inv. Views at 30; *Original Determination*, USITC Pub. 4943 at 22.

⁹⁷ *See* Dexstar's Response to NOI at Exh. 1, page 10 (data for commercial shipments and internal transfers).

⁹⁸ Dexstar's Response to NOI at Exh. 1, page 10. Dexstar reports that its total commercial shipments were *** pounds, and its total "internal consumption or transfers to related firms" ("IC/TR") were *** pounds in 2023, *** percent of its total U.S. shipments of *** pounds. *Calculated from* Dexstar's Response to NOI at Exh. 1, page 10 (data for commercial shipments and internal transfers).

⁹⁹ Conf. Original Inv. Views at 30; *Original Determination*, USITC Pub. 4943 at 22.

towable RV trailers and other towable trailers.¹⁰⁰ In the aftermarket, demand was based on the replacement needs for trailer wheels.¹⁰¹ Apparent U.S. consumption increased in the total market, OEM/assemblers market, and aftermarket from 2016 to 2018, but was lower in interim 2019 compared to interim 2018.¹⁰² The Commission observed that most firms reported an increase in U.S. demand for trailer wheels since the beginning of the POI, *i.e.*, January 1, 2016.¹⁰³

Current Reviews. There is no new information on the record of these reviews indicating that the factors influencing demand have changed since the original investigations. The record indicates that demand for steel trailer wheels continues to be driven mainly by demand for new RV and other trailers, plus aftermarket demand for replacement wheels for those trailers.¹⁰⁴ Data from the RV Industry Association (“RVIA”) indicate that following a peak in 2021, overall RV shipments have fallen sharply, to levels below those in 2019.¹⁰⁵ These data appear to be a reliable proxy for trends in shipments of towable RVs, which were a relatively steady portion of total RV shipments during the POI and POR.¹⁰⁶ According to Dexstar, while some modest recovery is expected into 2025, there is not likely to be any surge in demand for steel trailer wheels in the U.S. market, or even a full return to levels of demand during the original POI.¹⁰⁷ Dexstar considers

¹⁰⁰ Conf. Original Inv. Views at 30-31; *Original Determination*, USITC Pub. 4943 at 22.

¹⁰¹ Conf. Original Inv. Views at 31; *Original Determination*, USITC Pub. 4943 at 22.

¹⁰² Conf. Original Inv. Views at 31; *Original Determination*, USITC Pub. 4943 at 22.

¹⁰³ Conf. Original Inv. Views at 31; *Original Determination*, USITC Pub. 4943 at 22-23.

¹⁰⁴ Dexstar’s NOI Response at 6; Dexstar’s Final Comments at 2; *see also* CR/PR at I-7 (“Within the U.S. market, trailer wheels are sold to either the assembly/original equipment manufacturing (“OEM”) market or to the aftermarket”).

¹⁰⁵ Dexstar’s NOI Response at 7. RVIA data indicate that shipments of RVs decreased substantially in 2022, and decreased further in 2023. RVIA, Historical RV Data at 2 (Dexstar’s NOI Response, Exh. 2).

¹⁰⁶ RVIA, Historical RV Data at 2 (Dexstar’s NOI Response, Exh. 2); RVIA data (Dexstar’s NOI Response, Exh. 3) (indicating that towable RVs represented between 80 and 90 percent of total RV shipments during the POR).

¹⁰⁷ Dexstar’s NOI Response at 7.

that the only moderate growth it foresees in the overall U.S. economy is not likely to accelerate demand for steel trailer wheels in the foreseeable future.¹⁰⁸

In 2023, apparent U.S. consumption of steel trailer wheels was *** million pounds tons, *** percent lower than the *** million pounds recorded in 2018, the last year of the POI.¹⁰⁹

3. Supply Conditions

Original Investigations. The domestic producers consisted of Dexstar, Carlstar, and American Wheel.¹¹⁰ Three other divisions of ADI – ATW, Monitor, and Martin – used steel wheels in their production of tire/wheel assemblies.

The domestic industry was the second largest source of supply in the market, accounting for *** percent of apparent U.S. consumption in the last full year of the POI (2018).¹¹¹ Subject imports from China were the largest individual source of import supply in the U.S. market during the POI, accounting for *** percent of apparent U.S. consumption in 2018.¹¹² Nonsubject imports were the smallest source of supply in the market, with a collective *** percent share of apparent

¹⁰⁸ Dexstar's NOI Response at 8.

¹⁰⁹ *Calculated from CR/PR* at Table I-6.

¹¹⁰ Conf. Original Inv. Views at 32; *Original Determination*, USITC Pub. 4943 at 23; *see also* Conf. Inv. Staff Report at 1-5. Dexstar accounted for *** of the U.S. production during the POI. *See id.* at I-5 n.9; Conf. Original Inv. Staff Report at 1-5 n.9.

¹¹¹ Conf. Original Inv. Views at 32; *Original Determination*, USITC Pub. 4943 at 23. The Commission also observed that the domestic industry was the second largest source of supply in the OEM/assemblers market and aftermarket, where its market shares also declined throughout the POI. *Id.* A majority of the domestic industry's U.S. commercial shipments went to OEMs/assemblers, with a smaller proportion to the aftermarket. *Id.* The domestic industry reported *** production capacity and substantial unused capacity throughout the POI. *Id.*

¹¹² Conf. Original Inv. Views at 33 *Original Determination*, USITC Pub. 4943 at 24. The Commission further noted that subject imports were the largest source of supply in the OEM/assemblers market and aftermarket, where their market shares also increased from 2016 to 2018, but were lower in interim 2019 than in interim 2018. *Id.* A large majority of U.S. importers' U.S. commercial shipments of subject imports were to OEMs/assemblers. *Id.*

U.S. consumption in 2018.¹¹³ The leading sources of nonsubject imports in 2018, the last year of the POI, were Korea and Taiwan.¹¹⁴

Current Reviews. The domestic industry was the second largest source of supply in the U.S. market during the POR, with a *** percent share of apparent U.S. consumption by quantity in 2023, up from *** percent in 2018.¹¹⁵ Dexstar was the only known U.S. producer during the POR.¹¹⁶ Subject imports were no longer a significant presence in the U.S. market; their volume was 1.8 million pounds in 2023 (only *** percent of apparent U.S. consumption), a *** percentage point decline since 2018.¹¹⁷

Nonsubject imports were the largest supplier of steel trailer wheels to the U.S. market.¹¹⁸ Nonsubject import volume was 80.1 million pounds in 2023, a *** percent increase since 2018; with a market share of *** percent in 2023, up from *** percent in 2018.¹¹⁹ The leading sources of nonsubject imports during the POR were India and Korea.¹²⁰

4. Substitutability and Other Conditions

Original Investigations. The Commission found a moderate-to-high degree of substitutability between domestically produced steel trailer wheels and subject imports from

¹¹³ Conf. Original Inv. Views at 34; *Original Determination*, USITC Pub. 4943 at 24. The Commission also observed that nonsubject imports were the smallest source of supply in the OEM/assemblers market and aftermarket, and their market shares increased throughout the POI. *Id.*

¹¹⁴ Conf. Original Staff Report at I-4, II-11; Conf. Original Inv. Views at 34; *Original Determination*, USITC Pub. 4943 at 24.

¹¹⁵ CR/PR at I-17, Table I-6. The domestic industry's volume was *** pounds in 2023. *Id.*

¹¹⁶ CR/PR at I-11.

¹¹⁷ CR/PR at I-17, Table I-6.

¹¹⁸ CR/PR at I-17, Table I-6. Nonsubject imports were followed by the domestic industry and subject imports. *See id.*

¹¹⁹ CR/PR at I-17, Table I-6.

¹²⁰ CR/PR at I-16, Table I-5.

China in the original investigations.¹²¹ It also found that price was among the most important factors in purchasing decisions.¹²²

Most responding firms reported that the cost of raw materials and the price of trailer wheels had increased due to the Section 232 tariffs on imported steel, but that there had been no impact on the overall demand for trailer wheels.¹²³ Steel trailer wheels themselves, however, were not subject to section 232 duties.¹²⁴ The Commission observed that additional duties of 10 percent were placed on steel trailer wheels from China in September 2018 pursuant to Section 301 of the Trade Act.¹²⁵ These additional duties increased to 25 percent in May 2019.¹²⁶

Current Reviews. The record in these five-year reviews contains no new information to indicate that the degree of substitutability between the domestic like product and subject imports, or the importance of price in purchasing decisions, has changed since the original investigations. Dexstar asserts that the U.S. market remains highly price sensitive based on the continued substitutable nature of imported and domestically produced steel trailer wheels, with price a very important factor in purchasing decisions.¹²⁷ Based on the available information in

¹²¹ Conf. Original Inv. Views at 35; *Original Determination*, USITC Pub. 4943 at 25.

¹²² Conf. Original Inv. Views at 36; *Original Determination*, USITC Pub. 4943 at 25.

¹²³ Conf. Original Inv. Views at 37; *Original Determination*, USITC Pub. 4943 at 26.

¹²⁴ See Conf. Inv. Staff Report at I-8 (“hot-rolled steel is a key raw material input in the production of trailer wheels subject to these investigations, and is subject to section 232 tariffs.”); see also CR/PR at I-6.

¹²⁵ Conf. Original Inv. Views at 37; *Original Determination*, USITC Pub. 4943 at 26.

¹²⁶ *Notice of Modification of Section 301 Action: China’s Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 Fed. Reg. 47974 (Sept. 21, 2018) (“*Modification of Section 301 Action*”); *Notice of Modification of Section 301 Action: China’s Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 Fed. Reg. 20459 (May 9, 2019) (“*Supplemental Modification of Section 301 Action*”); Conf. Original Inv. Views at 37; *Original Determination*, USITC Pub. 4943 at 26, I-5 n.14; see also Conf. Inv. Staff Report, at I-6 n.14.

¹²⁷ See Dexstar’s NOI Response at 13-14 (noting the Commission found a moderate-to-high degree of substitutability between subject imports wheels and the domestic product in the investigations).

these expedited reviews, we find that there is a moderate-to-high degree of substitutability between subject imports and the domestic like product and that price remains important in purchasing decisions.

C. Likely Volume of Subject Imports

1. Original Investigations

The Commission found that subject imports had a significant and increasing presence in the U.S. market during the POI and captured market share directly at the domestic industry's expense.¹²⁸ The volume of subject imports increased overall by 31.3 percent, from 108.3 million pounds in 2016 to 142.1 million pounds in 2018.¹²⁹ The subject imports' market share increased *** percentage points from 2016 to 2018, while the domestic industry's market share declined *** percentage points.¹³⁰

The Commission observed similar volume and market share trends for both OEM/assemblers and the aftermarket.¹³¹ Subject imports' market share in the OEM/assemblers market increased from *** percent in 2016 to *** percent in 2018.¹³² The domestic industry's market share in the OEM/assemblers market decreased from *** percent in 2016 to *** percent

¹²⁸ Conf. Original Inv. Views at 37-38; *Original Determination*, USITC Pub. 4943 at 26-27. Subject import volume was 54.3 percent lower in interim 2019 (15.5 million pounds) than in interim 2018 (33.9 million pounds). *Id.*

¹²⁹ Conf. Original Inv. Views at 37-38; *Original Determination*, USITC Pub. 4943 at 26-27.

¹³⁰ Conf. Original Inv. Views at 37-38; *Original Determination*, USITC Pub. 4943 at 26-27. Subject imports' total U.S. market share was lower in interim 2019 (*** percent) than in interim 2018 (*** percent). *Id.* The domestic industry's total U.S. market share was lower in interim 2019 (*** percent) than in interim 2018 (*** percent). *Id.*

¹³¹ Conf. Original Inv. Views at 38-39; *Original Determination*, USITC Pub. 4943 at 27.

¹³² Conf. Original Inv. Views at 38; *Original Determination*, USITC Pub. 4943 at 27.

in 2018.¹³³ Similarly, subject imports' market share in the aftermarket increased from *** percent in 2016 to *** percent in 2018.¹³⁴ The domestic industry's market share in the aftermarket decreased from *** percent in 2016 to *** percent in 2018.¹³⁵

The Commission further observed that the ratio of subject imports to the domestic industry's production increased from *** percent in 2016 to *** percent in 2018.¹³⁶

Consequently, the Commission found that the volume of subject imports and the increase in volume from 2016 to 2018 was significant in both absolute terms and relative to U.S. production and consumption.¹³⁷

2. Current Reviews

Subject imports remained in the U.S. market during the POR, but at much lower volumes than during the original investigation period given the disciplining effect of the orders.¹³⁸ Subject imports from China were 129.7 million pounds in 2018, 20.9 million pounds in 2019, 2.5 million pounds in 2020, 3.8 million pounds in 2021, 4.1 million pounds in 2022, and 1.8 million pounds in 2023.¹³⁹

The record in these five-year reviews contains limited information on the steel trailer wheel industry in China. The available information indicates that subject producers have the means to export significant volumes of subject merchandise to the U.S. market if the orders were

¹³³ Conf. Original Inv. Views at 38; *Original Determination*, USITC Pub. 4943 at 27.

¹³⁴ Conf. Original Inv. Views at 38; *Original Determination*, USITC Pub. 4943 at 27.

¹³⁵ Conf. Original Inv. Views at 38; *Original Determination*, USITC Pub. 4943 at 27.

¹³⁶ Conf. Original Inv. Views at 38; *Original Determination*, USITC Pub. 4943 at 27.

¹³⁷ Conf. Original Inv. Views at 39; *Original Determination*, USITC Pub. 4943 at 27.

¹³⁸ CR/PR at I-17, Table I-6.

¹³⁹ CR/PR at I-16—I-17, Tables I-5 & I-6. Thus, subject import volume was 98.6 percent lower in 2023 than in the last year of the investigations (2018). *Id.*

revoked.¹⁴⁰

The information available, including that submitted by Dexstar, indicates that the subject foreign industry possessed substantial capacity during the POR. Dexstar identified at least 39 possible producers of steel trailer wheels in China,¹⁴¹ and the available information indicates that a number of them operate multiple wheel plants and numerous production lines. For example, the record includes evidence that Jingu's 15 production lines across four plants boast an annual production capacity of 7 million wheels.¹⁴² Xiamen Sunrise Group Co., Ltd. ("Sunrise" or "SWG") also has multiple facilities and boasts an annual capacity of 4 million wheels.¹⁴³ Similarly, Xingmin Intelligent Transportation Systems (Group) Co., Ltd.'s ("Xingmin") website indicates it has an annual capacity of over 10 million wheels.¹⁴⁴

The information available also indicates that the Chinese industry remains a large exporter. We have no data sources that provide statistics or forecasts for Chinese exports specifically of steel trailer wheels or the trailers that use those wheels for the market in China. However, Dexstar contends that available data on Chinese exports of trailer parts (HTS 8716.90), shows that the Chinese industry has likely continued to grow significantly during the last five

¹⁴⁰ See CR/PR at I-19, Table I-7 (value of exports from China); Dexstar's Response to NOI at 20-22.

¹⁴¹ CR/PR at I-18, citing Dexstar's NOI Response at 20 & Exh. 33 (listing known Chinese producers and exporters).

¹⁴² Dexstar's NOI Response at 20 & Exh. 24 (excerpts from Zhejiang Jingu Co. Ltd.'s ("Jingu's") website). The company's website indicates that "Jingu is one of the largest steel wheel manufacturers in China" and "one of the largest steel wheel exporters." *Id.* at Exh. 24. The company's website indicates that a "5th plant of Jingu is being built now" with "2.5 million pieces passenger vehicle wheels and 1 million pieces commercial vehicle wheels will be added in ... this plant." *Id.*

¹⁴³ Dexstar's NOI Response at 20-21 & Exh. 25 (excerpts from Xiamen Sunrise Group Co., Ltd.'s ("Sunrise's") website). Sunrise's website confirms that the company plans to further expand: "SWG runs its business properly and firmly to expand its market shares step by step." *Id.* at Exh. 25.

¹⁴⁴ Dexstar's NOI Response at 21 & Exh. 26 (excerpts from Xingmin's website).

years.¹⁴⁵ Global Trade Atlas (“GTA”) data show that from 2018 to 2023, total Chinese exports of trailer parts (a broader category than steel trailer wheels) increased 27.7 percent by value (from \$1.6 billion to \$2.1 billion) and 17 percent by volume (from 760 million metric tons to 889 million metric tons.).¹⁴⁶

Available information also indicates that the U.S. market remains attractive to subject foreign producers. Subject imports maintained a presence in the U.S. market throughout the POR, accounting for *** percent of apparent U.S. consumption in 2023,¹⁴⁷ reflecting both continued interest in the U.S. market on the part of Chinese producers and a distribution network that would enable them to quickly re-enter the U.S. market for steel trailer wheels after revocation. According to GTA, the United States was the largest destination market for Chinese exports of merchandise under HS subheading 8716.90 in 2023, and the nearby Mexican and Canadian markets were the fifth and sixth largest destinations, respectively.¹⁴⁸ Finally, several countries (*i.e.*, the EU, the United Kingdom, and India) maintain antidumping duties on steel trailer wheels from China,¹⁴⁹ which makes it more likely that subject producers will re-direct shipments to the United States in the event of revocation.¹⁵⁰

Dexstar further asserts that the Chinese producers and exporters have taken steps to

¹⁴⁵ Dexstar’s NOI Response at 18.

¹⁴⁶ Dexstar’s NOI Response at 18 & Exh. 17 (GTA data). Dexstar asserts the GTA data indicates there has been a continued expansion in the Chinese industries that produce and export trailer parts, including steel trailer wheels. *Id.* at 18.

¹⁴⁷ CR/PR at I-17, Table I-6.

¹⁴⁸ CR/PR at I-19, Table I-7. As noted, HS subheading 8716.90 includes out-of-scope products and, thus, may be overstated. *Id.* China’s exports to Mexico increased from 39.9 million pounds in 2019 to 105.6 million pounds in 2023, and China’s exports to Canada increased from 31.3 million pounds in 2019 to 72.8 million pounds in 2023. *Id.* See also Dexstar’s NOI Response at 19.

¹⁴⁹ CR/PR at I-20; Dexstar’s NOI Response at Exhs. 22 & 23; Dexstar’s Final Comments at 5-6.

¹⁵⁰ See Dexstar’s NOI Response at 19.

retain their relationships with their U.S. customers and the ability to enter U.S. supply chains.¹⁵¹

It highlights a recent determination by Customs and Border Protection (“CBP”) that Jingu’s Thai subsidiary, Asia Wheel, allowed U.S. importers to evade the orders by finishing wheels in Thailand from Chinese wheel parts (the rim or the disc), and entered the finished product into the United States as nonsubject Thai wheels.¹⁵² Dexstar contends that Chinese producers are further processing Chinese parts for steel trailer wheels in third countries in an effort to evade the orders.¹⁵³

The information available indicates that Chinese capacity for steel trailer wheels was 209.8 million pounds in 2018 and their capacity utilization was *** percent.¹⁵⁴ The record contains no evidence as to Chinese producers’ current overall capacity or capacity utilization. However, information indicates that major producers are increasing their capacity and that access to otherwise attractive third-country export markets is being restricted by trade measures, that a number of Chinese producers produced substantial volumes of subject merchandise in 2023, that substantial excess capacity remains, and that additional production would be directed to the U.S. market.¹⁵⁵

Given the foregoing, including the significant volume and market share of subject imports during the original investigations, the continued presence of subject imports in the U.S. market

¹⁵¹ Dexstar’s NOI Response at 21.

¹⁵² Dexstar’s NOI Response at 22, Exh. 27 (Notice of Determination as to Evasion - EAPA Consolidated Case Number 7459 (CBP Aug. 7, 2023) (“EAPA 7459 Determination”), Exh. 28 (Commerce’s scope ruling, following CBP’s referral of the question to Commerce).

¹⁵³ See Dexstar’s NOI Response at 22.

¹⁵⁴ Conf. Inv. Staff Report at VII-5, VII-7, Table VII-3.

¹⁵⁵ See, e.g., CR/PR at I-18—I-19 (Chinese producers’ data); Dexstar’s NOI Response at 20-21 (Chinese production capacity); Dexstar’s NOI Response at 20-21.

during the POR indicating the attractiveness of the U.S. market, the Chinese industry's substantial and increasing capacity, including excess capacity, its large volume of exports, and the CBP determination of duty evasion by a subject Chinese manufacturer/exporter (indicating a continuing desire to access the U.S. market),¹⁵⁶ we find that the volume of subject imports from China would likely be significant, both in absolute terms and relative to consumption in the United States, if the orders were revoked.¹⁵⁷

D. Likely Price Effects

1. Original Investigations

The Commission determined that subject imports were having a significant adverse effect on U.S. prices in the original investigations.¹⁵⁸ It found a moderate-to-high degree of substitutability between subject imports and the domestic like product and that price was an

¹⁵⁶ See, e.g., *Cased Pencils from China*, Inv. No. 731-TA-669 (Fifth Review), USITC Pub. 5411 at 26 (March 2023) (“As further evidence of the Chinese producers’ continued interest in the U.S. market, ... CBP ... determined that cased pencils from China were transshipped via the Philippines into the United States to evade the antidumping duty order”); *Steel Wire Garment Hangers from China*, Inv. No. 731-TA-1123 (Second Review), USITC Pub. 4945 at 14-15 (Aug. 2019) (“Indeed, Chinese exporters’ repeated attempts to evade the antidumping duty order demonstrate the attractiveness of the U.S. market. ... CBP found that all of the SWG hangers imports from Malaysia actually originated in China, were transshipped through Malaysia, and were subject to the China-wide dumping rate of 187.25 percent ... Accordingly, the available data indicate that the Chinese industry has both the ability and the incentive to direct significant quantities of the subject merchandise to the U.S. market upon revocation.”).

¹⁵⁷ Although subject imports from China are currently subject to additional duties under section 301 and the inputs (e.g., hot-rolled steel) are subject to duties under section 232, neither Dexstar nor the two responding purchasers indicated that the Section 301 and 232 duties would prevent subject imports from entering the U.S. market at significant levels if the orders were revoked. See Dexstar’s Response to NOI at 17-23; see also CR/PR at I-6, Appendix D at D-3 (U.S. purchasers’ responses to “changes that have occurred” over the POR). Given the Chinese industry’s large size and export orientation, and the attractiveness of the U.S. market, we find that the Section 301 duties, and the Section 232 duties on the raw materials (steel inputs), would not likely prevent subject imports from increasing to significant levels if the orders were revoked.

The record of this review does not contain information concerning product shifting or inventories of subject merchandise.

¹⁵⁸ Conf. Original Inv. Views at 40; *Original Determination*, USITC Pub. 4943 at 28.

important factor in purchasing decisions.¹⁵⁹ The Commission found significant underselling by the subject imports over the POI given that there was extensive underselling of the domestic like product, the purchase costs of subject imports were lower than the prices for the domestic like product, and there were a substantial number of confirmed lost sales, all of which resulted in a market share shift.¹⁶⁰

The Commission also found that the domestic industry was unable to increase prices commensurate with rising costs. It observed that the domestic industry's ratio of cost of goods sold ("COGS") to net sales was high throughout the POI.¹⁶¹ From 2016 to 2018 – at a time when apparent U.S. consumption increased by *** percent but the volume of low-priced subject imports increased by *** percent – the domestic industry's unit COGS increased by *** percent and its net sales unit values increased by only *** percent.¹⁶² The Commission found that the cost-price squeeze was particularly prevalent between 2017 and 2018, when apparent U.S. consumption increased by *** percent, as the domestic industry's unit COGS increased by *** percent and its net sales unit values increased by only *** percent.¹⁶³ It further observed that as steel costs increased from January 2016 to July 2018, Dexstar was unable to raise its prices to cover its costs.¹⁶⁴ Consequently, the Commission found that the low-priced subject imports prevented the domestic industry from increasing prices which otherwise would have occurred to

¹⁵⁹ Conf. Original Inv. Views at 45; *Original Determination*, USITC Pub. 4943 at 31.

¹⁶⁰ Conf. Original Inv. Views at 40-45; *Original Determination*, USITC Pub. 4943 at 28-31.

¹⁶¹ Conf. Original Inv. Views at 44; *Original Determination*, USITC Pub. 4943 at 28.

¹⁶² Conf. Original Inv. Views at 44; *Original Determination*, USITC Pub. 4943 at 28.

¹⁶³ Conf. Original Inv. Views at 44; *Original Determination*, USITC Pub. 4943 at 28.

¹⁶⁴ Conf. Original Inv. Views at 44; *Original Determination*, USITC Pub. 4943 at 28. The Commission noted that a representative for Respondent TTT testified that it tried to pass on raw material cost increases "within days and weeks" and six of 11 responding purchasers reported that raw material costs affected their contracts for trailer wheels. *Id.* Nevertheless, ***. *Id.*

a significant degree.¹⁶⁵

In light of the significant underselling and substantial lost sales that led to the domestic industry losing market share to the subject imports, and the role of the subject imports in preventing the domestic industry from increasing prices which otherwise would have occurred to a significant degree, the Commission found that the subject imports had significant adverse effects on prices for the domestic like product.¹⁶⁶

2. Current Reviews

As discussed in Section III.B.3 above, we have found that there is a moderate-to-high degree of substitutability between subject imports and the domestic like product and that price remains important in purchasing decisions.

The record in these expedited reviews does not contain recent product-specific pricing information. Given that there is a moderate-to-high degree of substitutability between subject imports and the domestic like product and that price is an important factor in purchasing decisions, we find that the likely significant volume of subject imports would likely undersell the domestic like product to a significant degree, as during the original investigations, as a means of gaining market share.¹⁶⁷ Absent the discipline of the orders, the likely significant volume of low-priced subject imports would force the domestic industry to lower prices or forgo needed price

¹⁶⁵ Conf. Original Inv. Views at 45; *Original Determination*, USITC Pub. 4943 at 28.

¹⁶⁶ Conf. Original Inv. Views at 45; *Original Determination*, USITC Pub. 4943 at 31.

¹⁶⁷ The AUV of subject imports was \$0.73 per pound in 2018; U.S. producers' AUV was \$*** per pound in 2018. Conf. Inv. Staff Report at Table C-3. In contrast, the AUV of subject imports was \$1.86 per pound in 2023; U.S. producers' AUV was \$*** per pound in 2023. CR/PR at I-14, I-16, Tables I-4 & I-5.

increases, or else lose sales and market share to subject imports.¹⁶⁸ Consequently, we find that subject imports would likely have significant price effects on the domestic like product if the orders were revoked.

E. Likely Impact

1. Original Investigations

The Commission found that despite increases in apparent U.S. consumption from 2016 to 2018, most of the domestic industry's production and output-related indicators declined throughout the POI.¹⁶⁹ For example, from 2016 to 2018, the industry's capacity and total production decreased by *** percent and *** percent, respectively,¹⁷⁰ its capacity utilization rate decreased by *** percentage points,¹⁷¹ its total U.S. shipments decreased by *** percent,¹⁷² its market share decreased by *** percentage points from 2016 to 2018,¹⁷³ and its inventories decreased by *** percent.¹⁷⁴

The Commission also found that domestic industry's financial performance was generally poor throughout the POI.¹⁷⁵ From 2016 to 2018, the industry's total net sales revenues decreased

¹⁶⁸ Dexstar asserts that the U.S. market for steel trailer wheels remains highly price sensitive. Available import statistics show that the AUV of imported steel trailer wheels increased from \$1.45 per kg in 2018 to \$2.34 per kg in 2022, a 61 percent increase, indicating that the orders had a significant effect on import prices. Dexstar's NOI Response at 25.

¹⁶⁹ Conf. Original Inv. Views at 46; *Original Determination*, USITC Pub. 4943 at 32.

¹⁷⁰ Conf. Original Inv. Views at 46; *Original Determination*, USITC Pub. 4943 at 32. The Commission further observed that the domestic industry's capacity was *** percent lower in interim 2019 than in interim 2018. *Id.* Its total production was *** percent lower in interim 2019 than in interim 2018. *Id.*

¹⁷¹ Conf. Original Inv. Views at 46-47; *Original Determination*, USITC Pub. 4943 at 32. The industry's capacity utilization rate was *** percentage points lower in interim 2019 than in interim 2018. *Id.*

¹⁷² Conf. Original Inv. Views at 46; *Original Determination*, USITC Pub. 4943 at 33.

¹⁷³ Conf. Original Inv. Views at 47; *Original Determination*, USITC Pub. 4943 at 33.

¹⁷⁴ Conf. Original Inv. Views at 47; *Original Determination*, USITC Pub. 4943 at 33.

¹⁷⁵ Conf. Original Inv. Views at 48; *Original Determination*, USITC Pub. 4943 at 33.

by *** percent,¹⁷⁶ while *** worsened by *** percent.¹⁷⁷ The ratio of operating income to net sales decreased by *** percentage points from 2016 to 2018,¹⁷⁸ while total assets decreased *** percent¹⁷⁹ and the domestic industry's return on assets decreased by *** percentage points.¹⁸⁰ The Commission also noted that Dexstar reported actual and potential negative effects on investment, growth, and development due to the subject imports.¹⁸¹

Further, the Commission noted that low-priced subject imports increased significantly in absolute terms and relative to U.S. production and consumption from 2016 to 2018, significantly undersold the domestic like product, and took market share from the domestic industry.¹⁸² It found that the low-priced subject imports limited the domestic industry's ability to increase prices sufficiently to recover increasing costs, especially between 2017 and 2018.¹⁸³ As a result, the Commission found the domestic industry's production, U.S. shipments, employment, revenues, and profits were lower than they otherwise would have been during the full years of the POI.¹⁸⁴ In light of these indicators and trends, the Commission concluded that subject imports had a significant adverse impact on the domestic industry.¹⁸⁵

¹⁷⁶ Conf. Original Inv. Views at 48; *Original Determination*, USITC Pub. 4943 at 33.

¹⁷⁷ Conf. Original Inv. Views at 48; *Original Determination*, USITC Pub. 4943 at 34.

¹⁷⁸ Conf. Original Inv. Views at 48; *Original Determination*, USITC Pub. 4943 at 34.

¹⁷⁹ See Conf. Original Inv. Views at 49 n.209; *Original Determination*, USITC Pub. 4943 at 34 n.209. The domestic industry's total net assets were \$*** in 2016, \$*** in 2017, and \$*** in 2018. *Id.*

¹⁸⁰ *Calculated from* Conf. Original Inv. Views at 49 n.209; *Original Determination*, USITC Pub. 4943 at 34 n.209.

¹⁸¹ Conf. Original Inv. Views at 49; *Original Determination*, USITC Pub. 4943 at 34. However, the domestic industry's capital expenditures increased from 2016 to 2018. *Id.*

¹⁸² Conf. Original Inv. Views at 49; *Original Determination*, USITC Pub. 4943 at 34.

¹⁸³ Conf. Original Inv. Views at 49; *Original Determination*, USITC Pub. 4943 at 34.

¹⁸⁴ Conf. Original Inv. Views at 49-50; *Original Determination*, USITC Pub. 4943 at 34.

¹⁸⁵ Conf. Original Inv. Views at 50; *Original Determination*, USITC Pub. 4943 at 34.

The Commission also considered whether there were other factors that may have had an impact on the domestic industry during the POI to ensure that it was not attributing injury from such other factors to subject merchandise.¹⁸⁶ Respondents argued that any *** condition was attributable to ***.¹⁸⁷ The Commission found that ***.

The Commission found that, in any event, the domestic industry was materially injured by reason of subject imports in the merchant market, regardless of Dexstar's transfers to its downstream affiliates.¹⁸⁸ It observed that the volume and share of subject imports in the merchant market increased from 2016 to 2018, while the domestic industry's U.S. shipments in the merchant market declined by *** percent.¹⁸⁹ The Commission also noted that the domestic industry's ratio of COGS to net sales was high in the merchant market, with the industry's unit COGS having increased by *** percent from 2016 to 2018 while its net sales unit values increased by only *** percent.¹⁹⁰ In light of these factors, the Commission concluded that there was a cost-price squeeze for merchant market shipments, and that the industry's financial performance in that market showed ***.¹⁹¹

The Commission was not persuaded by the Respondents' argument that subject imports were purchased for a variety of non-price reasons, including quality and availability.¹⁹² It observed that a majority of market participants reported that the domestic like product was

¹⁸⁶ Conf. Original Inv. Views at 50; *Original Determination*, USITC Pub. 4943 at 35.

¹⁸⁷ Conf. Original Inv. Views at 50; *Original Determination*, USITC Pub. 4943 at 35.

¹⁸⁸ Conf. Original Inv. Views at 52; *Original Determination*, USITC Pub. 4943 at 36.

¹⁸⁹ Conf. Original Inv. Views at 53; *Original Determination*, USITC Pub. 4943 at 36.

¹⁹⁰ Conf. Original Inv. Views at 53; *Original Determination*, USITC Pub. 4943 at 36.

¹⁹¹ Conf. Original Inv. Views at 53; *Original Determination*, USITC Pub. 4943 at 37.

¹⁹² Conf. Original Inv. Views at 54; *Original Determination*, USITC Pub. 4943 at 37.

always or frequently interchangeable with subject imports, and that the two were comparable with respect to “quality meets industry standards,” “quality exceeds industry standards,” and “torque performance.”¹⁹³ The Commission further observed that multiple purchasers confirmed that they bought subject imports instead of the domestic like product primarily because the subject imports were lower priced.¹⁹⁴

Nor was the Commission persuaded by the argument that the domestic industry was neither willing nor able to satisfy the entirety of U.S. demand for steel trailer wheels.¹⁹⁵ The Commission found that such allegations did not explain the industry’s lost sales and market share, including in the merchant market, the industry’s excess capacity, or the underselling by subject imports.¹⁹⁶

The Commission also examined the role of nonsubject imports and found their relatively small volume could not explain the loss in the domestic industry’s market share, output, and revenues, or the adverse price effects it attributed to the subject imports.¹⁹⁷

¹⁹³ Conf. Original Inv. Views at 54; *Original Determination*, USITC Pub. 4943 at 37.

¹⁹⁴ Conf. Original Inv. Views at 54; *Original Determination*, USITC Pub. 4943 at 37.

¹⁹⁵ Conf. Original Inv. Views at 55; *Original Determination*, USITC Pub. 4943 at 38.

¹⁹⁶ Conf. Original Inv. Views at 55; *Original Determination*, USITC Pub. 4943 at 38.

¹⁹⁷ Conf. Original Inv. Views at 56; *Original Determination*, USITC Pub. 4943 at 38. The Commission noted that the volume of nonsubject imports in the U.S. market were substantially smaller than the volume of subject imports throughout the POI. *Id.* Only after provisional duties took effect did nonsubject imports and their market share increase. *Id.* The Commission found that any gains in the market share by the nonsubject imports did not negate the larger gains made by subject imports and their consequent impact on the domestic industry. *Id.*

2. Current Reviews¹⁹⁸

The record in these five-year reviews contains limited information concerning the domestic industry's performance since the original investigations.

The information available indicates that the domestic industry's trade and financial performance was generally stronger in 2023 as compared to its performance in 2018, the last year of the period examined in the original investigations. The domestic industry's capacity, at *** pounds, production, at *** pounds, U.S. shipments, at *** pounds, net sales value, at ***, and share of apparent consumption, at *** percent, were higher in 2023 than during the original investigations.¹⁹⁹

Despite this improvement in the trend of the domestic industry's trade and financial performance since 2018, several factors point to current industry vulnerability: the market (apparent consumption) has declined almost *** percent since 2018, from *** pounds to *** pounds; the domestic industry continues to suffer an operating loss (of *** percent, relative to its net sales) in 2023, despite the imposition of antidumping and countervailing duty orders; and capacity utilization remains extremely low at *** percent, only marginally better than the *** percent reported in 2018, and below the levels of the first two years of the POI. In addition, the RVIA reports a contraction in demand, as evidenced by a sharp decrease in shipments of RVs and towable trailers following a peak in 2021. We therefore find that the domestic industry is

¹⁹⁸ In its expedited review of the antidumping duty order, Commerce determined that revocation of the order would result in the continuation or recurrence of dumping, with margins of up to 44.35 percent. *Commerce's Final Results First Review AD Order*, 89 Fed. Reg. at 95179-80 and accompanying IDM (AD) at 9. In its expedited review of the countervailing duty order, Commerce determined that revocation of the order would result in the continuation or recurrence of countervailable subsidies at net countervailable subsidy rates of up to 387.38 percent *ad valorem*. *Commerce's Final Results First Review CVD Order*, 89 Fed. Reg. at 95175) and accompanying IDM (CVD) at 18.

¹⁹⁹ CR/PR at I-14, I-16, Tables I-4 & I-6.

vulnerable to the continuation or recurrence of material injury in the event of revocation of the orders.²⁰⁰

Based on the information available on the record, we find that revocation of the order would likely result in a significant volume of subject imports that likely would undersell the domestic like product to a significant degree. Given the moderate-to-high degree of substitutability between the domestic like product and subject imports and the importance of price in purchasing decisions, significant volumes of low-priced subject imports would likely capture sales and market share from the domestic industry and/or depress or suppress domestic prices to a significant degree. The likely significant volume of low-priced subject imports and their adverse price effects would likely have a significant adverse impact on the production, shipments, sales, market share, and revenues of the domestic industry, which, in turn, would have a direct adverse impact on the industry's profitability and employment, as well as its ability to raise capital and make and maintain necessary capital investments. We thus conclude that, if the orders were revoked, subject imports from China would be likely to have a significant adverse impact on the domestic industry within a reasonably foreseeable time.

We have also considered the role of factors other than subject imports, including nonsubject imports. Nonsubject imports have significantly increased their presence in the U.S. market since the original investigation period, accounting for *** percent of apparent U.S. consumption in 2023 as compared to *** percent in 2018, the last year of the original POI.²⁰¹ We also note that some of the nonsubject imports from Thailand during the POR have been found by

²⁰⁰ CR/PR at I-14, I-16, Tables I-4 & I-6.

²⁰¹ CR/PR at I-17, Table I-6.

Commerce to be evading dumping duties imposed on subject Chinese merchandise.²⁰² However, the record provides no indication that the presence of nonsubject imports would prevent subject imports from China from significantly increasing their presence in the U.S. market after revocation. In light of the moderate-to-high degree of substitutability between subject imports and the domestic like product and the importance of price to purchasers,²⁰³ it is likely that the increase in low-priced subject imports would come at least in part at the expense of the domestic industry and/or depress or suppress prices for the domestic like product. It is also worth noting that when nonsubject imports increased after imposition of the orders, their AUVs were substantially higher than those of the subject imports they replaced.²⁰⁴ Consequently, we find that any future effects of nonsubject imports would be distinct from the likely effects attributable to subject imports and that nonsubject imports would not prevent subject imports from having a significant impact on the domestic industry.

We recognize that apparent U.S. consumption of steel trailer wheels was *** percent lower in 2023 than in 2018, the last year of the original investigations.²⁰⁵ As discussed above in Section III.B.2., Dexstar asserts that demand for towable trailers declined sharply over the last two years, and that an expected moderate recovery is unlikely to return apparent U.S. consumption to levels seen in the original investigation.²⁰⁶ Given the moderate-to-high degree of substitutability between subject imports and the domestic like product and the importance of price to

²⁰² See section III.C., above.

²⁰³ See Conf. Original Inv. Views at 45; *Original Determination*, USITC Pub. 4943 at 31. See also section III.D., above.

²⁰⁴ See CR/PR at I-16—I 17, Tables I-5 & I-6.

²⁰⁵ Calculated from CR/PR at I-17, Table I-6.

²⁰⁶ Dexstar's NOI Response at 7.

purchasers, the significant volume of low-priced subject imports that is likely after revocation would exacerbate any effects of slowing demand on the domestic industry, by further reducing the industry's sales and placing additional downward pressure on domestic prices. Given these considerations, we find that the likely effects attributable to subject imports are distinguishable from any likely effects of reduced demand if the orders were revoked.

IV. Conclusion

For the foregoing reasons, we determine that revocation of the antidumping and countervailing duty orders on steel trailer wheels from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

Information obtained in these reviews

Background

On August 1, 2024, the U.S. International Trade Commission (“Commission”) gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”),¹ that it had instituted reviews to determine whether revocation of antidumping and countervailing duty orders on steel trailer wheels (“trailer wheels”) from China would likely lead to the continuation or recurrence of material injury to a domestic industry.² All interested parties were requested to respond to this notice by submitting certain information requested by the Commission.^{3 4} Table I-1 presents information relating to the background and schedule of this proceeding:

Table I-1
Trailer wheels: Information relating to the background and schedule of this proceeding

Effective date	Action
August 1, 2024	Notice of initiation by Commerce (89 FR 62717, August 1, 2024)
August 1, 2024	Notice of institution by Commission (89 FR 62783, August 1, 2024)
November 4, 2024	Commission’s vote on adequacy
December 2, 2024	Commerce’s results of its expedited reviews (AD: 89 FR 95179; CVD: 89 FR 95174)
March 7, 2025	Commission’s determination and views

¹ 19 U.S.C. 1675(c).

² 89 FR 62783, August 1, 2024. In accordance with section 751(c) of the Act, the U.S. Department of Commerce (“Commerce”) published a notice of initiation of five-year reviews of the subject antidumping and countervailing duty orders. 89 FR 62717, August 1, 2024. Pertinent Federal Register notices are referenced in app. A, and may be found at the Commission’s website (www.usitc.gov).

³ As part of their response to the notice of institution, interested parties were requested to provide company-specific information. Information regarding responses to the notice of institution is presented in app. B. Summary data compiled in the original investigations are presented in app. C.

⁴ Interested parties were also requested to provide a list of three to five leading purchasers in the U.S. market for the domestic like product and the subject merchandise. Presented in app. D are the responses received from purchaser surveys transmitted to the purchasers identified in this proceeding.

The original investigations

The original investigations resulted from petitions filed on August 8, 2018 with Commerce and the Commission by Dexstar Wheel (“Dexstar”), Elkhart, Indiana.⁵ On July 9, 2019, Commerce determined that imports of trailer wheels from China were being sold at less than fair value (“LTFV”) and subsidized by the Government of China.⁶ The Commission determined on August 22, 2019 that the domestic industry was materially injured by reason of LTFV and subsidized imports of trailer wheels from China.⁷ On September 3, 2019, Commerce issued its antidumping and countervailing duty orders with final weighted-average dumping margins ranging from 38.27 to 44.35 percent and net subsidy rates ranging from 386.45 to 388.31 percent.⁸

Previous and related investigations

The Commission has not conducted prior investigations on trailer wheels. However, the Commission has conducted four previous import relief investigations on merchandise that is similar to trailer wheels, as presented in table I-2.

Table I-2
Trailer wheels: Previous and related Commission proceedings and current status

Date	Number	Country	ITC original determination	Current status
1986	731-TA-335	Brazil	Affirmative	Revoked following negative Commission determination on remand
1988	701-TA-296 and 731-TA-420	Brazil	Negative	No duty imposed
2011	701-TA-296 and 731-TA-1182	China	Negative	No duty imposed
2019	701-TA-602 and 731-TA-1412	China	Affirmative	Ongoing first expedited review

Source: U.S. International Trade Commission publications and Federal Register notices.

Note: “Date” refers to the year in which the investigation was instituted by the Commission.

⁵ Steel Trailer Wheels from China, Inv. Nos. 731-TA-609 and 731-1421 (Final), USITC Publication 4943, August 2019 (“Original publication”), p. I-1.

⁶ 84 FR 32707 and 84 FR 32723, July 9, 2019.

⁷ 84 FR 45172, August 28, 2019. The Commission also found that imports subject to Commerce’s affirmative critical circumstances determination were not likely to undermine seriously the remedial effect of the order on China.

⁸ 84 FR 45952 September 3, 2024.

Commerce's five-year reviews

Commerce announced that it would conduct expedited reviews with respect to the orders on imports of trailer wheels from China with the intent of issuing the final results of these reviews based on the facts available not later than November 29, 2024.⁹ Commerce publishes its Issues and Decision Memoranda and its final results concurrently, accessible upon publication at <https://access.trade.gov/public/FRNoticesListLayout.aspx> and subsequently on the Commission's Electronic Document Information System ("EDIS"). Issues and Decision Memoranda contain complete and up-to-date information regarding the background and history of the order, including scope rulings, duty absorption, changed circumstances reviews, and anticircumvention, as well as any decisions that may have been pending at the issuance of this report. Any foreign producers/exporters that are not currently subject to the antidumping and countervailing duty orders on imports of trailer wheels from China are noted in the sections titled "The original investigations" and "U.S. imports," if applicable.

⁹ Letter from Eric Greynolds, Office Director, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, September 24, 2024.

The product

Commerce's scope

Commerce has defined the scope as follows:

The products subject to these orders are certain on-the-road steel wheels, discs, and rims for tubeless tires with a nominal wheel diameter of 12 inches to 16.5 inches, regardless of width. Certain on-the-road steel wheels with a nominal wheel diameter of 12 inches to 16.5 inches within the scope are generally for road and highway trailers and other towable equipment, including, inter alia, utility trailers, cargo trailers, horse trailers, boat trailers, recreational trailers, and towable mobile homes. The standard widths of certain on-the-road steel wheels are 4 inches, 4.5 inches, 5 inches, 5.5 inches, 6 inches, and 6.5 inches, but all certain on-the-road steel wheels, regardless of width, are covered by the scope.

The scope includes rims and discs for certain on-the-road steel wheels, whether imported as an assembly, unassembled, or separately. The scope includes certain on-the-road steel wheels regardless of steel composition, whether clad or not clad, whether finished or not finished, and whether coated or uncoated. The scope also includes certain on-the-road steel wheels with discs in either a "hub-piloted" or "stud-piloted" mounting configuration, though the stud-piloted configuration is most common in the size range covered.

All on-the-road wheels sold in the United States must meet Standard 110 or 120 of the National Highway Traffic Safety Administration's (NHTSA) Federal Motor Vehicle Safety Standards, which requires a rim marking, such as the "DOT" symbol, indicating compliance with applicable motor vehicle standards. See 49 CFR 571.110 and 571.120. The scope includes certain on-the-road steel wheels imported with or without NHTSA's required markings.

Certain on-the-road steel wheels imported as an assembly with a tire mounted on the wheel and/or with a valve stem or rims imported as an

assembly with a tire mounted on the rim and/or with a valve stem are included in the scope of these orders. However, if the steel wheels or rims are imported as an assembly with a tire mounted on the wheel or rim and/or with a valve stem attached, the tire and/or valve stem is not covered by the scope.

The scope includes rims, discs, and wheels that have been further processed in a third country, including, but not limited to, the painting of wheels from China and the welding and painting of rims and discs from China to form a steel wheel, or any other processing that would not otherwise remove the merchandise from the scope of the orders if performed in China.

Excluded from this scope are the following: (1) Steel wheels for use with tube-type tires; such tires use multi piece rims, which are two-piece and three-piece assemblies and require the use of an inner tube; (2) aluminum wheels; (3) certain on-the-road steel wheels that are coated entirely in chrome. This exclusion is limited to chrome wheels coated entirely in chrome and produced through a chromium electroplating process, and does not extend to wheels that have been finished with other processes, including, but not limited to, Physical Vapor Deposition (PVD); (4) steel wheels that do not meet Standard 110 or 120 of the NHTSA's requirements other than the rim marking requirements found in 49 CFR 571.110S4.4.2 and 571.120S5.2; (5) steel wheels that meet the following specifications: steel wheels with a nominal wheel diameter ranging from 15 inches to 16.5 inches, with a rim width of 8 inches or greater, and a wheel backspacing ranging from 3.75 inches to 5.5 inches; and (6) steel wheels with wire spokes.¹⁰

¹⁰ 84 FR 45952, September 3, 2019.

U.S. tariff treatment

Steel trailer wheels are currently imported under Harmonized Tariff Schedule of the United States (“HTS”) statistical reporting number 8716.90.5035. This statistical reporting number covers trailer steel wheels measuring 30 to 42 centimeters in diameter (approximately 11.8 to 16.5 inches), whether or not assembled.¹¹ Wheels entered with a tire mounted on them are imported under HTS statistical reporting number 8716.90.5059. The general rate of duty is 3.1 percent ad valorem for HTS subheading 8716.90.50.¹² Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Effective September 24, 2018, steel trailer wheels originating in China became subject to an additional 10 percent ad valorem duty under section 301 of the Trade Act of 1974.¹³ Effective May 10, 2019, this section 301 duty was increased to an additional 25 percent ad valorem duty.¹⁴

Effective March 23, 2018, hot-rolled steel, a nonsubject product that is the main input in the production of steel trailer wheels, became subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended.¹⁵ ¹⁶ Trailer wheels themselves, however, are not subject to section 232 duties.

¹¹ This statistical reporting number includes wheels of diameter 11.8 and 11.9 inches, which would be outside of the scope identified by Commerce.

¹² USITC, HTS (2023) Basic Edition, Publication 5483, January 2024, pp. 87-32.

¹³ 83 FR 47974, September 21, 2018.

¹⁴ 84 FR 20459, May 9, 2019. See also HTS heading 9903.88.03 and U.S. notes 20(e) and 20(f) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2024) Basic Edition, USITC Publication 5483, January 2024, pp. 99-III-27–99-III-51, 99-III-301.

¹⁵ See also HTS heading 9903.80.01 and U.S. notes 16(a) and 16(b) and related tariff provisions for this duty treatment. USITC, HTS (2024) Basic Edition, USITC Publication 5483, January 2024, pp. 72-14; 99-III-5–99-III-7.

¹⁶ Section 232 import duties on steel articles currently cover all countries of origin except Argentina, Australia, Brazil, Canada, Mexico, and South Korea. Imports from Australia, Canada, and Mexico are exempt from section 232 duties and quotas on steel articles, while imports originating in Argentina, Brazil, and South Korea are exempt from duties but are instead subject to absolute quotas. EU member countries (effective January 1, 2022), Japan (effective April 1, 2022), and the United Kingdom (effective June 1, 2022) are currently subject to tariff-rate quotas (“TRQs”) for steel articles, and imports that exceed the TRQ limits are subject to the section 232 tariffs. Section 232 import duties on steel articles originating in Turkey were temporarily raised from 25 percent to 50 percent, effective August 13, 2018, but restored to 25 percent effective May 21, 2019. In addition, section 232 duties on steel articles originating in Ukraine are suspended, effective June 1, 2022, to June 1, 2025. 83 FR 11625, March 15, 2018; 83 FR 13361, March 28, 2018; 83 FR 20683, May 7, 2018; 83 FR 25857, June 5, 2018; 83 FR 40429, August 15, 2018; 84 FR 23987, May 23, 2019; 87 FR 11, January 3, 2022; 87 FR 19351, April 1, 2022; 87 FR 33407, June 2, 2022; 87 FR 33591, June 3, 2022; 88 FR 36437, June 5, 2023; 89 FR 48233, June 5, 2024.

Description and uses¹⁷

The imported product subject to these reviews is certain on-road steel wheels, discs, and rims for tubeless tires, with a nominal rim diameter of 12 inches to 16.5 inches regardless of width, for use in road and highway trailers and other towable equipment.^{18 19} When imported, these trailer wheels may or may not have tires mounted on the wheel or rim and may or may not be attached to a valve stem. Within the U.S. market, trailer wheels are sold to either the assembly/original equipment manufacturing (“OEM”) market or to the aftermarket. During the original investigations, industry representatives reported that approximately 70 percent of trailer wheels were sold to assembly/OEM market, while the remaining 30 percent were sold to the aftermarket.

In-scope trailer wheels are used for a variety of trailers, including utility trailers, cargo trailers, horse trailers, boat trailers, and towable recreational trailers (towable RVs), as well as mobile homes (manufactured homes). Mobile homes use in-scope rims without a disc and are sold to mobile home OEMs, which attach the rim directly to specialized hubs using axle-mounting bolts. Subject trailer wheels are built to carry loads two-and-a-half to three times heavier than passenger vehicles.

All on-road trailer wheels must meet Standard 110 or Standard 120 of the National Highway Traffic Safety Administration’s (NHTSA’s) Federal Motor Vehicle Safety Standards.²⁰ Both U.S. producers and U.S. importers of trailer wheels utilize third-party testing facilities to ensure their products meet NHTSA’s requirements.

Steel trailer wheels are distinguishable by certain production features such as bearings and coating and by their center-mounting. There are two standard mounting configurations that attach a wheel disc to an axle: “hub-piloted,” where the torque is applied via the hub, and “stud-piloted,” where the torque is applied via the studs. Trailer wheels produced in both the

¹⁷ Unless otherwise noted, this information is based on Steel Trailer Wheels from China, Investigation Nos. 701-TA-609 and 731-TA-1421 (Final), USITC Publication 4943, August 2019 (“Original publication”), pp. I-10–I-15.

¹⁸ The rim of the trailer wheel is the circular channel onto which the tire is mounted on the wheel. The disc of the trailer wheel is the center portion that allows the wheel to be attached to the axle hub, and hence the axle.

¹⁹ The width of in-scope trailer wheels varies but comes in standard sizes: 4 inches, 4.5 inches, 5 inches, 5.5 inches, 6 inches, and 6.5 inches for trailer wheels with a diameter of 12 to 16.5 inches. The specifications are the same in both the U.S. and China.

²⁰ Offroad trailer wheels do not need to meet these standards.

U.S. and China are primarily stud-piloted, where a circle around the stud holes drives the force to the outer diameters of the wheel.

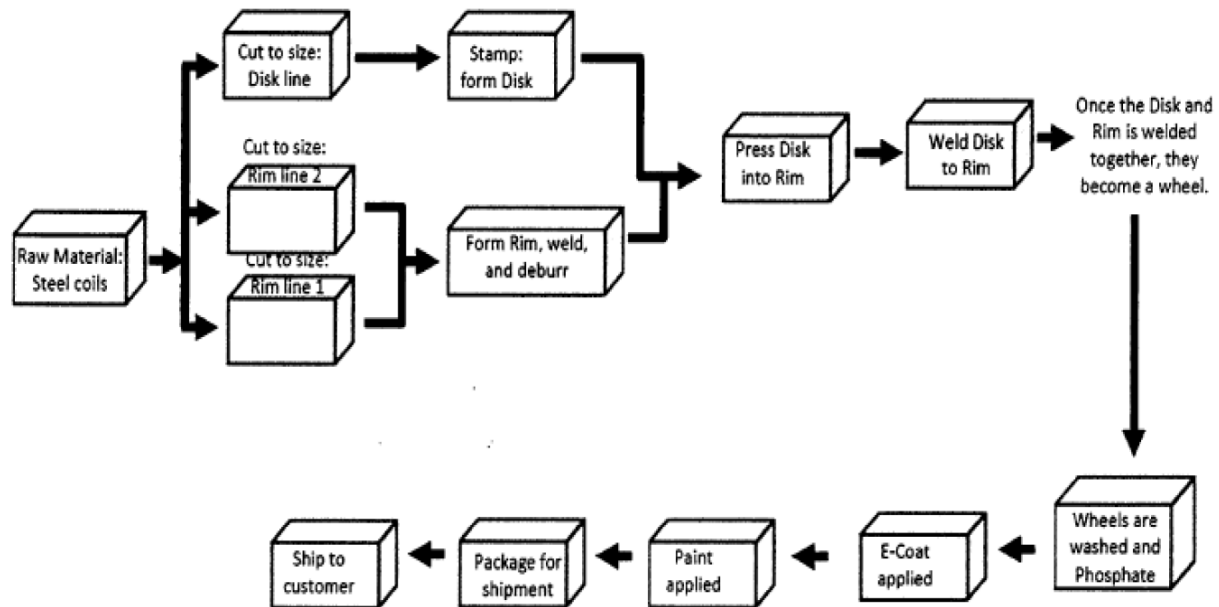
Torque, through clamping force, is the tension in the stud that holds the wheel in place,²¹ and is a key quality and safety consideration in the trailer wheel market. Trailer wheel producers and assemblers seek to improve the clamp force and eliminate “wheel-offs” (where the wheel falls off the axle when the trailer is in motion) through bolt and wheel retention on the axle hub. Technology to improve clamp force is utilized by producers in both the United States and China; this includes beveling the bolt holes to secure a tighter hold to the axle as well as eliminating paint on the back of the wheel, so the wheel remains securely attached to the axle.

²¹ Torque is the twisting force used to create tension (i.e., the resistance of the nut to turn). Tension is the stretching of a bolt or stud when a fastener is applied to create clamping force. Tire Business, <https://www.tirebusiness.com/article/20030707/NEWS/307079998/wheel-maintenance-got-you-torqued-off>, retrieved September 26, 2024.

Manufacturing process²²

The manufacturing process of trailer wheels begins with the production of the two components: discs and rims (see figure I-1). The rim and the disc are produced from carbon or high strength low allow (“HSLA”) hot-rolled steel. U.S. producer Dexstar uses both carbon and HSLA steel, whereas Chinese producer Jingu uses only HSLA steel. The steel coil used in production is of a predetermined width and thickness based on the wheel being made.

Figure I-1:
Trailer wheels: Manufacturing process map



Source: Original publication, p. I-16.

For the rim, the coil is unwound and cut to length, then rounded and butt-welded together where the ends of the rounded steel meet. This forms the circular hoop or band of the wheel. Rolling strands are then used to create the final shape of the rim; the geometry of the band profile determines the strength of the wheel and how much load the wheel can carry. To create the disc, producers use a wider, thicker hot-rolled steel coil. The disc is stamped and formed with a curved edge that allows it to be attached to the rim. A press stamps out the center bore, bolt holes, and any design holes. For discs with beveled bolt holes, the bevel is created during this disc-stamping process.

²² Unless otherwise noted, this information is based on Original publication, pp. I-15–I-18.

Once both the disc and the rim are completed, the two components are welded together to create the final wheel.²³ Dexstar does not sell individual discs and only sells rims for mobile home use; assemblers in the United States are not known to weld discs to rims. U.S. producers may purchase the disc and rim separately, rather than manufacture each, and weld the components together into the finished wheel.

The final wheel is then cleaned, and producers apply an e-coat, or cationic electro-deposited primer base paint coat, to the wheels. The wheels are then either coated with a polyester powder paint or galvanized for added corrosion protection. Both U.S. and Chinese producers follow the same e-coating and painting or galvanizing process. For galvanized wheels, U.S. producer Dexstar has a tolling agreement with a company in Tennessee that applies the galvanizing finish by hot-dipping the wheels in molten zinc then returns the wheel to Dexstar for sale. Dexstar also offers an extended corrosion-resistance painting process called Galvestar, which includes e-coat galvanizing and painting steps. After painting, the wheels go through an oven process to cure the paint onto the wheel. The wheels are then ready for shipment or assembly.

The production process at Dexstar is highly automated, including automated equipment, welding, and painting. Trailer wheel production in China, however, relies on manual production lines. Production time for Jingu is approximately 17 days from receiving the raw material through packaging the wheels for shipment.

²³ For trailer wheels used for mobile homes, only the rim is used.

The industry in the United States

U.S. producers

During the final phase of the original investigations, the Commission received U.S. producer questionnaires from two firms, which accounted for the vast majority of production of trailer wheels in the United States during 2018.²⁴ Dexstar accounted for *** percent of reported production in the United States in 2018 and Carlstar Group LLC (“Carlstar”) accounted for *** percent.²⁵

In its response to the Commission’s notice of institution in these current reviews, the domestic interested party, Dexstar, identified itself as the only currently operating producer of trailer wheels, and also identified two additional U.S. firms Dexstar reports have the ability to produce trailer wheels. Dexstar, providing U.S. industry data in response to the Commission’s notice of institution, responded that it accounted for approximately 100 percent of production of trailer wheels in the United States during 2023.²⁶

²⁴ Original publication, p. III-1.

²⁵ Original confidential report, Table III-1.

²⁶ Domestic interested party’s response to the notice of institution, September 3, 2024, p. 1 and pp. 11-12.

Recent developments

Table I-3 presents events in the U.S. industry since the Commission’s original investigations.²⁷

Table I-3
Trailer wheels: Developments in the U.S. industry

Item	Firm	Event
Expansion	Dexstar	In 2020, Dexstar announced an ongoing expansion project for its facility in Elkhart, Indiana, which was expected to be fully in place by 2023. Dexstar made additional changes to increase its capacity, including ***.
End of U.S. production	Carlstar	Carlstar is believed to have ceased U.S. production of steel trailer wheels. The steel trailer wheels in their 2023 catalog do not indicate that they are made in the USA, as other products in the catalog do.
Acquisition	Carlstar	Carlstar Group LLC was acquired by Titan International, Inc. for \$296 million on February 29, 2024.
End of U.S. production	American Wheel Corporation	American Wheel Corporation is believed to have ceased U.S. production of steel trailer wheels. The Google Maps profile for the company indicates that it is permanently closed and there is evidence that the plant location was listed as for sale for redevelopment in 2019.
Change in Ownership	Indiana Wheel Company	Indiana Wheel Company, a joint venture with Chinese wheel producer Zhejiang Jingu Company Limited (Jingu), announced plans to establish a plant in Plymouth, Indiana in 2019 with a nearly \$23 million capital investment with production starting in 2019. Jingu sold its stake in the joint venture in 2021 to a U.S. owner. However, Indiana Wheel Company announced an anticipated year-long pause in production in June 2022, with anticipation that operations will resume. As of September 26, 2024, there is no indication that operations have resumed. ***.

²⁷ For recent developments, in tariff treatment, please see “U.S. tariff treatment” section.

Table I-3 continued
Trailer wheels: Developments in the U.S. industry

Item	Firm	Event
Plant Opening	Saylor Wheel LLC	In May 2023, Saylor Wheel LLC (Saylor) announced a planned tire-and-wheel assembly plant for the trailer industry in Mississippi with plans to expand operation into production of steel wheels. As of October 2024, Saylor will reportedly launch its U.S. manufacturing operations by the end of the fourth quarter 2024.
Contraction in demand		Using shipments of RVs and towable trailers as a proxy for the demand in steel trailer wheels, there are indications that U.S. demand for steel trailer wheels has fallen. The RV Industry Association indicates that there has been a sharp decrease in overall RV shipments and towable trailer shipments following a peak in 2021.

Source: RV Business, <https://rvbusiness.com/dexstar-wheel-awarded-590000-for-expansion-project/>, retrieved, September 10, 2024; Domestic interested party's response to the notice of institution, September 3, 2024, p. 12; Domestic interested party's response to the notice of institution, September 3, 2024, exh. 10; Domestic interested party's response to the notice of institution, September 3, 2024, exh. 9; Domestic interested party's response to the notice of institution, September 3, 2024, p. 10; Domestic interested party's response to the notice of institution, September 3, 2024, exh. 8; Google Page for American Wheel Corporation https://www.google.com/maps/place/American+Wheel+Corporation/@41.7720715,-87.7707533,15z/data=!4m6!3m5!1s0x880e30d22b458675:0x93e30c1dd89c172f!8m2!3d41.7720715!4d-87.7707533!16s%2Fq%2F1263mdfzv?entry=ttu&q_ep=EgoyMDI0MDkwNC4wIKXMDSOASAFQAw%3D%3D, retrieved September 10, 2024; Area Development, <https://www.areadevelopment.com/newsitems/6-7-2019/indiana-wheel-corporation-plymouth-indiana.shtml>, retrieved September 10, 2024; WSTB, <https://wsbt.com/news/local/indiana-wheel-company-anticipates-yearlong-break>, retrieved September 10, 2024; *** purchaser questionnaire response, sections 1 and 2; Domestic interested party's response to the notice of institution, September 3, 2024, exh. 13; The Greenwood Commonwealth, <https://www.gwcommonwealth.com/local-content-top-stories/saylor-already-lining-customers>, retrieved September 10, 2024; Domestic interested party's response to the notice of institution, September 3, 2024, exh. 2 and exh. 4; Tire Business, <https://www.tirebusiness.com/news/saylor-wheels-set-start-producing-wheel-tire-assemblies-us>, retrieved October 22, 2024.

U.S. producers' trade and financial data

The Commission asked domestic interested parties to provide trade and financial data in their response to the notice of institution in the current five-year reviews. Table I-4 presents a compilation of the trade and financial data submitted from certain responding U.S. producers in the original investigations and subsequent five-year reviews.

Table I-4
Trailer wheels: Trade and financial data submitted by U.S. producers, by period

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; ratio in percent

Item	Measure	2016	2017	2018	2023
Capacity	Quantity	***	***	***	***
Production	Quantity	***	***	***	***
Capacity utilization	Ratio	***	***	***	***
U.S. shipments	Quantity	***	***	***	***
U.S. shipments	Value	***	***	***	***
U.S. shipments	Unit value	***	***	***	***
Net sales	Value	***	***	***	***
COGS	Value	***	***	***	***
COGS to net sales	Ratio	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***
SG&A expenses	Value	***	***	***	***
Operating income or (loss)	Value	***	***	***	***
Operating income or (loss) to net sales	Ratio	***	***	***	***

Source: For the years 2016-18, data are compiled using data submitted in the Commission's original investigations. For the year 2023, data are compiled using data submitted by the domestic interested party. Domestic interested party's response to the notice of institution, exh. 1.

Note: For a discussion of data coverage, please see "U.S. producers" section.

Note: In the original investigations, the Commission excluded a certain U.S. producer that was a related party from the domestic industry. The trade and financial data for this producer are excluded from the data presented for 2016 to 2018.

Definitions of the domestic like product and domestic industry

The domestic like product is defined as the domestically produced product or products which are like, or in the absence of like, most similar in characteristics and uses with, the subject merchandise. The domestic industry is defined as the U.S. producers as a whole of the domestic like product, or those producers whose collective output of the domestic like product constitutes a major proportion of the total domestic production of the product. Under the related parties provision, the Commission may exclude a U.S. producer from the domestic industry for purposes of its injury determination if “appropriate circumstances” exist.²⁸

In its original determinations, the Commission defines the domestic like product as consisting of steel trailer wheels and rims for towable mobile homes, coextensive with the scope. In its original determinations, the Commission defined the domestic industry to include all U.S. producers of steel trailer wheels, except the Carlstar Group LLC.²⁹

U.S. importers

During the final phase of the original investigations, the Commission received U.S. importer questionnaires from 17 firms, which accounted for more than 100 percent of total U.S. imports of trailer wheels from China during 2018.³⁰ Import data presented in the original investigations were based on questionnaire responses.

Although the Commission did not receive responses from any respondent interested parties in these current reviews, in its response to the Commission’s notice of institution, the domestic interested party provided a list of 21 potential U.S. importers of trailer wheels.³¹

²⁸ Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).

²⁹ 89 FR 62783, August 1, 2024.

³⁰ Original publication, pp. IV-1-IV-2.

³¹ Domestic interested party’s response to the notice of institution, September 3, 2024, exh. 1.

U.S. imports

Table I-5 presents the quantity, value, and unit value of U.S. imports from China as well as the other top sources of U.S. imports (shown in descending order of 2023 imports by quantity). Certain out-of-scope chrome coated wheels may also be included.³²

Table I-5
Trailer wheels U.S. imports, by source and period

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound

U.S. imports from	Measure	2019	2020	2021	2022	2023
China	Quantity	20,941	2,534	3,829	4,149	1,828
India	Quantity	2,686	15,389	52,474	18,320	29,412
Korea	Quantity	50,542	43,581	66,444	34,251	27,964
Vietnam	Quantity	20,778	23,121	38,320	28,283	13,077
All other sources	Quantity	26,123	25,606	36,256	34,188	9,692
Nonsubject sources	Quantity	100,129	107,696	193,494	115,041	80,146
All import sources	Quantity	121,070	110,230	197,323	119,190	81,973
China	Value	19,605	3,467	7,222	7,664	3,403
India	Value	1,971	11,029	55,623	24,736	26,308
Korea	Value	44,790	41,253	78,873	45,189	33,787
Vietnam	Value	17,256	19,179	38,348	34,649	13,161
All other sources	Value	23,770	22,447	34,396	43,737	9,497
Nonsubject sources	Value	87,787	93,908	207,240	148,311	82,753
All import sources	Value	107,393	97,374	214,463	155,975	86,155
China	Unit value	0.94	1.37	1.89	1.85	1.86
India	Unit value	0.73	0.72	1.06	1.35	0.89
Korea	Unit value	0.89	0.95	1.19	1.32	1.21
Vietnam	Unit value	0.83	0.83	1.00	1.23	1.01
All other sources	Unit value	0.91	0.88	0.95	1.28	0.98
Nonsubject sources	Unit value	0.88	0.87	1.07	1.29	1.03
All import sources	Unit value	0.89	0.88	1.09	1.31	1.05

Source: Compiled from official Commerce statistics for HTS statistical reporting number 8716.90.5035, accessed September 26, 2024.

Note: Because of rounding, figure may not add to total shown.

³² Original publication, p. I-4.

Apparent U.S. consumption and market shares

Table I-6 presents data on U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares.

Table I-6
Trailer wheels: Apparent U.S. consumption and market shares, by source and period

Quantity in 1,000 pounds; value in 1,000 dollars; shares in percent

Source	Measure	2016	2017	2018	2023
U.S. producers	Quantity	***	***	***	***
China	Quantity	104,488	123,566	129,793	1,828
Nonsubject sources	Quantity	***	***	***	80,146
All import sources	Quantity	***	***	***	81,973
Apparent U.S. consumption	Quantity	***	***	***	***
U.S. producers	Value	***	***	***	***
China	Value	76,928	89,038	94,368	3,403
Nonsubject sources	Value	***	***	***	82,753
All import sources	Value	***	***	***	86,155
Apparent U.S. consumption	Value	***	***	***	***
U.S. producers	Share of quantity	***	***	***	***
China	Share of quantity	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***
All import sources	Share of quantity	***	***	***	***
U.S. producers	Share of value	***	***	***	***
China	Share of value	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***
All import sources	Share of value	***	***	***	***

Source: For the years 2016-18, data are compiled using data submitted in the Commission's original investigations. For the year 2023, U.S. producers' U.S. shipments are compiled from the domestic interested party's response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics under HTS statistical reporting number 8716.90.5035, accessed September 26, 2024.

Note: Share of quantity is the share of apparent U.S. consumption by quantity in percent; share of value is the share of apparent U.S. consumption by value in percent.

Note: For 2016-2018, apparent U.S. consumption is derived from U.S. shipments of imports, rather than U.S. imports.

Note: For a discussion of data coverage, please see "U.S. producers" and "U.S. importers" sections.

The industry in China

Producers in China

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from four firms, which accounted for approximately *** percent of production of trailer wheels in China during 2018, and approximately *** percent of trailer wheels exports from China to the United States during 2018.³³

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested party provided a list of 39 possible producers of trailer wheels in China.³⁴

Recent developments

There were no major developments in the Chinese industry since the imposition of the orders identified by interested parties in the proceeding and no relevant information from outside sources was found.

³³ Original confidential report, p. VII-3.

³⁴ Domestic interested party's response to the notice of institution, September 3, 2024, exh. 1.

Exports

Table I-7 presents export data for parts of trailers, semi-trailers, and other vehicles (not mechanically propelled), a category that includes steel trailer wheels and out-of-scope products, from China (by export destination in descending order of value for 2023).

Table I-7
Trailer parts: Value of exports from China, by destination and period

Value in 1,000 dollars

Destination market	2019	2020	2021	2022	2023
United States	505,932	420,378	623,711	701,496	587,087
Germany	106,904	101,254	163,187	148,431	128,921
Australia	67,696	75,747	121,692	125,661	126,220
Russia	56,527	71,199	83,711	78,190	110,856
Mexico	39,949	36,785	64,300	105,868	105,606
Canada	31,346	28,310	69,100	94,945	72,858
Netherlands	74,345	71,670	88,654	87,438	72,231
United Kingdom	53,576	53,448	71,071	61,726	64,166
Japan	49,725	37,177	58,336	64,826	52,562
South Korea	49,342	47,287	60,997	51,099	41,908
All other markets	517,758	507,557	733,133	732,513	693,526
All markets	1,553,099	1,450,812	2,137,891	2,252,192	2,055,942

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 8716.90, accessed August 19, 2024. These data may be overstated as HS subheading 8716.90 may contain products outside the scope of these reviews.

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

Third-country trade actions

On February 15, 2019, the European Union (EU) initiated an antidumping investigation on imports into the EU of steel road wheels originating from China. Following the investigation, effective March 4, 2020, the EU announced the imposition of an antidumping duty on imports of steel road wheels originating from China, with applicable rates ranging from 50.3 to 66.4 percent.³⁵ The duty covers all steel road wheels designed for road tractors, motor vehicles for the transport of persons and/or goods, special purpose vehicles (such as fire fighting vehicles), and trailers or semi-trailers not mechanically propelled that can be attached to the above vehicles. Products expressly excluded were steel road wheels for industrial assembly of pedestrian controlled tractors, wheels for quad bikes, wheel centers in star form that are cast from one piece of steel, wheels for motor vehicles specifically designed for uses other than on public roads, wheels for passenger car trailers and caravans, not mechanically propelled, with a rim diameter of not more than 16 inches, and wheel for trailers or semi-trailers designed for uses other than on public roads. The duty is in effect for five years.

Flat base steel wheels originating from China are subject to an anti-dumping duty of \$613 per MT in India.³⁶ Subject wheels are of nominal diameter between 16" and 20" for use in commercial vehicles (buses, lorries including trucks, trailers, tempos, etc.) and are classified under sub-heading 8708.70 of the HS classification. The original investigation was concluded in November 2007 and the orders are still in effect as of June 13, 2023, following a third sunset review.

³⁵ Office Journal of the European Union, L 65/9, March 4, 2020.

³⁶ F. No. 7/02/2023-DGTR, June 12, 2023

The global market

Table I-8 presents global export data for Parts of trailers, semi-trailers, and other vehicles (not mechanically propelled), a category that includes steel trailer wheels and out-of-scope products, (by source in descending order of value for 2023).

Table I-8
Trailer parts: Value of global exports by country and period

Value in 1,000 dollars

Exporting country	2019	2020	2021	2022	2023
Germany	1,928,191	1,821,059	2,384,884	2,113,493	2,088,506
China	1,553,099	1,450,812	2,137,891	2,252,192	2,055,942
United States	943,563	714,101	1,075,350	1,513,382	1,692,516
Netherlands	462,711	425,283	510,164	579,872	824,171
Poland	414,657	398,867	573,737	573,848	552,425
Hungary	383,832	376,037	493,837	429,787	441,213
Italy	338,401	325,852	430,175	404,400	391,984
France	183,962	158,493	243,029	229,017	262,646
Turkey	107,331	91,212	137,905	171,034	259,892
Canada	165,457	127,872	184,222	215,065	220,697
All other exporters	1,990,143	1,853,205	2,430,459	2,371,497	2,255,451
All exporters	8,471,347	7,742,794	10,601,654	10,853,586	11,045,442

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 8716.90, accessed August 19, 2024. These data may be overstated as HS subheadings 8716.90 may contain products outside the scope of these reviews.

Note: Quantity data are not presented as there is no consistent unit used across reporting countries.

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

APPENDIX A
FEDERAL REGISTER NOTICES

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

Citation	Title	Link
89 FR 62783 August 1, 2024	Steel Trailer Wheels From China; Institution of Five-Year Reviews	https://www.govinfo.gov/content/pkg/FR-2024-08-01/pdf/2024-16632.pdf
89 FR 62717 August 1, 2024	Initiation of Five-Year (Sunset) Reviews	https://www.govinfo.gov/content/pkg/FR-2024-08-01/pdf/2024-16988.pdf

APPENDIX B
RESPONSES TO THE NOTICE OF INSTITUTION

Responses to the Commission’s notice of institution

Individual responses

The Commission received one submission in response to its notice of institution in the subject reviews. It was filed on behalf of the following entities:

1. Dexstar Wheel Division of Americana Development, Inc. (“Dexstar”), domestic producer of trailer wheels (referred to herein as “domestic interested party”)

A complete response to the Commission’s notice of institution requires that the responding interested party submit to the Commission all the information listed in the notice. Responding firms are given an opportunity to remedy or explain deficiencies in their responses and to provide clarifying details where appropriate. A summary of the number of responses and estimates of coverage for each is shown in table B-1.

Table B-1

Trailer wheels: Summary of responses to the Commission's notice of institution

Interested party type	Number	Coverage
U.S. producer	1	***

Note: The U.S. producer coverage figure presented is the domestic interested party's estimate of its share of total U.S. production of trailer wheels during 2023. Domestic interested party's response to the notice of institution, September 3, 2024, exh. 1.

Party comments on adequacy

The Commission did not receive party comments on the adequacy of responses to the notice of institution and whether the Commission should conduct expedited or full reviews.

Company-specific information

Table B-2

Trailer wheels: Response checklist for U.S. producers

Yes = provided response; no = did not provide a response; NA = not available; not known = information was not known

Item	Dexstar
Nature of operation	Yes
Statement of intent to participate	Yes
Statement of likely effects of revoking the order	Yes
U.S. producer list	Yes
U.S. importer/foreign producer list	Yes
List of 3-5 leading purchasers	Yes
List of sources for national/regional prices	Not known
Trade/financial data	Yes
Changes in supply/demand	Yes
Complete response	Yes

APPENDIX C
SUMMARY DATA COMPILED IN PRIOR PROCEEDINGS

Table C-1: Trailer wheels: Summary data concerning the total U.S. market C-4
Table C-2: Trailer wheels: Summary data concerning the merchant U.S. market C-6
Table C-3: Trailer wheels: Data concerning the total U.S. market (company excluded)..... C-8
Table C-4: Trailer wheels: Data concerning the merchant U.S. market (company excluded) ..C-10

Total market

Table C-1

Trailer wheels: Summary data concerning the U.S. market, 2016-18, January to March 2018, and January to March 2019

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

	Reported data					Period changes			
	Calendar year			January to March		Calendar year			Jan-Mar
	2016	2017	2018	2018	2019	2016-18	2016-17	2017-18	2018-19
U.S. total market consumption quantity:									
Amount.....	***	***	***	***	***	***	***	***	***
Producers' share (fn1).....	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
China.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
All import sources.....	***	***	***	***	***	***	***	***	***
U.S. total market consumption value:									
Amount.....	***	***	***	***	***	***	***	***	***
Producers' share (fn1).....	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
China.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
All import sources.....	***	***	***	***	***	***	***	***	***
U.S. importers' U.S. shipments of imports from:									
China:									
Quantity.....	104,488	123,566	129,793	35,042	30,892	24.2	18.3	5.0	(11.8)
Value.....	76,928	89,038	94,368	26,101	22,812	22.7	15.7	6.0	(12.6)
Unit value.....	\$ 0.74	\$ 0.72	\$ 0.73	\$ 0.74	\$ 0.74	(1.2)	(2.1)	0.9	(0.9)
Ending inventory quantity.....	33,875	36,584	48,020	35,153	32,231	41.8	8.0	31.3	(8.3)
Nonsubject sources:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
All import sources:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
U.S. producers':									
Average capacity quantity.....	***	***	***	***	***	***	***	***	***
Production quantity.....	***	***	***	***	***	***	***	***	***
Capacity utilization (fn1).....	***	***	***	***	***	***	***	***	***
U.S. shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Export shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Inventories/total shipments (fn1).....	***	***	***	***	***	***	***	***	***
Production workers.....	***	***	***	***	***	***	***	***	***
Hours worked (1,000s).....	***	***	***	***	***	***	***	***	***
Wages paid (\$1,000).....	***	***	***	***	***	***	***	***	***
Hourly wages (dollars per hour).....	***	***	***	***	***	***	***	***	***
Productivity (pounds per hour).....	***	***	***	***	***	***	***	***	***
Unit labor costs.....	***	***	***	***	***	***	***	***	***

Table continued on next page.

Table C-1--Continued

Trailer wheels: Summary data concerning the U.S. market, 2016-18, January to March 2018, and January to March 2019

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

	Reported data					Period changes			
	Calendar year			January to March		Calendar year			Jan-Mar
	2016	2017	2018	2018	2019	2016-18	2016-17	2017-18	2018-19
U.S. producers':									
Net sales:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Cost of goods sold (COGS).....	***	***	***	***	***	***	***	***	***
Gross profit or (loss).....	***	***	***	***	***	***	***	***	***
SG&A expenses.....	***	***	***	***	***	***	***	***	***
Operating income or (loss).....	***	***	***	***	***	***	***	***	***
Net income or (loss).....	***	***	***	***	***	***	***	***	***
Capital expenditures.....	***	***	***	***	***	***	***	***	***
Unit COGS.....	***	***	***	***	***	***	***	***	***
Unit SG&A expenses.....	***	***	***	***	***	***	***	***	***
Unit operating income or (loss).....	***	***	***	***	***	***	***	***	***
Unit net income or (loss).....	***	***	***	***	***	***	***	***	***
COGS/sales (fn1).....	***	***	***	***	***	***	***	***	***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***	***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***	***

Notes:

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

fn2.--Undefined.

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

Merchant market

Table C-2

Trailer wheels: Summary data concerning the U.S. merchant market, 2016-18, January to March 2018, and January to March 2019

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

	Reported data					Period changes			
	Calendar year			January to March		Calendar year			Jan-Mar
	2016	2017	2018	2018	2019	2016-18	2016-17	2017-18	2018-19
U.S. merchant market consumption quantity:									
Amount.....	***	***	***	***	***	***	***	***	***
Producers' share (fn1).....	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
China.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
All import sources.....	***	***	***	***	***	***	***	***	***
U.S. merchant market consumption value:									
Amount.....	***	***	***	***	***	***	***	***	***
Producers' share (fn1).....	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
China.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
All import sources.....	***	***	***	***	***	***	***	***	***
U.S. importers' U.S. shipments of imports from:									
China:									
Quantity.....	104,488	123,566	129,793	35,042	30,892	24.2	18.3	5.0	(11.8)
Value.....	76,928	89,038	94,368	26,101	22,812	22.7	15.7	6.0	(12.6)
Unit value.....	\$ 0.74	\$ 0.72	\$ 0.73	\$ 0.74	\$ 0.74	(1.2)	(2.1)	0.9	(0.9)
Ending inventory quantity.....	33,875	36,584	48,020	35,153	32,231	41.8	8.0	31.3	(8.3)
Nonsubject sources:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
All import sources:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***

Table continued on next page.

Table C-2--Continued

Trailer wheels: Summary data concerning the U.S. merchant market, 2016-18, January to March 2018, and January to March 2019

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

	Reported data					Period changes			
	Calendar year			January to March		Calendar year			Jan-Mar
	2016	2017	2018	2018	2019	2016-18	2016-17	2017-18	2018-19
U.S. producers':									
Commercial U.S. shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Commercial sales:	***	***	***	***	***	***	***	***	***
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Cost of goods sold (COGS).....	***	***	***	***	***	***	***	***	***
Gross profit or (loss).....	***	***	***	***	***	***	***	***	***
SG&A expenses.....	***	***	***	***	***	***	***	***	***
Operating income or (loss).....	***	***	***	***	***	***	***	***	***
Net income or (loss).....	***	***	***	***	***	***	***	***	***
Unit COGS.....	***	***	***	***	***	***	***	***	***
Unit SG&A expenses.....	***	***	***	***	***	***	***	***	***
Unit operating income or (loss).....	***	***	***	***	***	***	***	***	***
Unit net income or (loss).....	***	***	***	***	***	***	***	***	***
COGS/sales (fn1).....	***	***	***	***	***	***	***	***	***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***	***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***	***

Notes:

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

fn2.--Undefined.

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

Related party exclusion: Total market

Table C-3

Trailer wheels: Summary data concerning the U.S. total market excluding one related party (*) , 2016-18, January to March 2018, and January to March 2019**

(Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent—exceptions noted)

	Reported data					Period changes			
	Calendar year		2018	January to March		Calendar year			Jan-Mar 2018-19
	2016	2017		2018	2018	2019	2016-18	2016-17	
U.S. total market consumption quantity:									
Amount.....	***	***	***	***	***	***	***	***	***
Producers' share (fn1):									
Included producers'.....	***	***	***	***	***	***	***	***	***
Excluded producers'.....	***	***	***	***	***	***	***	***	***
All US producers'.....	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
China.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
All import sources.....	***	***	***	***	***	***	***	***	***
U.S. total market consumption value:									
Amount.....	***	***	***	***	***	***	***	***	***
Producers' share (fn1):									
Included producers'.....	***	***	***	***	***	***	***	***	***
Excluded producers'.....	***	***	***	***	***	***	***	***	***
All US producers'.....	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
China.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
All import sources.....	***	***	***	***	***	***	***	***	***
U.S. importers' U.S. shipments of imports from:									
China:									
Quantity.....	104,488	123,566	129,793	35,042	30,892	24.2	18.3	5.0	(11.8)
Value.....	76,928	89,038	94,368	26,101	22,812	22.7	15.7	6.0	(12.6)
Unit value.....	\$0.74	\$0.72	\$0.73	\$0.74	\$0.74	(1.2)	(2.1)	0.9	(0.9)
Ending inventory quantity.....	33,875	36,584	48,020	35,153	32,231	41.8	8.0	31.3	(8.3)
Nonsubject sources:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
All import sources:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Included U.S. producers':									
Average capacity quantity.....	***	***	***	***	***	***	***	***	***
Production quantity.....	***	***	***	***	***	***	***	***	***
Capacity utilization (fn1).....	***	***	***	***	***	***	***	***	***
U.S. shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Export shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Inventories/total shipments (fn1).....	***	***	***	***	***	***	***	***	***
Production workers.....	***	***	***	***	***	***	***	***	***
Hours worked (1,000s).....	***	***	***	***	***	***	***	***	***
Wages paid (\$1,000).....	***	***	***	***	***	***	***	***	***
Hourly wages (dollars per hour).....	***	***	***	***	***	***	***	***	***
Productivity (pounds per hour).....	***	***	***	***	***	***	***	***	***
Unit labor costs.....	***	***	***	***	***	***	***	***	***

Table continued on next page.

Table C-3--Continued

Trailer wheels: Summary data concerning the U.S. total market excluding one related party (*) , 2016-18, January to March 2018, and January to March 2019**

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

	Reported data					Period changes			
	Calendar year			January to March		Calendar year			Jan-Mar
	2016	2017	2018	2018	2019	2016-18	2016-17	2017-18	2018-19
Included U.S. producers':									
Net sales:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Cost of goods sold (COGS).....	***	***	***	***	***	***	***	***	***
Gross profit or (loss).....	***	***	***	***	***	***	***	***	***
SG&A expenses.....	***	***	***	***	***	***	***	***	***
Operating income or (loss).....	***	***	***	***	***	***	***	***	***
Net income or (loss).....	***	***	***	***	***	***	***	***	***
Capital expenditures.....	***	***	***	***	***	***	***	***	***
Unit COGS.....	***	***	***	***	***	***	***	***	***
Unit SG&A expenses.....	***	***	***	***	***	***	***	***	***
Unit operating income or (loss).....	***	***	***	***	***	***	***	***	***
Unit net income or (loss).....	***	***	***	***	***	***	***	***	***
COGS/sales (fn1).....	***	***	***	***	***	***	***	***	***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***	***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***	***

Notes:

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

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

Related party exclusion: Merchant market

Table C-4

Trailer wheels: Summary data concerning the U.S. merchant market excluding one related party (*)**, 2016-18, January to March 2018, and January to March 2019

(Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent—exceptions noted)

	Reported data					Period changes			
	Calendar year			January to March		Calendar year			Jan-Mar
	2016	2017	2018	2018	2019	2016-18	2016-17	2017-18	2018-19
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	***	***	***	***
Producers' share (fn1):									
Included producers'.....	***	***	***	***	***	***	***	***	***
Excluded producers'.....	***	***	***	***	***	***	***	***	***
All US producers'.....	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
China.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
All import sources.....	***	***	***	***	***	***	***	***	***
U.S. consumption value:									
Amount.....	***	***	***	***	***	***	***	***	***
Producers' share (fn1):									
Included producers'.....	***	***	***	***	***	***	***	***	***
Excluded producers'.....	***	***	***	***	***	***	***	***	***
All US producers'.....	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
China.....	***	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***	***
All import sources.....	***	***	***	***	***	***	***	***	***
U.S. importers' U.S. shipments of imports from:									
China:									
Quantity.....	104,488	123,566	129,793	35,042	30,892	24.2	18.3	5.0	(11.8)
Value.....	76,928	89,038	94,368	26,101	22,812	22.7	15.7	6.0	(12.6)
Unit value.....	\$0.74	\$0.72	\$0.73	\$0.74	\$0.74	(1.2)	(2.1)	0.9	(0.9)
Ending inventory quantity.....	33,875	36,584	48,020	35,153	32,231	41.8	8.0	31.3	(8.3)
Nonsubject sources:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
All import sources:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Included U.S. producers':									
Commercial U.S. shipments:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***

Table C-4--Continued

Trailer wheels: Summary data concerning the U.S. merchant market excluding one related party (*) , 2016-18, January to March 2018, and January to March 2019**

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

	Reported data					Period changes			
	Calendar year			January to March		Calendar year			Jan-Mar
	2016	2017	2018	2018	2019	2016-18	2016-17	2017-18	2018-19
Included U.S. producers:									
Commercial sales:									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Cost of goods sold (COGS).....	***	***	***	***	***	***	***	***	***
Gross profit or (loss).....	***	***	***	***	***	***	***	***	***
SG&A expenses.....	***	***	***	***	***	***	***	***	***
Operating income or (loss).....	***	***	***	***	***	***	***	***	***
Net income or (loss).....	***	***	***	***	***	***	***	***	***
Unit COGS.....	***	***	***	***	***	***	***	***	***
Unit SG&A expenses.....	***	***	***	***	***	***	***	***	***
Unit operating income or (loss).....	***	***	***	***	***	***	***	***	***
Unit net income or (loss).....	***	***	***	***	***	***	***	***	***
COGS/sales (fn1).....	***	***	***	***	***	***	***	***	***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***	***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	***	***	***	***

Notes:

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

fn2.--Undefined.

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

APPENDIX D
PURCHASER QUESTIONNAIRE RESPONSES

As part of their response to the notice of institution, interested parties were asked to provide a list of three to five leading purchasers in the U.S. market for the domestic like product. A response was received from domestic interested parties and it provided contact information for the following five firms as top purchasers of steel trailer wheels: ***. Purchaser questionnaires were sent to these five firms and two firms *** provided responses, which are presented below.

1. Have there been any significant changes in the supply and demand conditions for steel trailer wheels that have occurred in the United States or in the market for steel trailer wheels in China since September 3, 2019?

Purchaser	Yes / No	Changes that have occurred
***	***	***
***	***	***

2. Do you anticipate any significant changes in the supply and demand conditions for steel trailer wheels in the United States or in the market for steel trailer wheels in China within a reasonably foreseeable time?

Purchaser	Yes / No	Anticipated changes
***	***	***
***	***	***

