Carbon and Alloy Steel Cut-to-Length Plate from Brazil, South Africa, and Turkey

Investigation Nos. 731-TA-1319, 1326, and 1328 (Final)

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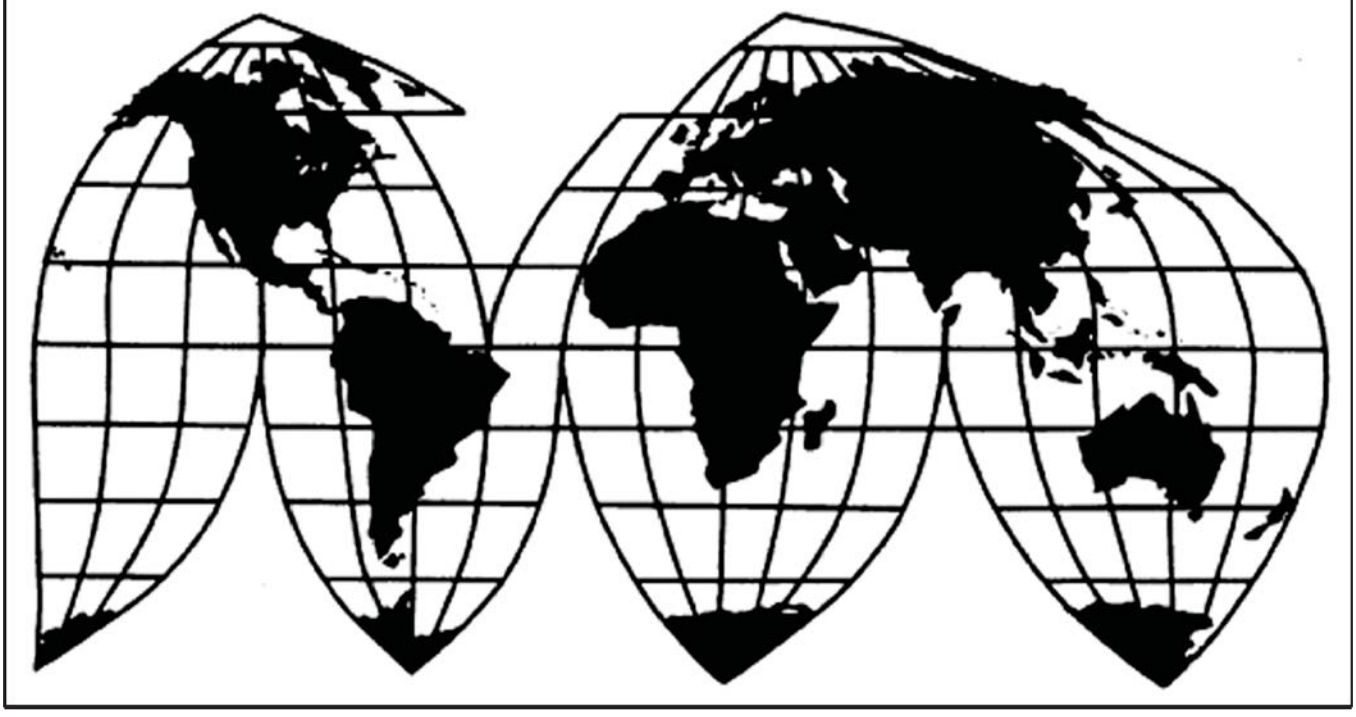
U.S. International Trade Commission



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Note.--Information that would reveal confidential operations of individual concerns may not be published and therefore has been deleted. Such deletions are indicated by asterisks.

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 731-TA-1319, 1326, and 1328 (Final)
Carbon and Alloy Steel Cut-to-Length Plate from Brazil, South Africa, and Turkey

DETERMINATION

On the basis of the record[1] developed in the subject investigations, the United States International Trade Commission ("Commission") determines, pursuant to the Tariff Act of 1930 ("the Act"), that an industry in the United States is materially injured by reason of imports of carbon and alloy steel cut-to-length plate from Brazil, South Africa, and Turkey, provided for in subheadings 7208.40.30, 7208.51.00, 7208.52.00, 7211.13.00, 7211.14.00, 7225.40.11, 7225.40.30, 7226.20.00, and 7226.91.50 of the Harmonized Tariff Schedule of the United States, that have been found by the Department of Commerce ("Commerce") to be sold in the United States at less than fair value ("LTFV"). The Commission also finds that imports subject to Commerce's affirmative critical circumstances determinations are not likely to undermine seriously the remedial effect of the antidumping duty orders on carbon and alloy steel cut-to-length plate from Brazil and Turkey.

BACKGROUND

The Commission, pursuant to section 735(b) of the Act (19 U.S.C. 1673d(b)), instituted these investigations effective April 8, 2016, following receipt of petitions filed with the Commission and Commerce by ArcelorMittal USA LLC (Chicago, Illinois), Nucor Corporation (Charlotte, North Carolina), and SSAB Enterprises, LLC (Lisle, Illinois). The Commission scheduled the final phase of the investigations following notification of preliminary determinations by Commerce that imports of cut-to-length plate from Brazil, South Africa, and Turkey were being sold at LTFV within the meaning of section 733(b) of the Act (19 U.S.C. 1673b(b)). Notice of the scheduling of the final phase of the Commission's investigations and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* of October 12, 2016 (81 FR 70440). The hearing was held in Washington, DC, on November 30, 2016, and all persons who requested the opportunity were permitted to appear in person or by counsel.

[1] The record is defined in sec. 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 the final phase of these investigations, we determine that an industry in the United States is materially injured by reason of imports of certain carbon and alloy steel cut-to-length plate ("CTL plate") from Brazil, South Africa, and Turkey found by the U.S. Department of Commerce ("Commerce") to be sold in the United States at less than fair value. We also find that critical circumstances do not exist with respect to the imports from Brazil and Turkey for which Commerce made affirmative critical circumstances determinations.

I. Background

The petitions in these investigations were filed on April 8, 2016 by ArcelorMittal USA LLC ("AMUSA"), Nucor Corporation ("Nucor"), and SSAB Enterprises, LLC ("SSAB").[1] Each of these firms is a domestic producer of CTL plate. Representatives of these firms appeared at the hearing accompanied by counsel and submitted prehearing and posthearing briefs. Two other domestic producers, EVRAZ Inc., NA ("EVRAZ") and JSW Steel USA Inc. ("JSW"), also participated in the hearing and submitted briefs.

The following respondents and respondent groups participated actively in the final-phase investigations:

- voestalpine Steel & Service Center GmbH, Bohler Edelstahl GmbH & Co. KG, Bohler Bleche GmbH & Co. KG, voestalpine USA Corp., and Bohler Uddeholm ("voestalpine" or "Austrian Respondents"), Austrian producers and exporters and a U.S. importer of subject merchandise;

- Aktiengesellschaft der Dillinger Hüttenwerke; Dillinger France, S.A.; Dillinger America Inc.; Salzgitter AG; Salzgitter Mannesmann International USA, Inc.; Salzgitter Mannesmann International GmbH; Universal Steel America Inc.; thysenkrupp Steel Europe AG; thysenkrupp Steel North America, Inc.; Berg Steel Pipe Corp.; and Friedr. Lohmann GmbH, German and French producers and exporters and U.S. importers of subject merchandise (collectively "French and German Respondents");

[1] The petitions concerned CTL plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Turkey, and Taiwan. The Commission terminated the countervailing duty investigation concerning subject imports from Brazil based on a finding of negligible imports. *Certain Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey*, Inv. Nos. 701-TA-559-561, 731-TA-1317-1328 (Preliminary), USITC Pub. 4615 at 3 (May 2016) ("*Preliminary Determinations*"). Commerce has not yet published its final determinations in its investigations of CTL plate from Austria, Belgium, China, France, Germany, Italy, Japan, Korea, and Taiwan. The briefing and hearing described below addressed the Commission's final-phase investigations with respect to all twelve subject countries.

- JFE Steel Corporation, Tokyo Steel Manufacturing Co., Nippon Steel & Sumitomo Metal Corporation, Kobe Steel Ltd. (collectively "Japanese Respondents"), Japanese producers and exporters of subject merchandise;

- POSCO, a producer and exporter of subject merchandise in Korea;

- China Steel Corporation, a producer and exporter of subject merchandise in Taiwan;

- Ereğli Demir ve Celik Fabrikalari T.A.Ş ("Erdemir" or "Turkish Respondent"), a producer and exporter of subject merchandise in Turkey; and

- Hitachi Metals, Ltd., a producer and exporter of the subject merchandise in Japan, and Hitachi Metals America LLC, an importer of the subject merchandise, along with Austrian Respondents and German and French Respondents ("Tool Steel Respondents").

In addition, two importers of CTL plate, Stemcor USA Inc. ("Stemcor") and The KnifeSource LLC ("KnifeSource"), participated in the hearing and submitted briefs.

U.S. industry data are based on the questionnaire responses from 21 domestic producers that are believed to account for a substantial majority of domestic production of CTL plate in 2015.[2] U.S. import data are based on official Commerce import statistics as adjusted, based on importer questionnaire responses, to exclude forms of CTL plate that are excluded from the scope of these investigations.[3] The Commission received usable responses to its questionnaires from 35 producers/exporters of subject merchandise.[4]

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[2] Confidential Report (INV-OO-119, December 19, 2016)("CR") at III-1, Public Report (USITC Pub. 4664, January 2017)("PR") at III-1.

[3] CR/PR at IV-1 and n.3. Usable importer questionnaire responses were received from 93 companies, representing virtually all U.S. imports from Austria, Belgium, France, Germany, Japan, and South Africa; 86.8 percent of U.S. imports from Brazil; 37.8 percent of U.S. imports from China; 89.0 percent of U.S. imports from Italy; all U.S. imports from Korea subject to investigation; 94.6 percent of U.S. imports from Taiwan; 62.9 percent of U.S. imports from Turkey; and 67.1 percent of U.S. imports from nonsubject sources during 2015. CR at I-10-11, PR at I-7.

[4] Responses were received from: three firms believed to account for *** production of CTL plate in Austria in 2015 (CR at VII-3, PR at VII-3), two firms believed to account for *** of production of CTL plate in Belgium in 2015 (CR at VII-11, PR at VII-7), three firms believed to account for *** production of CTL plate in Brazil in 2015 (CR at VII-18, PR at VII-11), one firm believed to account for *** percent of production of CTL plate in China in 2015 (CR at VII-26, PR at VII-15), three firms believed to account for *** percent of production of CTL plate in France in 2015 (CR at VII-33, PR at VII-19), six firms believed to account for *** of production of CTL plate in Germany in 2015 (CR at VII-40, PR at VII-23), four firms believed to account for *** percent of production of CTL plate in Italy in 2015 (CR at VII-49, PR at VII-28), six firms believed to account for *** production of CTL plate in Japan in 2015 (CR at VII-57, PR at VII-33), one firm believed to account for *** percent of production of CTL plate in Korea in 2015 (CR (Continued...)

II. Domestic Like Product

A. In General

In determining whether an industry in the United States is materially injured or threatened with material injury by reason of imports of subject merchandise, the Commission first defines the "domestic like product" and the "industry."[5] Section 771(4)(A) of the Tariff Act of 1930, as amended ("the Tariff Act"), defines the relevant domestic industry as the "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."[6] In turn, the Tariff Act defines "domestic like product" as "a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation."[7]

The decision regarding the appropriate domestic like product in an investigation is a factual determination, and the Commission has applied the statutory standard of "like" or "most similar in characteristics and uses" on a case-by-case basis.[8] No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.[9] The Commission looks for clear dividing lines among possible like products and disregards minor variations.[10] Although the Commission must accept

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(…Continued)
at VII-65, PR at VII-38), two firms believed to account for *** production of CTL plate in South Africa in 2015 (CR at VII-72, PR at VII-42), three firms believed to account for *** production of CTL plate in Taiwan in 2015 (CR at VII-80, PR at VII-46), and one firm believed to account for *** of production of CTL plate in Turkey in 2015 (CR at VII-87, PR at VII-50).

[5] 19 U.S.C. § 1677(4)(A).

[6] 19 U.S.C. § 1677(4)(A).

[7] 19 U.S.C. § 1677(10).

[8] See, e.g., Cleo Inc. v. United States, 501 F.3d 1291, 1299 (Fed. Cir. 2007); NEC Corp. v. Department of Commerce, 36 F. Supp. 2d 380, 383 (Ct. Int'l Trade 1998); Nippon Steel Corp. v. United States, 19 CIT 450, 455 (1995); Torrington Co. v. United States, 747 F. Supp. 744, 749 n.3 (Ct. Int'l Trade 1990), aff'd, 938 F.2d 1278 (Fed. Cir. 1991) ("every like product determination 'must be made on the particular record at issue' and the 'unique facts of each case'"). The Commission generally considers a number of factors, including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. See Nippon, 19 CIT at 455 n.4; Timken Co. v. United States, 913 F. Supp. 580, 584 (Ct. Int'l Trade 1996).

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

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

Commerce's determination as to the scope of the imported merchandise that is subsidized or sold at less than fair value,[11] the Commission determines what domestic product is like the imported articles Commerce has identified.[12]

B. Product Description

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

Certain carbon and alloy steel hot-rolled or forged flat plate products not in coils, whether or not painted, varnished, or coated with plastics or other non-metallic substances (cut-to-length plate). Subject merchandise includes plate that is produced by being cut-to-length from coils or from other discrete length plate and plate that is rolled or forged into a discrete length. The products covered include (1) Universal mill plates (i.e., flat-rolled products rolled on four faces or in a closed box pass, of a width exceeding 150 mm but not exceeding 1250 mm, and of a thickness of not less than 4 mm, which are not in coils and without patterns in relief), and (2) hot-rolled or forged flat steel products of a thickness of 4.75 mm or more and of a width which exceeds 150 mm and measures at least twice the thickness, and which are not in coils, whether or not with patterns in relief. The covered products described above may be rectangular, square, circular or other shapes and include products of either rectangular or non-rectangular cross-section where such non-rectangular cross-section is achieved subsequent to the rolling process, i.e., products which have been ''worked after rolling'', (e.g., products which have been beveled or rounded at the edges).

For purposes of the width and thickness requirements referenced above, the following rules apply:

(1) except where otherwise stated where the nominal and actual thickness or width measurements vary, a product from a given subject country is within the scope if application of either the nominal or actual measurement would place it within the scope based on the definitions set forth above unless the product is already covered by an order existing on that specific country (e.g., orders on hot-rolled flat-rolled steel); and

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[11] *See*, *e.g., USEC, Inc. v. United States*, 34 Fed. Appx. 725, 730 (Fed. Cir. 2002) ("The ITC may not modify the class or kind of imported merchandise examined by Commerce."); *Algoma Steel Corp. v. United States*, 688 F. Supp. 639, 644 (Ct. Int'l Trade 1988), *aff'd*, 865 F.3d 240 (Fed. Cir.), *cert. denied*, 492 U.S. 919 (1989).

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

(2) where the width and thickness vary for a specific product (e.g., the thickness of certain products with non-rectangular cross-section, the width of certain products with non-rectangular shape, etc.), the measurement at its greatest width or thickness applies.

Steel products included in the scope of these investigations are products in which: (1) iron predominates, by weight, over each of the other contained elements; and (2) the carbon content is 2 percent or less by weight.

Subject merchandise includes cut-to-length plate that has been further processed in the subject country or a third country, including but not limited to pickling, oiling, levelling, annealing, tempering, temper rolling, skin passing, painting, varnishing, trimming, cutting, punching, beveling, and/or slitting, or any other processing that would not otherwise remove the merchandise from the scope of the investigations if performed in the country of manufacture of the cut-to-length plate.

All products that meet the written physical description, are within the scope of these investigations unless specifically excluded or covered by the scope of an existing order. The following products are outside of, and/or specifically excluded from, the scope of these investigations:

(1) products clad, plated, or coated with metal, whether or not painted, varnished or coated with plastic or other non-metallic substances;

(2) military grade armor plate certified to one of the following specifications or to a specification that references and incorporates one of the following specifications:

- MIL-A-12560,
- MIL-DTL-12560H,
- MIL-DTL-12560J,
- MIL- DTL-12560K,
- MIL-DTL-32332,
- MIL-A-46100D,
- MIL-DTL-46100-E,
- MIL-46177C,
- MIL-S-16216K Grade HY80,
- MIL-S-16216K Grade HY100,
- MIL-S-246245A HSLA-80,
- MIL-S-24645A HSLA-100,
- T9074-BD-GIB-010/0300 Grade HY80,
- T9074-BD-GIB-010/0300 Grade HY100,
- T9074-BD-GIB-010/0300 Grade HSLA80,
- T9074-BD-GIB-010/0300 Grade HSLA100, and
- T9074-BD-GIB-010/0300 Mod. Grade HSLA115,

Except that any cut-to-length plate certified to one of the above specifications, or to a military grade armor specification that references and incorporate one of the above specifications, will not be excluded from the scope if it is also dual- or multiple-certified to any other non-armor specification that otherwise would fall within the scope of this order;

(3) stainless steel plate, containing 10.5 percent or more of chromium by weight;

(4) CTL plate meeting the requirements of ASTM A-829, Grade E 4340 that are over 305 mm in actual thickness.

(5) Alloy forged and rolled CTL plate greater than or equal to 152.4 mm in actual thickness meeting each of the following requirements:

(a) Electric Furnace melted, ladle refined & vacuum degassed and having a chemical composition (expressed in weight percentages):

- Carbon 0.23-0.28,
- Silicon 0.05-0.20,
- Manganese 1.20-1.60,
- Nickel not greater than 1.0,
- Sulfur not greater than 0.007,
- Phosphorus not greater than 0.020,
- Chromium 1.0-2.5,
- Molybdenum 0.35-0.8,
- Boron 0.002-0.004,
- Oxygen not greater than 20 ppm,
- Hydrogen not greater than 2 ppm,
- Nitrogen not greater than 60 ppm;

(b) With a Brinell hardness measured in all parts of the product including mid thickness falling within one of the following ranges:

(i) 270-300 HBW,
(ii) 290-320 HBW, or
(iii) 320-350 HBW;

(c) Having cleanliness in accordance with ASTM E45 method A (Thin and Heavy): A not exceeding 1.5, B not exceeding 1.0, C not exceeding 0.5, D not exceeding 1.5; and

(d) Conforming to ASTM A578-S9 ultrasonic testing requirements with acceptance criteria 2 mm flat bottom hole;

(6) Alloy forged and rolled steel CTL plate over 407 mm in actual thickness and meeting the following requirements:

(a) Made from Electric Arc Furnace melted, Ladle refined & vacuum degassed, alloy steel with the following chemical composition (expressed in weight percentages):

- Carbon 0.23-0.28,
- Silicon 0.05-0.15,
- Manganese 1.20-1.50,
- Nickel not greater than 0.4,
- Sulfur not greater than 0.010,
- Phosphorus not greater than 0.020,
- Chromium 1.2-1.5,
- Molybdenum 0.35-0.55,
- Boron 0.002-0.004,
- Oxygen not greater than 20 ppm,
- Hydrogen not greater than 2 ppm, and
- Nitrogen not greater than 60 ppm;

(b) Having cleanliness in accordance with ASTM E45 method A (Thin and Heavy): A not exceeding 1.5, B not exceeding 1.5, C not exceeding 1.0, D not exceeding 1.5;

(c) Having the following mechanical properties:

(i) With a Brinell hardness not more than 237 HBW measured in all parts of the product including mid thickness; and having a Yield Strength of 75ksi min and UTS 95ksi or more, Elongation of 18% or more and Reduction of area 35% or more; having charpy V at -75 degrees F in the longitudinal direction equal or greater than 15 ft. lbs (single value) and equal or greater than 20 ft. lbs (average of 3 specimens) and conforming to the requirements of NACE MR01-75; or

(ii) With a Brinell hardness not less than 240 HBW measured in all parts of the product including mid thickness; and having a Yield Strength of 90 ksi min and UTS 110 ksi or more, Elongation of 15% or more and Reduction of area 30% or more; having charpy V at -40 degrees F in the longitudinal direction equal or greater than 21 ft. lbs (single value) and equal or greater than 31 ft. lbs (average of 3 specimens);

(d) Conforming to ASTM A578-S9 ultrasonic testing requirements with acceptance criteria 3.2 mm flat bottom hole; and

(e) Conforming to magnetic particle inspection in accordance with AMS 2301;

(7) Alloy forged and rolled steel CTL plate over 407 mm in actual thickness and meeting the following requirements:

(a) Made from Electric Arc Furnace melted, ladle refined & vacuum degassed, alloy steel with the following chemical composition (expressed in weight percentages):

- Carbon 0.25-0.30,
- Silicon not greater than 0.25,
- Manganese not greater than 0.50,
- Nickel 3.0-3.5,
- Sulfur not greater than 0.010,
- Phosphorus not greater than 0.020,
- Chromium 1.0-1.5,
- Molybdenum 0.6-0.9,
- Vanadium 0.08 to 0.12
- Boron 0.002-0.004,
- Oxygen not greater than 20 ppm,
- Hydrogen not greater than 2 ppm, and
- Nitrogen not greater than 60 ppm.

(b) Having cleanliness in accordance with ASTM E45 method A (Thin and Heavy): A not exceeding 1.0(t) and 0.5(h), B not exceeding 1.5(t) and 1.0(h), C not exceeding 1.0(t) and 0.5(h), and D not exceeding 1.5(t) and 1.0(h);

(c) Having the following mechanical properties: A Brinell hardness not less than 350 HBW measured in all parts of the product including mid thickness; and having a Yield Strength of 145ksi or more and UTS 160ksi or more, Elongation of 15% or more and Reduction of area 35% or more; having charpy V at -40 degrees F in the transverse direction equal or greater than 20 ft. lbs (single value) and equal or greater than 25 ft. lbs (average of 3 specimens);

(d) Conforming to ASTM A578-S9 ultrasonic testing requirements with acceptance criteria 3.2 mm flat bottom hole; and

(e) Conforming to magnetic particle inspection in accordance with AMS 2301.

Korea AD: At the time of the filing of the petition, there was an existing antidumping duty order on certain cut-to-length carbon-quality steel plate products from Korea. See Notice of Final Determination of Sales at Less Than Fair Value: Certain Cut-To-Length Carbon-Quality Steel Plate Products from Korea, 64 FR 73196 (Dep't Commerce Dec. 29, 1999), as amended, 65 FR 6585 (Dep't Commerce Feb 10, 2000) (1999 Korea AD Order). The scope of the antidumping duty investigation with regard to cut-to-length plate from Korea covers only (1) subject cut-to-length plate not within the physical description of cut-to-length carbon quality steel plate in the 1999 Korea AD Order, regardless of producer or exporter; and (2) cut-to-length plate produced and/or exported by those companies that were excluded or revoked from the 1999 Korea AD Order as of April 8, 2016. The only revoked or excluded company is Pohang Iron and Steel Company, also known as POSCO.

Korea CVD: At the time of the filing of the petition, there was an existing countervailing duty order on certain cut-to-length carbon-quality steel plate from Korea. See Final Affirmative Countervailing Duty Determination: Certain Cut-to-Length Carbon-Quality Steel Plate From the

Republic of Korea, 64 FR 73176 (Dep't Commerce Dec. 29, 1999), as amended, 65 FR 6587 (Dep't Commerce Feb. 10, 2000) (1999 Korea CVD Order). The scope of the countervailing duty investigation with regard to cut-to-length plate from Korea covers only (1) subject cut-to-length plate not within the physical description of cut-to-length carbon quality steel plate in the 1999 Korea CVD Order regardless of producer or exporter, and (2) cut-to-length plate produced and/or exported by those companies that were excluded or revoked from the 1999 Korea CVD Order as of April 8, 2016. The only revoked or excluded company is Pohang Iron and Steel Company, also known as POSCO.

China: Excluded from the scope of the antidumping duty investigation on cut-to-length plate from China are any products covered by the existing antidumping duty order on certain cut-to-length carbon steel plate from the People's Republic of China. See Suspension Agreement on Certain Cut-to-Length Carbon Steel Plate From the People's Republic of China; Termination of Suspension Agreement and Notice of Antidumping Duty Order, 68 FR 60081 (Dep't Commerce Oct. 21, 2003), as amended, Affirmative Final Determination of Circumvention of the Antidumping Duty Order on Certain Cut-to-Length Carbon Steel Plate From the People's Republic of China, 76 FR 50996, 50996-97 (Dep't of Commerce Aug. 17, 2011). On August 17, 2011, the U.S. Department of Commerce found that the order covered all imports of certain cut-to-length carbon steel plate products with 0.0008 percent or more boron, by weight, from China not meeting all of the following requirements: aluminum level of 0.02 percent or greater, by weight; a ratio of 3.4 to 1 or greater, by weight, of titanium to nitrogen; and a hardenability test (i.e., Jominy test) result indicating a boron factor of 1.8 or greater.[13]

CTL plate is a flat-rolled or press-forged carbon or alloy steel product that is generally 4.75 millimeters or more in thickness. CTL plate is available in a wide variety of widths, thicknesses, and shapes that are incorporated or further processed into other products. The term "cut-to-length" refers to a flat plate product with a defined length.[14] Most CTL plate is

[13] Certain Carbon and Alloy Steel Cut-to-Length Plate From Austria, Belgium, Brazil, the People's Republic of China, France, the Federal Republic of Germany, Italy, Japan, the Republic of Korea, the Republic of South Africa, Taiwan, and Turkey: Scope Comments Decision Memorandum for the Preliminary Determinations, U.S. Department of Commerce, International Trade Administration, September 6, 2016; Certain Carbon and Alloy Steel Cut-to-Length Plate From Austria, Belgium, Brazil, the People's Republic of China, France, the Federal Republic of Germany, Italy, Japan, the Republic of Korea, the Republic of South Africa, Taiwan, and Turkey: Final Scope Comments Decision Memorandum, U.S. Department of Commerce, International Trade Administration, November 29, 2016; Decision Memorandum for the Preliminary Affirmative Determination: Countervailing Duty Investigation of Certain Carbon and Alloy Steel Cut-to-Length Plate from the People's Republic of China, U.S. Department of Commerce, International Trade Administration, September 6, 2016; *Certain Carbon and Alloy Steel Cut-to-Length Plate From Brazil, South Africa, and the Republic of Turkey: Affirmative Final Determination of Sales at Less Than Fair Value and Affirmative Final Determinations of Critical Circumstances for Brazil and the Republic of Turkey*, 81 Fed. Reg. 87544, 87546-87548 (Dec. 5, 2016).

[14] CR at I-36, PR at I-30.

hot-rolled on a reversing plate mill, although it also may be rolled in Steckel mills and in continuous hot strip mills.[15] Most CTL plate is used in load-bearing and structural applications, such as agricultural and construction equipment, bridges, electricity transmission towers and light poles, buildings (especially nonresidential), and heavy transportation equipment, including railroad cars and ships. CTL plate is also used in the production of tanks, sills, floors, offshore drilling rigs, pipes, petrochemical plant and machinery, various other fabricated pieces, utility applications, such as wind towers, and pressure vessels.[16]

C. Arguments of the Parties

Petitioners argue that there is a single domestic like product that is coextensive with the scope of these investigations. Specifically, they argue that neither CTL plate used to produce X-70 pipeline ("X-70 CTL plate") nor tool steel are separate domestic like products from other CTL plate.[17] Petitioners contend that tool steel and other CTL plate share certain common physical characteristics, and that the uses for tool steel do not set it apart from other CTL plate because there are hundreds of specifications for CTL plate, each designed for a particular end-use and customer requirement.[18] Petitioners maintain that tool steel and other CTL plate are made in the same plants on the same equipment, and the special production techniques used by some tool steel producers are not required for all grades of tool steel and not used by all producers.[19] Petitioners contend that the channels of distribution for tool steel and other CTL plate are the same, including sales through service centers or distributors and sales directly to end users.[20] Petitioners argue that the lack of interchangeability between tool steel and other CTL plate does not suggest a separate like product because in most cases the 17 types of CTL plate identified in the Commission's questionnaire cannot be substituted for one another and that it is generally not even possible to substitute different grades of tool steel for one another.[21] Petitioners argue that the absence of an overlap in customers for tool steel and other CTL plate is not significant, given that specialized product characteristics for many types of CTL plate are likely to result in a limited customer base. Finally, they maintain that differing prices that

[15] CR at I-41-43, PR at I-34-36.

[16] CR at I-36, PR at I-31.

[17] As discussed below, no party argued in the final phase of these investigations that X-70 CTL plate should be defined as a separate domestic like product.

[18] AMUSA Prehearing Brief at 11 and Posthearing Brief at 4-5 and Exh. 1 at 6-13, Nucor Posthearing Brief, Exh. 1 at 26-27.

[19] AMUSA Prehearing Brief at 12 and Posthearing Brief, Exh. 1 at 13-15, Nucor Posthearing Brief, Exh. 1 at 31-32.

[20] AMUSA Prehearing Brief at 12 and Posthearing Brief, Exh. 1 at 19, Nucor Posthearing Brief, Exh. 1 at 29-30.

[21] AMUSA Prehearing Brief at 11-12 and Posthearing Brief, Exh. 1 at 15-16, Nucor Posthearing Brief, Exh. 1 at 28-29.

reflect different physical characteristics and production processes along a continuum do not differentiate tool steel from other CTL plate products.[22]

Tool Steel Respondents argue that tool steel should be treated as a separate domestic like product.[23] They contend that the Commission has had an established practice of treating tool steel as a separate like product, which it should follow in these investigations.[24] Tool Steel Respondents argue that tool steel is different from other CTL plate products in terms of chemical composition and mechanical properties, and that it has distinct uses.[25] They contend that tool steel and other CTL plate products are produced by different companies using different production facilities and processes.[26] Tool Steel Respondents argue that tool steel and other CTL plate are sold in different channels of distribution in that tool steel purchasers generally are producers of tools and machine dies, and specialized distributors.[27] Tool Steel Respondents maintain that there is a significant lack of interchangeability between tool steel and other CTL plate products in that for certain applications only tool steel can be used, and even where it is theoretically possible to use tool steel as a substitute for other types of CTL plate in some applications, doing so would not be economical.[28] Tool Steel Respondents argue that producers and consumers perceive tool steel as a separate product. Finally, Tool Steel Respondents argue that the price of tool steel is on average two to four times the price of other CTL plate products and even two times the price of other alloy CTL plate.[29]

D. Domestic Like Product Analysis

We define a single domestic like product, consisting of all CTL plate, that is coextensive with the scope of the investigations.[30]

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[22] AMUSA Prehearing Brief at 13 and Posthearing Brief, Exh. 1 at 19-21, Nucor Posthearing Brief, Exh. 1 at 32.

[23] Although Tool Steel Respondents state that they are using the term "tool steel" to encompass: tool steel, high speed steel, mold steel, chipper knife steel, and ball bearings steel, Tool Steel Respondents Prehearing Brief at 3-4, it is not clear that they use the term consistently in this way. For example, on page 20 of their prehearing brief they discuss "the alloy content for tool steel and high-speed steel," and on page 52 they refer to "US shipments of tool steel (including high speed steel)."

[24] Tool Steel Respondents Prehearing Brief at 5-17 and Posthearing Brief, Exh. 1 at 1.

[25] Tool Steel Respondents Prehearing Brief at 18-24 and Posthearing Brief at 4-5 and Exh. 1 at 3-6. The quoted excerpt from the Steel 201 investigation contrasted tool steel with stainless steel products. *Steel*, Inv. No. 201-TA-73, USITC Pub. 3479 at 200 (Dec. 2001).

[26] Tool Steel Respondents Prehearing Brief at 29-38 and Posthearing Brief at 5-6.

[27] Tool Steel Respondents Prehearing Brief at 44-46 and Posthearing Brief at 7.

[28] Tool Steel Respondents Prehearing Brief at 38-41 and Posthearing Brief at 6.

[29] Tool Steel Respondents Prehearing Brief at 46-49 and Posthearing Brief at 7-9.

[30] In the preliminary determinations, the Commission specifically considered and rejected contentions that carbon and alloy CTL plate are separate domestic like products, and that CTL plate used to produce X-70 pipeline is a separate domestic like product. With respect to the former issue, the Commission found that carbon and alloy CTL plate shared certain physical characteristics, were produced in the same facilities, had the same channels of distribution, and were interchangeable to some extent. *Preliminary Determinations*, USITC Pub. 4615 at 14-15. With respect to the latter issue, (Continued...)

We observe at the outset that the way in which Tool Steel Respondents have defined "tool steel" in their briefs (to encompass tool steel, high speed steel, mold steel, chipper knife steel, and ball bearings steel) does not necessarily align with the definitions we used to collect data concerning domestic production of this product. The data staff collected relating to the production of tool steel and high speed steel were based on the definitions of these products in the Subheading Notes and Additional U.S. Notes to Chapter 72 of the HTSUS.[31] Although mold steel, chipper knife steel, and ball bearings steel are generally considered to be subcategories of tool steel, the HTSUS subheadings and the notes to Chapter 72 do not specifically define mold steel.

Physical Characteristics and Uses. Tool steel and high speed steel share basic physical characteristics in terms of chemical composition and dimensions with other CTL plate products. All these products have two percent or less carbon content, are generally at least 4.75 mm thick and less than two inches thick.[32] In CTL plate production, various amounts of different alloying elements may be added to the melt to obtain a range of physical and mechanical characteristics.[33] Tool steel and high speed steel are defined as having a very specific range of carbon in relation to a very specific range of certain alloys.[34] While it may be true that tool steel and high speed steel generally have higher levels of alloys than other CTL plate, this is not a unique feature of tool steel and high speed steel; there are other CTL plate products that have relatively high levels of alloy and there is at least one type of tool steel with a relatively low alloy level.[35] Tool steel and high speed steel have different mechanical properties (for example,

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(…Continued)
the Commission found that CTL plate used to produce X-70 pipeline and other CTL plate shared common manufacturing facilities and channels of distribution, and that the X-70 CTL plate was not the sole type of CTL plate that had distinct characteristics that limited its interchangeability with other products, and led to somewhat different purchaser perceptions. *Id*. at 16-17. The record of the final phase of these investigations does not contain any additional information that would warrant reconsideration of these findings, nor have respondents renewed in the final phase of these investigations the arguments on these particular domestic like product issues that they raised in the preliminary phase.

[31] CR/PR at Table C-2, notes to table. The Commission collected questionnaire data using the definitions advocated by Hitachi in its comments ("Thus, Hitachi Metals proposes that, in PART I.—GENERAL INFORMATION of each questionnaire, the Commission add the Harmonized Tariff Schedule of the United States' Additional U.S. Note 1(e)'s definition of tool steel"). Hitachi Metals' Comments on Draft Questionnaires, September 13, 2016, p. 4. French and German Respondents in their comments also specifically referenced the HTS definition for tool steel for the purposes of collecting data for "tool steel plate." French and German Respondents' Comments on Draft Questionnaires, September 13, 2016, app. 3, pp. 2-3. Voestalpine also stated that tool steel and high speed steel should be defined "based on the definitions set forth in the USHTS." voestalpine's Comments on Draft Questionnaires, September 13, 2016, p. 4.

[32] CR at I-36, PR at I-30 and Petition, Vol. 1 at 24.

[33] CR at I-50, PR at I-41.

[34] *See* Tool Steel Respondents Prehearing Brief at 3-4.

[35] AMUSA Posthearing Brief, Exh. 1 at 9. We are not persuaded by Tool Steel Respondents' reference to statements by the Commission in the *Steel* 201 investigation that tool steel has a different chemical composition than stainless and carbon steel. The observation was made in the context of a (Continued...)

wear resistance, toughness, and hot or red hardness) than other CTL plate. The fact that these attributes may be imparted through heat treatment as well as through chemistry, as Petitioners note,[36] does not negate the distinct mechanical properties of tool steel and high speed steel.

Tool steel and high speed steel have specific uses (such as to produce cutting and forming tools), but other CTL plate products are also designed for specific end uses and customer requirements.[37]

Manufacturing Facilities, Production Processes and Employees. In some cases, tool steel and high speed steel are made in the same facilities, using at least some of the same production processes and the same employees as other CTL plate. The Commission received useable data from four producers of tool steel and high speed steel: AMUSA, Nucor, Niagara, and Universal. AMUSA makes tool steel and other CTL plate products, and Nucor makes high speed steel and other CTL plate products, in the same plants, using the same equipment, and the same employees.[38] A third producer, Niagara, reported making other types of CTL plate on the same equipment as it uses to make tool steel and high speed steel.[39] AMUSA, Nucor, and Niagara accounted for *** percent of the *** short tons of tool steel and high speed steel produced by the four reporting producers in 2015.[40]

In other cases, tool steel and high speed steel are not made in the same facilities as other CTL plate. The fourth reporting producer, Universal, only makes tool steel; it does not produce other CTL plate products.[41] There is also evidence in the record that the largest U.S. producers of tool steel and high speed steel, which did not respond to the Commission's questionnaire, are specialty steel producers that do not make other CTL plate products.[42] In

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(…Continued)
discussion comparing tool steel to stainless steel products and the Commission was not comparing tool steel to other types of carbon *and* alloy steel, as it is here. *See Steel*, Inv. No. 201-73, USITC Pub. No. 3479 at 200.

[36] AMUSA Posthearing Brief, Exh. 1 at 11.

[37] CR/PR at Table I-6 and II-1.

[38] AMUSA Posthearing Brief, Exh. 1 at 13, Nucor Posthearing Brief, Exh. 1 at 31-32 and Exh. 6

[39] Niagara U.S. Producers Questionnaire Response at II-11.

[40] Calculated from supplemental questionnaire responses of AMUSA, Nucor, and Niagara.

[41] Universal U.S. Producers Questionnaire Response at II-7 (when compared to supplemental questionnaire response at V-1).

[42] Tool Steel Respondents report that the two largest U.S. tool steel producers, ***, did not respond to the producers questionnaire and estimate that the Commission received U.S. producer questionnaire responses from firms accounting for only about *** percent of annual domestic tool steel production. *See* Tool Steel Respondents Prehearing Brief at 30 and Posthearing Brief at 2 and Exh. 2. We do not agree with Petitioners' assertion that these firms are not part of the CTL plate industry because they produce tool steel in long product form. AMUSA Posthearing Brief, Exh. 1 at 14-15. To the extent that these firms produce products that meet the specifications of the scope definition, their production would be encompassed within a domestic like product and they would be defined as domestic producers.

The Commission received limited information from Finkl Steel late in these investigations. Letter from Finkl Steel to Commission dated Dec. 9, 2016, and Emails from ***, Finkl Steel, to Karen Taylor, dated Dec. 16, 2016 (EDIS #598691).

some cases, tool steel and high speed steel may be subject to additional production processes (such as argon oxygen decarburization and electro-slag remelting) that are not used in the production of other CTL plate.[43]

Channels of Distribution. The great majority of the shipments of the tool steel and high speed steel producers responding to the Commission's questionnaire (***) went to distributors, and the rest was sold to end users.[44] ***, Finkl Steel, which identified itself as "one of the largest tool steel producers in the U.S.,"[45] stated that ***.[46] Thus, channels of distribution through which the tool steel and high speed steel producers sell their products are likely more evenly divided than the questionnaire response data indicate. For other CTL plate, in 2015 *** percent of shipments went to distributors, and *** percent went to end users. There is only limited information in the record relating to Tool Steel Respondents' assertion that tool steel and high speed steel are sold through specialized distributors that do not also carry other CTL plate products.[47] Tool steel and high speed steel tend to be sold to specific types of end users (producers of tools and machine dies) and specialized distributors,[48] but other types of CTL plate intended for specific applications also are sold to specific types of end users.[49]

Interchangeability. Tool steel and high speed steel are, for the most part, not interchangeable with other types of CTL plate. Other CTL plate cannot be used in most applications in which tool steel and high speed steel are required, and, although tool steel and high speed steel could theoretically be used in a few applications in lieu of other CTL plate, it would not be economic to do so, in light of the much higher cost of tool steel and high speed steel.[50]

Producer and Customer Perceptions. There is evidence in the record that tool steel and high speed steel are viewed by some producers and customers as a separate product, distinct from other CTL plate. As discussed above, to some extent tool steel and high speed steel are made by specialty steel producers that do not make other CTL plate. The letter from the Presidents of the National Tooling and Machining Association and the Precision Metalforming Association states that both producers and purchasers perceive tool steel to be an entirely separate product from other plate products. The testimony at the hearing by a metallurgist supported this view.[51]

On the other hand, there is also evidence that some producers and customers view tool steel and high speed steel as part of a range of different types of CTL plate products.[52] Tool

[43] AMUSA Posthearing Brief, Exh. 1 at 13-14.

[44] CR/PR at Table I-7.

[45] Letter from Finkl Steel to Commission dated Dec. 9, 2016.

[46] Emails from ***, Finkl Steel, to Karen Taylor, dated Dec. 16, 2016 (EDIS #598691).

[47] One tool steel producer reported that about ***. Memorandum of Telephone Conversation with ***, dated Dec. 15, 2016 (EDIS #598695).

[48] Hearing Transcript at 193 (O'Hara) and 194 (Vaughn).

[49] AMUSA Posthearing Brief, Exh. 1 at 12.

[50] Tool Steel Respondents' Prehearing Brief at 39-40.

[51] Hearing Transcript at 192 (O'Hara).

[52] Hearing Transcript at 56 and 111 (Insetta).

steel and high speed steel are marketed by some producers and distributors along with other CTL plate products.[53]

Price. Tool steel and high speed steel tend to command a much higher price than other CTL plate. For example, U.S. producers' average unit value for all CTL plate was $691 in 2015, compared to $*** for tool steel and $*** for high speed steel.[54] On the other hand, there is evidence in the record that other alloy CTL plate products can be priced higher than tool steel.[55]

Conclusion. On balance, we determine that tool steel and high speed steel are not a separate domestic like product from other CTL plate. While tool steel and high speed steel have some distinctive physical characteristics, these are not always unique to tool steel and high speed steel, and tool steel and high speed steel share other physical characteristics with other CTL plate. Tool steel and high speed steel have specific uses, but other CTL plate products are also designed for specific end uses. In considering manufacturing facilities, production processes, and employees, the evidence is mixed: in some cases, tool steel and high speed steel are made in the same facilities and by the same employees as other CTL plate products, in some cases not. The production of tool steel and high speed steel sometimes involves additional production processes, but sometimes not. The limited information in the record on channels of distribution shows that tool steel and high speed steel is more often sold through distributors than other CTL plate, although as noted above ***. Although tool steel and high speed steel are generally not interchangeable with other CTL plate products, the same could be said for other specialized CTL plate products. The evidence of producer and customer perceptions is mixed. The information on pricing indicates that tool steel and high speed steel are priced differently and generally much higher than most types of CTL plate, but that there are other specific types of CTL plate that are also highly priced.

In our view, the acknowledged differences between tool steel and high speed steel and other types of CTL plate are insufficient to warrant separate domestic like product treatment. In investigations such as these in which domestically manufactured merchandise is made up of a grouping of similar products or involves niche products, the Commission does not consider each item of merchandise to be a separate like product that is only "like" its identical counterpart in the scope, but considers the grouping itself to constitute the domestic like product[56] and "disregards minor variations,"[57] absent a "clear dividing line" between particular

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[53] AMUSA Posthearing Brief, Exh. 1 at 18 and Exh. 17, and Nucor Posthearing Brief at Exh. 1, 6, and 9, Hearing Transcript at 115 (Nordhues).

[54] CR at I-57-58, PR at I-45-46.

[55] Nucor Posthearing Brief, Exh. 6 at para. 8 and Att. 2.

[56] *See*, *e.g.*, *Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-547, 731-TA-1291-1297 (Preliminary), USITV Pub. 4570 at 10 (Oct. 2015); *Certain Seamless Carbon and Alloy Steel Standard, Line, and Pressure Pipe from China*, Inv. Nos. 701-TA-469 and 731-TA-1168 (Final), USITC Pub. 4190 (November 2010) at 8, n. 45; *Carbon and Certain Alloy Steel Wire Rod from China, Germany, and Turkey*, Inv. Nos. 731-TA-1099-1101 (Preliminary), USITC Pub. 3832 (January 2006) at 10 ("a lack of interchangeability among products comprising a continuum is not unexpected and not inconsistent with finding a single like product."); *Stainless Steel Bar from France, Germany, Italy, Korea, and the United*

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products in the group. As indicated above, we have examined closely whether the record supports finding a clear dividing line between tool steel and high speed steel on the one hand, and other CTL plate products on the other. Although the evidence is mixed, we have concluded that such a finding is not warranted. We therefore define a single domestic like product corresponding to the scope of these investigations.

We are not persuaded by Tool Steel Respondents' contention that the Commission has had an established practice of treating tool steel as a separate domestic like product in previous proceedings and that the Commission must give deference to such a practice.[58] Tool Steel Respondents have not identified any prior antidumping or countervailing duty investigation in which the scope included carbon and alloy steel (including tool steel) and the Commission decided that tool steel was a separate like product. Instead, they refer to the following: (i) statements by individual Commissioners or the Commission as a whole in cases under a different statutory scheme (Section 201 safeguards cases) relating to comparisons of tool steel with stainless steel;[59] (ii) the treatment of tool steel and stainless steel separately in Section 332 studies;[60] (iii) a countervailing duty investigation in which the scope was limited to tool steel; [61] and (iv) prior CTL plate investigations in which the scope did not include tool steel.[62] In our view, these do not show that the Commission has had an established practice of treating tool steel as a distinct domestic like product from carbon and alloy CTL plate products. Moreover, even if Tool Steel Respondents were correct, Commission determinations are not "precedents" that bind the Commission,[63] and the Commission makes its determinations on the record of each investigation.

III. Domestic Industry

The domestic industry is defined as the domestic "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."[64] 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.

(…Continued)
Kingdom, Inv. Nos. 701-TA-413 (Final) and 731-TA-913-916 and 918 (Final), USITC Pub. 3488 (February 2002) at 6-7.

[57] *See* S. Rep. No. 96-249 at 90-91 (1979).
[58] Tool Steel Respondents Prehearing Brief at 4-15.
[59] Tool Steel Respondents Prehearing Brief at 6-10.
[60] Tool Steel Respondents Prehearing Brief at 5.
[61] Tool Steel Respondents Prehearing Brief at 8.
[62] Tool Steel Respondents Prehearing Brief at 11-14.
[63] *E.g.*, *Nucor Corp. v. United States*, 414 F.3d 1291, 1299 (Fed. Cir. 2007).
[64] 19 U.S.C. § 1677(4)(A).

A. 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.[65]

In our preliminary determinations, we stated that "{t}here is no dispute that steel service center processors that transform steel plate products that do not correspond to the scope definition, *e.g.*, plate in coil, into CTL plate are part of the domestic industry."[66] No party addressed this issue in the final phase of these investigations and there is no additional information concerning the nature of steel service center processors' activities. For the reasons stated in the preliminary determinations, we again find that the steel service center processors that transform out-of-scope products into CTL plate engage in domestic production.

B. Related Parties

We must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.[67] Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.[68]

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[65] The Commission generally considers six factors: (1) source and extent of the firm's capital investment; (2) technical expertise involved in U.S. production activities; (3) value added to the product in the United States; (4) employment levels; (5) quantity and type of parts sourced in the United States; and (6) any other costs and activities in the United States directly leading to production of the like product. No single factor is determinative and the Commission may consider any other factors it deems relevant in light of the specific facts of any investigation. *Diamond Sawblades and Parts Thereof from China and Korea*, Inv. Nos. 731-TA-1092-93 (Final), USITC Pub. 3862 at 8-11 (July 2006).

[66] *Preliminary Determinations*, USITC Pub. 4615 at 17 n.71.

[67] *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).

[68] 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

(Continued...)

As discussed below, five domestic producers—***—are related parties because they imported subject merchandise during the period of investigation.[69]

For four of these related parties (***), the ratio of subject imports to domestic production was low during the period of investigation. The ratios did not exceed 7 percent for any of these producers during any portion of the period of investigation, and in most cases were much lower.[70] This suggests that the principal interest of each of these related parties is in domestic production.[71] There is no indication that the relatively small size of their imports relative to their domestic production shielded any of these domestic producers from subject imports. Also, no party argued that any of these producers should be excluded from the domestic industry. Accordingly, we do not find it appropriate to exclude *** from the domestic industry.

The other related party, ***, had higher ratios of subject imports to domestic production. Its ratio of subject imports to U.S. production ranged from a low of *** percent in interim 2016 to a high of *** percent in 2014.[72] For most of the period of investigation, this ratio was under *** percent, indicating that its principal interest is in domestic production.[73] *** supports the petition.[74] No party argued that *** should be excluded from the domestic industry. *** operating performance was *** than the industry average throughout the period of investigation,[75] but there is no apparent correlation between *** importation activities and

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(…Continued)

(5) whether the primary interest of the importing producer lies in domestic production or importation. *Changzhou Trina Solar Energy Co. v. USITC*, 100 F. Supp.3d 1314, 1326-31 (Ct. Int'l. Trade 2015); see *also Torrington Co. v. United States*, 790 F. Supp. at 1168.

[69] In addition, there are five domestic producers (***) that purchased but did not directly import subject merchandise. CR/PR at Table III-10. A domestic producer that does not itself import subject merchandise, or does not share a corporate affiliation with an importer, may nonetheless be deemed a related party if it controls large volumes of imports and such control exists where the domestic producer was responsible for a predominant proportion of an importer's purchases and the importer's purchases were substantial. *See Iron Construction Castings from Brazil, Canada, and China,* Inv. Nos. 701-TA-249, 731-TA-262, 263, and 265 (Fourth Review), USITC Pub. 4655 at 11 (Dec. 2016). In this case, none of the purchases of subject merchandise by any domestic producer was substantial. During the course of the period of investigation, the highest ratio of any individual producer's purchases from a subject country to total subject imports from that country was *** percent for ***. During any full year, the highest ratio of any individual producers' purchases from a subject country to total imports from that country was *** percent for *** 2013 purchases from Taiwan; however, this ratio was considerably lower in 2014 and 2015. Compiled from CR/PR at Tables III-10 and IV-2. We consequently find that none of the five U.S. producers which purchased subject merchandise are related parties.

[70] *See* CR/PR at Table III-9.

[71] We also note that *** support the petitions, while *** takes no position on them. CR/PR at Table III-1.

[72] CR/PR at Table III-9.

[73] CR/PR at Table III-9.

[74] CR at Table III-1.

[75] CR/PR at Table VI-3.

its financial performance, which ***. In light of these considerations, we find that appropriate circumstances do not exist to exclude *** from the domestic industry.

Accordingly, we define the domestic industry as all U.S. producers of CTL plate.

IV. Cumulation[76]

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

(1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality related questions;

[76] Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product that account for less than 3 percent of all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition shall be deemed negligible. 19 U.S.C. §§ 1671b(a), 1673b(a), 1677(24)(A)(i), 1677(24)(B); *see also* 15 C.F.R. § 2013.1 (developing countries for purposes of 19 U.S.C. § 1677(36)). The statute further provides that subject imports from a single country which comprise less than 3 percent of total such imports of the product may not be considered negligible if there are several countries subject to investigation with negligible imports and the sum of such imports from all those countries collectively accounts for more than 7 percent of the volume of all such merchandise imported into the United States. 19 U.S.C. § 1677(24)(A)(ii). In the case of countervailing duty investigations involving developing countries (as designated by the United States Trade Representative), the statute indicates that the negligibility limits are 4 percent and 9 percent, rather than 3 percent and 7 percent. 19 U.S.C. § 1677(24)(B). During April 2015-March 2016, the 12-month period prior to the filing of the petitions, subject imports from Brazil (2.5 percent), South Africa (1.6 percent), and Turkey (1.3 percent) were each below the 3 percent individual subject country statutory negligibility threshold applicable to antidumping duty investigations. CR/PR at Table IV-4. In determining whether the aggregate statutory threshold is met, we consider all sources with respect to which investigations were simultaneously initiated. 19 U.S.C. § 1677(24)(A)(ii). There are six countries for which CTL plate investigations were simultaneously initiated for which imports were below the 3 percent individual subject country statutory negligibility threshold applicable to antidumping duty investigations. The other three countries are Austria (1.1 percent), Belgium (1.1 percent), and Taiwan (1.6 percent), and the aggregate percentage of imports from these six sources during the 12-month negligibility period was 9.2 percent. CR/PR at Table IV-4. Because this exceeds the 7 percent statutory threshold pertinent to aggregated imports from individually negligible sources, we find that subject imports are not negligible for purposes of the antidumping duty investigations on CTL plate from Brazil, South Africa, and Turkey.

(2) the presence of sales or offers to sell in the same geographic markets of subject imports from different countries and the domestic like product;

(3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and

(4) whether the subject imports are simultaneously present in the market.[77]

While no single factor is necessarily determinative, and the list of factors is not exclusive, these factors are intended to provide the Commission with a framework for determining whether the subject imports compete with each other and with the domestic like product.[78] Only a "reasonable overlap" of competition is required.[79]

A. Arguments of the Parties

Petitioners. Petitioners argue that the Commission should cumulate all subject imports. They argue that CTL plate from all subject sources and from the domestic industry is fungible. They note that CTL plate, regardless of source, is generally produced in accordance with certain standards, including American Society for Testing and Materials, American Petroleum Institute, and Society of Automotive Engineers standards.[80] Petitioners maintain that domestic CTL plate competes with subject imports across virtually all plate products.[81] Petitioners take issue with respondents' arguments that the presence of subject imports of X-70 CTL plate, tool steel, and high speed steel demonstrate lack of fungibility with the domestic like product. They contend that the majority of subject imports from each of the subject countries was of the more basic, commodity grades of CTL plate. Moreover, Petitioners argue that domestic producers compete with subject imports for sales of all three of these products. With respect to X-70 CTL plate specifically, Petitioners argue that it was not the inability of U.S. producers to make X-70 CTL plate that led to increased subject imports of that product, but rather the low prices of these imports. Petitioners also contend that the domestic industry can and does supply tool steel and

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

[78] *See*, *e.g.*, *Wieland Werke, AG v. United State*s, 718 F. Supp. 50 (Ct. Int'l Trade 1989).

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

[80] AMUSA Prehearing Brief at 20-31 and Posthearing Brief, Exh. 1 at 48-51 and 52-53, SSAB Prehearing Brief at 11-15, Nucor Posthearing Brief at 2-5 and Posthearing Brief, Exh. 1 at 1-11.

[81] AMUSA Prehearing Brief at 20-31 and Posthearing Brief, Exh. 1 at 48-51 and 52-53, SSAB Prehearing Brief at 11-15, Nucor Posthearing Brief at 2-5 and Posthearing Brief, Exh. 1 at 1-11.

high speed steel to the U.S. market. Moreover, they note that these products accounted for a very small percentage of subject imports.[82]

Petitioners argue that there is extensive geographic overlap in sales of subject imports from each subject country and sales by domestic producers; that domestic CTL plate and imports from each of the subject countries were sold in the same channels of distribution (to distributors and end users); and that imports from each subject country and the domestic like product were simultaneously present in the market.[83]

Respondents. Voestalpine argues that the Commission should not cumulate subject imports from Austria with those from other subject countries. Voestalpine maintains that there is limited fungibility between the domestic like product and subject imports from Austria because these imports are often specialized grades not made in the United States. Subject imports from Austria and the domestic like product are shipped through different channels of distribution because U.S. producers ship almost equally to end users and distributors, whereas most imports from Austria are sold through distributors, according to voestalpine. Subject imports from Austria are concentrated in one geographic market with the great majority of those imports entering in the East and South regions of the United States. Voestalpine maintains that subject imports from Austria are not simultaneously in the market with the domestic product because the U.S. industry is unable or unwilling to produce many of the products imported from Austria.[84]

CSC argues that the Commission should not cumulate subject imports from Taiwan with those from other subject countries. It argues that two producers in Taiwan do not make X-70 CTL plate and that one of these producers is limited in the dimensions in which it can produce CTL plate. CSC further argues that there appear to be differences in the geographic range of imports insofar as subject imports from Taiwan are shipped mostly to West Coast ports.[85]

B. Reasonable Overlap of Competition

The statutory threshold for cumulation is satisfied in these investigations because Petitioners filed the antidumping and countervailing duty petitions with respect to all 12 countries on the same day, April 8, 2016. [86] [87] As discussed below, we find that there is a

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[82] AMUSA Prehearing Brief at 20-31 and Posthearing Brief, Exh. 1 at 48-51 and 52-53, SSAB Prehearing Brief at 11-15, Nucor Posthearing Brief at 2-5 and Posthearing Brief, Exh. 1 at 1-11.

[83] AMUSA Prehearing Brief at 31-33 and Posthearing Brief, Exh. 1 at 51-52 and 53-54, SSAB Prehearing Brief at 15-17, Nucor Posthearing Brief at 11-14.

[84] Voestalpine Prehearing Brief at 12-13 and 14-17 and Posthearing Brief at 3-9.

[85] CSC Prehearing Brief at 5-7.

[86] None of the statutory exceptions to cumulation applies.

[87] We observe that because of the manner in which the scopes of the antidumping and countervailing duty investigations with respect to China are defined, there are certain imports from China that may be subject to the countervailing duty investigation but not the antidumping investigation. *See* CR/PR at IV-2 n.4. We have previously explained why we are continuing our longstanding practice of cross-cumulating dumped and subsidized imports. *See Polyethylene*
(Continued...)

reasonable overlap of competition among subject imports from these 12 countries and between subject imports from each source and the domestic like product.

Fungibility. The record indicates that there is at least a moderate-to-high degree of substitutability between domestically produced CTL plate and imports from subject sources for the majority of CTL plate volumes.[88] All responding U.S. producers reported that product from each subject source was always or frequently interchangeable with the domestic product, with the exception of China and Brazil where one producer each reported that these products were sometimes interchangeable.[89] The responses of importers and purchasers were more mixed. Most responding importers reported that CTL plate from each of the 12 subject countries was always or frequently interchangeable with the domestic like product, with the exception of CTL plate from China and Germany for which pluralities reported that the imports and the domestic like product were sometimes interchangeable. A few importers stated that CTL plate from Austria, China, and Japan was never interchangeable with the domestic product. Most responding importers reported that subject imports of CTL plate were either always or frequently interchangeable with each other.[90] A majority of responding purchasers reported that domestically produced CTL plate was always or frequently interchangeable with CTL plate from each subject country except China.[91]

Purchasers were asked to compare the domestic like product and imports from each subject country with respect to 16 non-price purchasing factors. In each comparison of the domestic like product and imports from a specific subject country, pluralities or majorities of purchasers found the products comparable with respect to between 12 and 15 of these factors.[92]

Furthermore, most responding purchasers reported that domestically produced CTL plate always or usually met minimum quality specifications; most responding purchasers reported that CTL plate from Austria, Belgium, Germany, Japan, Korea (POSCO), Taiwan, and Turkey always met minimum quality specifications and that CTL plate from China, Brazil, France, Italy, South Africa always or usually met minimum quality specifications.[93]

On balance, we find that the record in these investigations indicates a sufficient degree of fungibility between and among subject imports from each subject country and the domestic like product to satisfy the "reasonable overlap" standard.

We are not persuaded by Austrian Respondents' argument that there is limited fungibility between the domestic like product and subject imports from Austria. Austrian Respondents contend that subject imports from Austria are often specialized grades not made in the United States. They do not, however, quantify the portion of subject imports from

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Terephthalate (PET) Resin from Canada, China, India, and Oman, Inv. Nos. 701-TA-531-532 and 731-TA-1270-1273 (Final), USITC Pub. 4604 at 9-11 (April 2016).

[88] CR at II-25-26, PR at II-17.

[89] CR at II-43, PR at II-30 and CR/PR at Table II-12.

[90] CR at II-43-44, PR at II-30 and CR/PR at Table II-12.

[91] CR at II-48, PR at II-34 and CR/PR at Table II-12.

[92] CR/PR at Table II-10.

[93] CR at II-51, PR at II-36 and CR/PR at Table II-13.

Austria that consist of such products. Instead, they support this contention by pointing to several examples where importers and purchasers stated that products which they sourced from Austria could not be obtained domestically.[94] Four of the six examples given relate to tool steel and high speed steel products. (The other two relate to plate for ***.) Yet, ***.[95] Thus, even assuming *arguendo* that the domestic industry cannot make certain types of tool steel and high speed steel that are supplied by producers in Austria, it would appear that the great majority of subject imports from Austria are not such specialty products. Indeed, there were subject imports from Austria in 10 of the 17 CTL plate product categories for which the Commission sought information.[96]

We are also not persuaded by CSC's argument that subject imports from Taiwan are not fungible with imports from other subject countries because two of the CTL producers in Taiwan do not make X-70 CTL plate and because one of these producers, Shang Chen, is limited in the dimensions in which it can produce CTL plate.[97] Most other subject countries either shipped no X-70 CTL plate, or volumes of it accounting for less than half of their total shipments, to the United States.[98] Even the two subject countries for which X-70 CTL plate accounted for *** of shipments to the United States, France and Germany, exported substantial proportions of other CTL plate products to the United States. In 2015, *** percent of U.S. importers' U.S. shipments from France consisted of CTL plate other than X-70 product, and *** percent of U.S. importers' U.S. shipments from Germany consisted of such product.[99] We stated in our preliminary determinations that the fact that CTL plate other than X-70 CTL plate represented substantial percentages of subject imports from both France and Germany and the majority of the domestic like product and subject imports from all other subject countries (including Taiwan), indicates a sufficient degree of overlap between and among subject imports from each subject country and the domestic like product to satisfy the "reasonable overlap" standard.[100] We believe the record of the final phase of these investigations warrants the same conclusion. Finally, the fact that one producer in Taiwan, Shang Chen, is limited in the dimensions in which

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[94] Austrian Respondents' Prehearing Brief at 7-11 and 15.

[95] Tool steel and high speed steel accounted for the following shares of the quantity of total subject imports from Austria: *** percent in 2013, *** percent in 2014, and *** percent in 2015. CR/PR at Table IV-16.

[96] CR/PR at Table IV-17.

[97] These two producers, CSC and Shang Chen, accounted for *** percent of CTL plate production in Taiwan in 2015. CR/PR at Table VII-46.

[98] *See* CR/PR at Table IV-16.

[99] *See* CR/PR at Table IV-16; *see also* French and German Respondents' Postconference Br. at 11-12.

[100] *Preliminary Determinations*, USITC Pub. 4615 at 27-28. Notwithstanding Respondents' assertions to the contrary, the record also does not indicate that there is no competition between the domestic industry and subject producers of X-70 CTL plate. For example, one of the pricing products (Product 5) covers X-70 CTL plate and it indicates head-to-head competition between the domestic like product and subject imports from France, Germany, Japan, and Korea during the period of investigation. CR/PR at Table V-7. In 2015, U.S. producers' U.S. shipments of X-70 CTL plate accounted for 27.4 percent of apparent consumption of that product. CR/PR at Table IV-13.

it can produce CTL plate does not indicate that subject imports from Taiwan are not fungible with the domestic like product and other subject imports in the dimensions that Shang Chen can produce.

Channels of Distribution. U.S. shipments of CTL plate from domestic producers and importers are sold to both distributors and end users. In 2015, the majority of subject imports from Austria (*** percent), Brazil (*** percent), China (*** percent), Italy (*** percent), Japan (*** percent), South Africa (*** percent), and Turkey (*** percent) were sold to distributors.[101] Substantial portions of domestic producers' U.S. shipments (*** percent), as well as imports from Belgium (*** percent), France (*** percent), Germany (*** percent), and Korea (POSCO) (*** percent), also were sold to distributors.[102] Consequently, the record indicates an overlap of channels of distribution between the domestic like product and subject imports from all sources, including Austria.

Geographic Overlap. Domestically produced CTL plate is sold nationwide.[103] Subject imports from all subject sources also are sold throughout the continental United States, with very limited exceptions. In particular, subject imports from Austria were sold in every U.S. region.[104]

Simultaneous Presence in Market. Imports of CTL plate from all subject sources were present in the U.S. market in almost every month during the period of investigation.[105]

Conclusion. The information in the record supports a finding that imports from each subject country are fungible with the domestic like product and each other, that imports from each of the subject countries and the domestic like product are sold in similar channels of distribution, similar geographic markets, and have been simultaneously present in the U.S. market. Accordingly, we find that there is a reasonable overlap of competition between the domestic like product and imports from each subject country and between imports from each subject country, and we consider all subject imports on a cumulated basis.

V. Material Injury by Reason of Subject Imports

Based on the record in the final phase of these investigations, we find that an industry in the United States is materially injured by reason of imports of CTL plate from Brazil, South Africa, and Turkey that Commerce has found to be sold in the United States at less than fair value.

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[101] CR/PR at Table II-1.

[102] CR/PR at Table II-1.

[103] CR/PR at Table II-2.

[104] Importers reported selling imports from each subject country in all six regions of the continental United States, except that subject imports from South Africa were not sold in the Mountain region. CR/PR at Table II-2.

[105] Imports from all subject sources were present in every month of the period of investigation, except imports from Brazil were present in 34 of the 45 months of the period and imports from South Africa which were present in 28 months. CR/PR at Table IV-18.

A. Legal Standards

In the final phase of antidumping and countervailing duty investigations, the Commission determines whether an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.[106] In making this determination, the Commission must consider the volume of subject imports, their effect on prices for the domestic like product, and their impact on domestic producers of the domestic like product, but only in the context of U.S. production operations.[107] The statute defines "material injury" as "harm which is not inconsequential, immaterial, or unimportant."[108] In assessing whether the domestic industry is materially injured by reason of subject imports, we consider all relevant economic factors that bear on the state of the industry in the United States.[109] No single factor is dispositive, and all relevant factors are considered "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[110]

Although the statute requires the Commission to determine whether the domestic industry is "materially injured or threatened with material injury by reason of" unfairly traded imports,[111] it does not define the phrase "by reason of," indicating that this aspect of the injury analysis is left to the Commission's reasonable exercise of its discretion.[112] In identifying a causal link, if any, between subject imports and material injury to the domestic industry, the Commission examines the facts of record that relate to the significance of the volume and price effects of the subject imports and any impact of those imports on the condition of the domestic industry. This evaluation under the "by reason of" standard must ensure that subject imports are more than a minimal or tangential cause of injury and that there is a sufficient causal, not merely a temporal, nexus between subject imports and material injury.[113]

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[106] 19 U.S.C. §§ 1671d(b), 1673d(b). The Trade Preferences Extension Act of 2015, Pub. L. 114-27, amended the provisions of the Tariff Act pertaining to Commission determinations of material injury and threat of material injury by reason of subject imports in certain respects. We have applied these amendments here.

[107] 19 U.S.C. § 1677(7)(B). The Commission "may consider such other economic factors as are relevant to the determination" but shall "identify each {such} factor ... and explain in full its relevance to the determination." 19 U.S.C. § 1677(7)(B).

[108] 19 U.S.C. § 1677(7)(A).

[109] 19 U.S.C. § 1677(7)(C)(iii).

[110] 19 U.S.C. § 1677(7)(C)(iii).

[111] 19 U.S.C. §§ 1671d(a), 1673d(a).

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

[113] The Federal Circuit, in addressing the causation standard of the statute, observed that "{a}s long as its effects are not merely incidental, tangential, or trivial, the foreign product sold at less than fair value meets the causation requirement*." Nippon Steel Corp. v. USITC*, 345 F.3d 1379, 1384 (Fed. Cir. 2003). This was further ratified in *Mittal Steel Point Lisas Ltd. v. United States*, 542 F.3d 867, 873 (Fed. Cir. 2008), where the Federal Circuit, quoting *Gerald Metals, Inc. v. United States*, 132 F.3d 716, 722 (Fed. Cir. 1997), stated that "this court requires evidence in the record 'to show that the harm occurred (Continued...)

In many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry. Such economic factors might include nonsubject imports; changes in technology, demand, or consumer tastes; competition among domestic producers; or management decisions by domestic producers. The legislative history explains that the Commission must examine factors other than subject imports to ensure that it is not attributing injury from other factors to the subject imports, thereby inflating an otherwise tangential cause of injury into one that satisfies the statutory material injury threshold.[114] In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.[115] Nor does the "by reason of" standard require that unfairly traded imports be the "principal" cause of injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry.[116] It is

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"by reason of" the LTFV imports, not by reason of a minimal or tangential contribution to material harm caused by LTFV goods.'" *See also Nippon Steel Corp. v. United States*, 458 F.3d 1345, 1357 (Fed. Cir. 2006); *Taiwan Semiconductor Industry Ass'n v. USITC*, 266 F.3d 1339, 1345 (Fed. Cir. 2001).

[114] SAA at 851-52 ("{T}he Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports."); S. Rep. 96-249 at 75 (1979) (the Commission "will consider information which indicates that harm is caused by factors other than less-than-fair-value imports."); H.R. Rep. 96-317 at 47 (1979) ("in examining the overall injury being experienced by a domestic industry, the ITC will take into account evidence presented to it which demonstrates that the harm attributed by the petitioner to the subsidized or dumped imports is attributable to such other factors;" those factors include "the volume and prices of nonsubsidized imports or imports sold at fair value, contraction in demand or changes in patterns of consumption, trade restrictive practices of and competition between the foreign and domestic producers, developments in technology and the export performance and productivity of the domestic industry"); *accord Mittal Steel*, 542 F.3d at 877.

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

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

clear that the existence of injury caused by other factors does not compel a negative determination.[117]

Assessment of whether material injury to the domestic industry is "by reason of" subject imports "does not require the Commission to address the causation issue in any particular way" as long as "the injury to the domestic industry can reasonably be attributed to the subject imports" and the Commission "ensure{s} that it is not attributing injury from other sources to the subject imports."[118] [119] Indeed, the Federal Circuit has examined and affirmed various Commission methodologies and has disavowed "rigid adherence to a specific formula."[120]

The Federal Circuit's decisions in *Gerald Metals, Bratsk*, and *Mittal Steel* all involved cases where the relevant "other factor" was the presence in the market of significant volumes of price-competitive nonsubject imports. The Commission interpreted the Federal Circuit's guidance in *Bratsk* as requiring it to apply a particular additional methodology following its finding of material injury in cases involving commodity products and a significant market presence of price-competitive nonsubject imports.[121] The additional "replacement/benefit" test looked at whether nonsubject imports might have replaced subject imports without any

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

[118] *Mittal Steel*, 542 F.3d at 877-78; *see also id.* at 873 ("While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured 'by reason of' subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology.") *citing United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75. In its decision in *Swiff-Train v. United States*, 792 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission's causation analysis as comporting with the Court's guidance in *Mittal*.

[119] Commissioners Pinkert and Kieff do not join this paragraph or the following three paragraphs. They point out that the Federal Circuit, in *Bratsk*, 444 F.3d 1369, and *Mittal Steel*, held that the Commission is *required*, in certain circumstances when analyzing present material injury, to consider a particular issue with respect to the role of nonsubject imports, without reliance upon presumptions or rigid formulas. The Court has not prescribed a specific method of exposition for this consideration. *Mittal Steel* explains as follows:

> What *Bratsk* held is that "where commodity products are at issue and fairly traded, price competitive, non-subject imports are in the market," the Commission would not fulfill its obligation to consider an important aspect of the problem if it failed to consider whether non-subject or non-LTFV imports would have replaced LTFV subject imports during the period of investigation without a continuing benefit to the domestic industry. 444 F.3d at 1369. Under those circumstances, *Bratsk* requires the Commission to consider whether replacement of the LTFV subject imports might have occurred during the period of investigation, and it requires the Commission to provide an explanation of its conclusion with respect to that factor.

542 F.3d at 878.

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

[121] *Mittal Steel*, 542 F.3d at 875-79.

benefit to the U.S. industry. The Commission applied that specific additional test in subsequent cases, including the *Carbon and Certain Alloy Steel Wire Rod from Trinidad and Tobago* determination that underlies the *Mittal Steel* litigation.

Mittal Steel clarifies that the Commission's interpretation of *Bratsk* was too rigid and makes clear that the Federal Circuit does not require the Commission to apply an additional test nor any one specific methodology; instead, the court requires the Commission to have "evidence in the record" to "show that the harm occurred 'by reason of' the LTFV imports," and requires that the Commission not attribute injury from nonsubject imports or other factors to subject imports.[122] Accordingly, we do not consider ourselves required to apply the replacement/benefit test that was included in Commission opinions subsequent to *Bratsk*.

The progression of *Gerald Metals, Bratsk*, and *Mittal Steel* clarifies that, in cases involving commodity products where price-competitive nonsubject imports are a significant factor in the U.S. market, the Court will require the Commission to give full consideration, with adequate explanation, to non-attribution issues when it performs its causation analysis.[123]

The question of whether the material injury threshold for subject imports is satisfied notwithstanding any injury from other factors is factual, subject to review under the substantial evidence standard.[124] Congress has delegated this factual finding to the Commission because of the agency's institutional expertise in resolving injury issues.[125]

B. Conditions of Competition and the Business Cycle

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

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[122] *Mittal Steel*, 542 F.3d at 873 (quoting from *Gerald Metals*, 132 F.3d at 722), 875-79 & n.2 (recognizing the Commission's alternative interpretation of *Bratsk* as a reminder to conduct a non-attribution analysis).

[123] To that end, after the Federal Circuit issued its decision in *Bratsk*, the Commission began to present published information or send out information requests in the final phase of investigations to producers in nonsubject countries that accounted for substantial shares of U.S. imports of subject merchandise (if, in fact, there were large nonsubject import suppliers). In order to provide a more complete record for the Commission's causation analysis, these requests typically seek information on capacity, production, and shipments of the product under investigation in the major source countries that export to the United States. The Commission plans to continue utilizing published or requested information in the final phase of investigations in which there are substantial levels of nonsubject imports.

[124] We provide in our respective discussions of volume, price effects, and impact a full analysis of other factors alleged to have caused any material injury experienced by the domestic industry.

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

1. Demand Considerations

U.S. demand for CTL plate depends on the demand for U.S.-produced downstream products. Uses for CTL plate include construction, infrastructure, heavy industrial production, line pipe, shipbuilding, barges, tanks, railcars and rail transportation, tractors, wind towers, electricity transmission poles, and oil and gas structures.[126]

Responses from U.S. producers, importers, and purchasers were mixed regarding how demand for CTL plate within the United States changed between January 2013 and December 2014. A plurality of these firms reported that demand inside the United States had increased during this period, but a majority of each type of market participant reported that demand has declined since January 2015.[127] Market participants further reported that demand declined in most of the major end-use markets for CTL plate since January 2015.[128]

Apparent U.S. consumption of CTL plate increased from 8.8 million short tons in 2013 to 9.9 million short tons in 2014, decreased to 8.3 million short tons in 2015, and was 6.6 million short tons in interim 2015 and 6.0 million short tons in interim 2016.[129]

2. Supply Considerations

The U.S. market for CTL plate is supplied by the domestic industry, subject imports, and nonsubject imports. The domestic industry had the largest share of the U.S. market during the period of investigation, although its share declined. The domestic industry's market share declined from 89.8 percent in 2013 to 82.1 percent in 2014, remained at that level in 2015, and was higher in interim 2016 (83.6 percent) than in interim 2015 (81.5 percent).[130] The domestic industry's production capacity declined from 12.9 million short tons in 2013 to 12.5 million short tons in 2014, remained at that level in 2015, and was 9.3 million short tons in both interim 2015 and interim 2016.[131] There were a number of changes in the domestic industry's operations during the period of investigation. Five U.S. producers -- AMUSA, Cargill, EVRAZ, Gerdau, and Kloeckner -- closed production facilities.[132] One producer (Optima) filed for bankruptcy.[133] Six domestic producers (AMUSA, CMC, JSW, Nucor, and Universal) reported shutdowns or curtailments in their production of CTL plate.[134] One domestic producer (Metals USA) reported an expansion in production capacity, one domestic producer (Cargill) added a facility, and four producers (AMUSA, Nucor, Ryerson, and SSAB) reported capital investments and upgrades to their production facilities.[135] Nucor acquired the U.S. producer Joy Global.[136]

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[126] CR at II-12-13, PR at II-9.
[127] CR at II-16-17, PR at II-10-11, and CR/PR at Table II-5.
[128] *See* CR/PR at Table II-5.
[129] CR/PR at Table IV-21.
[130] CR/PR at Table IV-21.
[131] CR/PR at Table III-5.
[132] CR/PR at Table III-4.
[133] CR/PR at Table III-3.
[134] CR/PR at Tables III-3 and III-4.
[135] CR/PR at Table III-4.

Subject imports were the second largest source of supply for the U.S market during the period of investigation. Cumulated subject imports' share of apparent U.S. consumption increased from *** percent in 2013 to *** percent in 2014 and to *** percent in 2015, an overall increase of *** percentage points between 2013 and 2015. Cumulated subject imports accounted for *** percent of apparent U.S. consumption in interim 2015 and *** percent in interim 2016.[137]

Nonsubject imports had a smaller presence in the U.S. market than either the domestic industry or subject imports throughout the period of investigation. Nonsubject imports' share of apparent U.S. consumption increased from *** percent in 2013 to *** percent in 2014, declined to *** percent in 2015, and was *** percent in interim 2015 and *** percent in interim 2016.[138] The largest sources of nonsubject imports were Canada and Mexico.[139] CTL plate products from China, India, Indonesia, Korea, Russia, and Ukraine are currently subject to suspension agreements, antidumping duty orders, and/or countervailing duty orders in the United States.[140]

3. Substitutability and Other Conditions

The record indicates that there is a moderate-to-high degree of substitutability between domestically produced CTL plate and CTL plate imported from subject sources of the same or similar specifications.[141] As discussed above, most U.S. producers reported that CTL plate from U.S. and subject sources was always or frequently interchangeable,[142] and importers and purchasers generally reported these products were sometimes or frequently interchangeable.[143] Furthermore, most purchasers reported that CTL plate from the United States and most subject countries were comparable on all 17 purchasing factors identified in the Commission's questionnaire, except availability, delivery terms, delivery time, and price.[144] We recognize that there are instances where purchasers and importers reported that certain

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[136] In February 2013, Kentucky Electric Steel was acquired by Optima Specialty Steel, Inc. CR/PR at Table III-3.

[137] CR/PR at Table IV-21.

[138] CR/PR at Table IV-21.

[139] CR/PR at Table IV-2.

[140] CR at I-12 n.24, PR at I-12 n.24 and CR/PR at Table I-1. As explained in Commerce's description of the scope of these investigations, the existing antidumping and countervailing duty orders for certain cut-to-length plate from Korea and the existing antidumping duty order for certain cut-to-length plate from China are limited to carbon CTL plate products. Imports of CTL plate from producer/exporter POSCO are not subject to the existing antidumping order on subject imports from Korea and hence are subject imports for purposes of these current investigations. CR at I-33-34, PR at I-28-29.

[141] CR at II-25, PR at II-17 and CR/PR at Table II-10.

[142] CR at II-43, PR at II-30 and CR/PR at Table II-12.

[143] CR at II-43-44 and 48, PR at II-30 and CR/PR at Table II-12.

[144] CR at II-36, PR at II-23 and CR/PR at Table II-10.

types or grades of CTL plate were not available from domestic manufacturers,[145] but the products involved accounted for a relatively small share of the overall market for CTL plate.[146]

The record also indicates that price is an important factor in purchasing decisions in the U.S. CTL plate market. When asked to assess how often differences other than price were significant in sales of CTL plate from the United States, subject countries, and nonsubject countries, nearly all U.S. producers, and most importers and purchasers, reported that differences other than price with respect to CTL plate from all country sources were only sometimes or never important.[147]

Raw material costs constitute a substantial portion of the final costs of CTL plate. These costs as a share of total cost of goods sold decreased from 62.7 percent in 2013 to 57.0 percent in 2015.[148] Prices for the primary raw materials used to produce CTL plate fluctuated over the period of investigation, although the prices for most inputs showed an overall decline. Between January 2013 and September 2016 prices for coal, carbon steel scrap, and hot-rolled coil decreased by 11.6, 38.0, and 15.3 percent, respectively, while prices for iron ore increased by 8.1 percent.[149] Energy is also an important factor in CTL plate production. Electricity prices generally fluctuated over the period of investigation, while natural gas prices declined irregularly.[150]

U.S. producers reported selling more than half of their product in the spot market in 2015 and importers reported selling nearly two-thirds of their product in the spot market. Most of the rest of U.S. producers' and importers' sales were made pursuant to short-term contracts.[151]

C. Volume of Subject Imports

Section 771(7)(C)(i) of the Tariff Act provides that the "Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant."[152]

The quantity and market share of cumulated subject imports more than doubled between 2013 and 2015. Cumulated subject imports increased from *** short tons in 2013 to *** short tons in 2014, and then declined slightly to *** short tons in 2015. Subject imports were *** short tons in interim 2015 and *** short tons in interim 2016.[153] As explained above, apparent U.S. consumption increased by 12.6 percent between 2013 and 2014, and then fell by 16.6 percent between 2014 and 2015, for an overall decline of 6.0 percent between 2013 and

[145] *See* CR/PR at Tables D-1 and D-2.
[146] *See* CR/PR at Table IV-16.
[147] CR at II-52, PR at II-36 and CR/PR at Table II-14.
[148] CR/PR at V-1.
[149] CR/PR at V-1 and CR/PR at Figure V-1.
[150] CR at V-3, PR at V-2 and CR/PR at Figure V-2.
[151] CR at V-5, PR at V-4 and CR/PR at Table V-2.
[152] 19 U.S.C. § 1677(7)(C)(i).
[153] CR/PR at Table IV-2.

2015. Apparent U.S. consumption was 9.8 percent lower in interim 2016 than interim 2015.[154] The volume of cumulated subject imports rose much faster than the growth in U.S. apparent consumption from 2013 to 2014 (increasing by *** percent), and declined only slightly (by *** percent) from 2014 to 2015, for an overall gain of *** percent between 2013 and 2015. The volume of subject imports was *** percent lower in interim 2016 than in interim 2015.[155]

The market share (by quantity) of cumulated subject imports increased from *** percent in 2013 to *** percent in 2014 and to *** percent in 2015. The market share of subject imports was *** percent in interim 2015 and *** percent in interim 2016.[156] The gain in market share by subject imports between 2013 and 2014 came entirely at the expense of the domestic industry, whose market share decreased from 89.8 percent in 2013 to 82.1 percent in 2014.[157] The domestic industry also lost a smaller amount of market share to nonsubject imports in this period.[158] Between 2014 and 2015, the domestic industry's market share was constant at 82.1 percent, while the gain in market share by subject imports came at the expense of nonsubject imports.[159] We acknowledge that the volume and market share of cumulated subject imports were lower in interim 2016 than in interim 2015; nevertheless, the market share of cumulated subject imports in 2016 was still higher – and that of the domestic industry still lower – than at the beginning of the POI.

We have considered the arguments by certain respondents that we should not use official import data to calculate changes in market share of subject imports, but rather that we should lag import data in an attempt to measure this market share at the point at which purchasing decisions were made and the product is ordered. These respondents maintain that when the import data is lagged in this way, subject imports can be seen to be highly responsive to the decline in demand in 2015.[160] We decline to adopt this methodology. The Commission's customary practice has been to consider imports at the time they enter the U.S. market, and we do not find that the conditions of competition in these investigations warrant deviation from that practice. In any event, respondents' proposed methodology is both impractical and internally inconsistent. It would be impractical to lag import data in investigations such as these where we are evaluating on a cumulated basis imports from a number of different countries that may have different lead times between when orders are placed and when imports enter the United States.[161] Moreover, advance orders do not necessarily distinguish the subject imports from the domestic like product; purchasing decisions involving the domestic like product also are often made before that product is shipped.[162] Thus, a consistent

[154] CR/PR at Table C-1.

[155] CR/PR at Table C-1.

[156] CR/PR at Table IV-21.

[157] CR/PR at Table IV-21.

[158] The market share of nonsubject imports rose from *** percent in 2013 to *** percent in 2014.

[159] Nonsubject imports declined from *** percent in 2014 to *** percent in 2015. CR/PR at Table IV-21.

[160] Japanese Respondents Prehearing Brief at 11-20, POSCO Prehearing Brief at 21-24.

[161] *See*, *e.g.*, Japanese Respondents' Prehearing Brief at 16.

[162] CR at II-26, PR at II-17.

application of the methodologies advocated by these respondents would require that we also lag some proportion of the shipment data of domestic producers by undetermined amounts of time.

Respondents also argue that the increase in subject import volume and market share from 2013 to 2014, when demand increased, cannot be considered to be significant because the shipments of almost all U.S. producers increased in this period, and, notwithstanding the domestic industry's capacity utilization rate of 74.1 percent, U.S. producers' actual capacity was "not necessarily aligned with the composition of demand" and the domestic industry experienced supply constraints.[163] We are not persuaded by these arguments. Representatives of the domestic industry testified that domestic producers had excess capacity in 2014.[164] Most purchasers responding to the Commission's questionnaire reported that they did not experience any supply constraints from domestic suppliers and the amount of subject imports purchased because of these constraints is uncertain.[165] In some instances these supply constraints were associated with specific domestic producers and there is no evidence that other domestic producers were affected by the same supply constraints.[166] Furthermore, two of the reported supply constraints relate, implicitly or explicitly, to parts of the period of investigation other than 2014.[167]

In short, we find that any supply constraints experienced by the domestic industry in 2014 cannot explain the magnitude of the *** short ton increase in subject import volume between 2013 and 2014.[168] The domestic industry's capacity utilization rate of 74.1 percent in

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[163] Japanese Respondents Prehearing Brief at 21-23 and Posthearing Brief, Exh. 1 at 6-12, POSCO Prehearing Brief at 12-21, French and German Respondents Prehearing Brief at 12-21.

[164] Hearing Tr. at 53 (Whiteman/Nucor) and 69 (Moskaluk/SSAB).

[165] Of the 87 purchasers addressing this question, a distinct minority -- only 26 firms -- reported experiencing supply constraints from domestic suppliers during the period of investigation . *See* CR/PR at Table D-1. Respondents assert that purchasers representing *** percent of total reported subject import purchases over the period of investigation, and *** percent of the total increase in purchases of subject imports from 2013 to 2014, reported some form of supply constraint from domestic producers. Japanese Respondents' Final Comments at 13. There is, however, no evidence that all – or even a significant amount – of the subject imports by these purchasers were associated with specific supply constraints of domestic producers. Moreover, 13 of the purchasers that reported some form of supply constraint with domestic producers also reported that they switched from domestic supply to subject supply for price reasons. *See* Purchaser Questionnaire Responses at III-14 and III-36.

[166] The responses of *** identify specific domestic producers or refer to "certain" domestic producers. CR at D-8, D-12, D-26, D-27, and D-29, PR at D-3.

[167] *** response addresses the alleged inability of domestic producers to supply certain types of X-70 CTL plate, without specifying any particular part of the period of investigation. CR at D-6, PR at D-3. Given that subject imports of X-70 CTL plate were at relatively low levels in 2014 (*see* CR/PR at Table IV-13), supply constraints experienced by Berg Steel Pipe Corp. relating to X-70 CTL plate would not have been particularly relevant to the question of the domestic industry's ability to supply the market in 2014. The supply constraints reported by *** relate to events in 2016. CR at D-27, PR at D-3.

[168] *See* CR/PR at Table IV-2. In 2014, purchasers who reported constraints with respect to certain specifications or delays/extended delivery times associated with domestic suppliers accounted for 1,288,528 short tons of CTL plate purchases in total. Of these purchases, 983,863 were made from (Continued...)

2014[169] does not suggest that the industry was incapable of supplying at least a significant share of the market that subject imports captured in 2014 and largely retained thereafter.

We have also considered respondents' argument that because the domestic industry allegedly cannot supply X-70 CTL plate to the dimensions and specifications often required by purchasers, the volume of subject imports should be evaluated after subtracting imports of X-70 CTL plate. When viewed in this way, the volume of subject imports followed trends in demand and declined in 2015 and between the interim periods, according to these respondents.[170] We are also not persuaded by this argument. The record contains voluminous and conflicting information on the question of whether domestic producers would have been able to supply X-70 CTL plate to the domestic purchasers of that product (principally to Berg Steel Pipe Corp., the *** importer of that product during the period of investigation) in the dimensions and to the specifications often required by those purchasers. It is not necessary for us to resolve this issue because even assuming *arguendo* that such a methodology was permissible under the statute,[171] and that the domestic industry could not have supplied any of the X-70 CTL plate that was imported from subject sources – as discussed below, the record does not support such a factual assumption – the volume of cumulated subject imports other than X-70 CTL plate still rose dramatically both in absolute terms and relative to consumption in the United States from 2013 to 2015.[172] Moreover, the record in these investigations does not support a conclusion that the domestic industry could not have supplied any of the X-70 CTL plate that was imported from subject sources. For example, the record shows that ***,[173] and that during the period of investigation ***.[174] This suggests that *** could have supplied at least some of the volumes awarded to ***.

(…Continued)
domestic producers, 220,473 were from subject imports, and the rest from nonsubject or unknown sources. *See* Purchaser Questionnaire Responses at II-1 and III-14. Even assuming *arguendo* that all purchases of subject imports made by purchasers reporting such supply constraints were attributable to these constraints, this explains only a minority of the increase in subject imports in 2014.

[169] CR/PR at Table III-5.

[170] Japanese Respondents Prehearing Brief at 10 and Posthearing Brief at 4-5, POSCO Prehearing Brief at 27-29, French and German Respondents Prehearing Brief at 10-12 and 21.

[171] The statute contemplates that the Commission will consider "the volume of imports of the subject merchandise." 19 U.S.C. §1677(7)(B)(i)(I). The "subject merchandise" here is all CTL plate described in Commerce's scope definition.

[172] Net of subject imports of X-70 CTL plate, cumulated subject imports increased from *** short tons in 2013 to *** short tons in 2014, declined to *** short tons in 2015, and were *** short tons in interim 2015 and *** short tons in interim 2016. Derived from CR/PR at Tables IV-2 and IV-13. The market share of subject imports net of X-70 CTL plate rose from *** percent in 2013 to *** percent in 2014, declined to *** percent in 2015, and was *** percent in interim 2015 and *** percent in interim 2016. Derived from CR/PR at Tables IV-13 and IV-21.

[173] AMUSA Posthearing Brief, Exh. 1 at 32-34, and Exh. 8.

[174] CR/PR at Table V-15.

Based on the foregoing, we find that the cumulated volume of subject imports, and the increase in that volume, are significant in absolute terms and relative to consumption in the United States.

D. Price Effects of the Subject Imports

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

> (I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and
>
> (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.[175]

As explained in Section V.B.3. above, the record indicates that there is a moderate-to-high degree of substitutability between domestically produced CTL plate and CTL plate imported from subject sources of the same or similar specifications, and that price is an important factor in purchasing decisions.

The Commission collected quarterly pricing data on six pricing products.[176] Ten U.S. producers and 43 importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.[177]

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[175] 19 U.S.C. § 1677(7)(C)(ii).

[176] The pricing products were:

Product 1.-- Hot-rolled CTL carbon steel plate, ASTM A-36 or equivalent as rolled, mill edge, not heat treated, not cleaned or oiled, in cut lengths, 72" through 96" in width, 0.250" thick;

Product 2.-- Hot-rolled CTL carbon steel plate, ASTM A-36 or equivalent as rolled, mill edge, not heat treated, not cleaned or oiled, in cut lengths, 72" through 96" in width, 0.3125" thick;

Product 3.-- Hot-rolled CTL carbon steel plate, ASTM A-36 or equivalent as rolled, mill edge, not heat treated, not cleaned or oiled, in cut lengths, 72" through 120" in width, 0.375" through 3.00" in thickness;

Product 4.-- Hot-rolled CTL carbon steel plate, high strength low alloy (HSLA), ASTM A-572, Grade 50, mill edge, not cleaned or oiled, in cut lengths, 72" through 120" in width, 0.5" through 1.5" in thickness;

Product 5.-- Hot-rolled CTL carbon steel plate, API X-70 or equivalent as rolled, mill or cut edge, not heat treated, not cleaned or oiled, in cut lengths, 72" through 152" in width, 0.375" through 1.0" thick; and

Product 6.-- Hot-rolled CTL plate, AISI A2 or equivalent as rolled, mill edge, annealed, descaled, in random lengths from 73"-144", 20"-41" in width and from 0.187" through 3.5" thick.

CR at V-8, PR at V-6.

[177] CR at V-9, PR at V-7. Reported pricing products represented 34.4 percent of U.S. producers' U.S. commercial shipments of CTL plate in 2015, 3.1 percent of imports from Austria, 15.4 percent of imports from Belgium, 55.3 percent of imports from Brazil, 1.3 percent of imports from China, 0.6 (Continued...)

The quarterly pricing data show that the subject imports undersold the domestic like product in 193 of 371 possible comparisons (involving 747,331 short tons) and oversold the domestic like product in the remaining 178 instances (involving 280,632 short tons).[178] Underselling was particularly prevalent in 2014, the year in which subject import volume and market share grew by the largest amounts in the period of investigation.[179] The margins of underselling ranged from less than 0.1 percent to 28.6 percent, and the average margin of underselling was 9.3 percent.[180] Given the high frequency of underselling and the fact that price is an important consideration in purchasing decisions, we find the underselling to be significant.

Purchasers also confirmed shifting from the domestic like product to subject imports due to their lower prices.[181] The aggregate tonnage involved in these shifts to subject imports, 618,362 short tons, is larger than the increase in subject imports between 2013 and 2015, which was *** short tons.[182]

We do not find that cumulated subject imports depressed U.S. producers' prices to a significant degree.[183] The pricing data indicate generally that prices for the domestic like

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(…Continued)
percent of imports from France, less than 0.1 percent of imports from Germany, 53.0 percent of imports from Italy, 43.3 percent of imports from Japan, 54.1 percent of imports from Korea, 50.2 percent of imports from South Africa, 28.2 percent of imports from Taiwan, and 81.0 percent of imports from Turkey. CR at V-9, PR at V-7.

[178] CR at V-34, PR at V-21, CR/PR at Tables V-11 and V-12.

[179] In that year, subject imports undersold the domestic like product in 76 of 111 possible comparisons (involving 444,935 short tons) and oversold the domestic like product in the remaining 35 instances (involving 21,071 short tons). CR/PR at Table V-13.

[180] CR at V-34, PR at V-21 and CR/PR at Table V-11.

[181] Sixty-four of 82 purchasers responding to the Commission's questionnaire reported that they had shifted purchases of CTL plate from the domestic like product to subject imports since 2013, and 35 of those purchasers reported that the price was a primary reason for purchasing product from at least one subject country instead of U.S.-produced CTL plate. In total, these purchases accounted for 618,362 short tons of CTL plate. CR at V-45, PR at V-28, and CR/PR at Table V-15. Subject imports from each of the twelve subject countries were involved in these shifts by purchasers. CR/PR at Table V-16.

[182] *See* CR/PR at Table IV-2.

[183] Chairman Schmidtlein finds that the subject imports depressed prices for the domestic like product to a significant degree. The domestic industry's prices for products 1-4 initially increased from 2013 to 2014 before starting to decline in the fourth quarter of 2014 (import data for products 5 and 6 were limited). This decline continued throughout 2015 and the first quarter of 2016; prices fell by 4.5 to 15.4 percent in nearly every quarter during that period. Over the full period of investigation, prices for these four products fell by 11.7 to 18.6 percent. CR at V-31-32, PR at V-19.

These price declines occurred while subject imports were continuing the increase by volume and market share that started in 2013 (reaching a market share of *** percent in 2015). As noted above, the domestic industry lost 7.7 percentage points of market share in 2014. The significant underselling that year allowed the subject imports to gain *** of market share in one year, increasing from *** percent in 2013 to *** percent in 2014. The industry responded in 2015 by dropping its prices. In (Continued...)

product increased from 2013 to 2014, and then declined in 2015 and the first quarter of 2016, before recovering somewhat in the second and third quarters of 2016.[184] These price declines in 2015 and the first quarter of 2016, however, occurred at the same time as substantial declines in demand for CTL plate[185] along with substantial declines in the prices for coal, carbon steel scrap, and hot-rolled coil, three of the four primary raw materials used in the production of CTL plate.[186] In light of these considerations, the record in the final phase of these investigations does not support a conclusion that the decline in prices for the domestic like product has been as a result of cumulated subject imports rather than other factors.

We also do not find that cumulated subject imports prevented price increases for the domestic like product that otherwise would have occurred to a significant degree. The domestic industry's ratio of cost of goods sold ("COGS") to net sales declined from 95.0 percent in 2013 to 89.5 percent in 2014.[187] Thus, the domestic industry was more than able to recover any increasing costs in 2014. While the domestic industry's ratio of COGS to net sales increased from 89.5 percent in 2014 to 95.3 percent in 2015, and was 93.9 percent in interim

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(…Continued)
doing so, the domestic industry was able to stem the loss of market share (US producers maintained their share at 82.1 percent in 2015) even as apparent consumption fell dramatically by 16.6 percent.

In addition to the declines reflected in the pricing products, Chairman Schmidtlein observes that the average unit value of domestic shipments fell from $844 per short ton in 2014 to $691 in 2015, a drop of $153 per ton or 18.1 percent. CR/PR at Table III-7. This decrease exceeded the drop in the industry's unit COGS, which fell from $765 per ton in 2014 to $678 per ton in 2015, a decrease of $87 per ton or 11.3 percent. Thus, the decline in prices cannot be fully explained by the change in raw material costs as argued by respondents (Japanese Respondents Prehearing Brief at 24-26 and Posthearing Brief at 6-7, POSCO Prehearing Brief at 30-32, French and German Respondents Prehearing Brief at 23-25). In addition, total COGS as a ratio to sales increased by 5.7 percentage points further demonstrating that prices were falling faster than costs. CR/PR at Table C-1.

Chairman Schmidtlein also is not persuaded that the decline in demand in 2015 is wholly responsible for the reduction in prices. She notes that the decline in prices as reflected in the pricing products actually began in the fourth quarter of 2014 before demand started to go down. In addition, despite the fact that demand decreased substantially in 2015, the volume of subject imports remained significant at *** short tons (*** percent in 2015) and their market share actually increased that year. In Chairman Schmidtlein's view, the substantial volume of low-priced subject imports in 2015, in a price-sensitive market, exerted downward pressure on the industry's prices causing US producers to reduce prices in order to maintain their share.

[184] CR/PR at Tables V-3 to V-8.

[185] Apparent U.S. consumption declined by 16.6 percent from 2014 to 2015, and was 9.8 percent lower in interim 2016 than in interim 2015. CR/PR at Tables C-1.

[186] Between January 2014 and the end of March 2016 prices for coal, carbon steel scrap, hot-rolled coil, and iron ore decreased by 4, 38, 27, and 17 percent, respectively. *See* CR/PR at Figure V-1. U.S. producers' cost of raw materials decreased from $479 per short ton in 2014 to $387 per short ton in 2015, and were $313 per short ton in interim 2016 as compared with $402 per short ton in interim 2015. CR/PR at Table VI-1.

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

2016 compared to 92.9 percent in interim 2015, price increases were unlikely in 2015 and interim 2016 in light of declines in both apparent consumption and unit COGS.

We have considered respondents' argument that the underselling by subject imports in 2014 was not significant because the underselling was a result of domestic producers being able to raise their prices more rapidly than importers.[188] The record indicates that most sales of CTL plate by domestic and subject producers occurred in the spot market.[189] There is no reason to believe that prices are not communicated among participants in this market. Indeed, the record shows that a significant number of purchasers shifted a substantial amount of tonnage from domestic suppliers to subject imports.[190] Under these circumstances we do not find that the underselling by subject imports in 2014 was any less significant because the prices of the imports were following domestic prices on the way up.[191]

Accordingly, we find that subject imports significantly undersold the domestic like product. As a result of this underselling, the subject imports gained market share at the expense of the domestic industry, as described in section V.C. above. The low-priced cumulated subject imports consequently had significant effects on the domestic industry, which are described further below.

[188] Japanese Respondents Prehearing Brief at 29 and 37-41 and Posthearing Brief at 8, POSCO Prehearing Brief at 34-36, French and German Respondents Prehearing Brief at 28-30.

[189] CR/PR at Table V-2. These data are for shipments in 2015, but the record does not indicate that conditions of competition in this respect were appreciably different in 2014.

[190] CR/PR at Table V-15.

[191] We also have considered respondents' suggestion that the underselling by subject imports might have been attributable to the willingness of purchasers to pay a premium for the domestic product, due to its proximity and shorter lead times. Japanese Respondents' Prehearing Brief at 38. There is no evidence on the record of these investigations that purchasers were willing to pay such a premium; on the contrary, the majority of purchasers (48 of 85) reported that they "usually" purchase the lowest-price product. CR at II-28, PR at II-19. Moreover, that appreciable numbers of purchasers indicated that they shifted purchases from domestic to subject sources because of pricing also undercuts respondents' argument.

E. Impact of the Subject Imports[192]

Section 771(7)(C)(iii) of the Tariff Act provides that examining the impact of subject imports, the Commission "shall evaluate all relevant economic factors which have a bearing on the state of the industry."[193] These factors include output, sales, inventories, capacity

[192] The statute instructs the Commission to consider the "magnitude of the dumping margin" in an antidumping proceeding as part of its consideration of the impact of imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final determinations of sales at less value Commerce found antidumping duty margins of 74.52 percent for imports from all sources in Brazil, 87.72 to 94.14 percent for imports from South Africa, and 42.02 to 50.0 percent for imports from Turkey. *Certain Carbon and Alloy Steel Cut-to-Length Plate From Brazil, South Africa, and the Republic of Turkey: Affirmative Final Determinations of Sales at Less Than Fair Value and Affirmative Final Determinations of Critical Circumstances for Brazil and the Republic of Turkey*, 81 FR 87544, 87545 (Dec. 5, 2016). For the remaining investigations we refer, as the statute instructs, to Commerce's preliminary margins. *See* 19 U.S.C. § 1677(35)(C)(ii). Commerce calculated the following preliminary margins for those investigations: 41.97 percent for imports from all sources in Austria, 2.41 to 8.98 percent for imports from Belgium, 68.27 percent for imports from all sources in China, 4.26 to 6.43 percent for imports from France, 5.00 to 6.56 percent for imports from Germany, 6.10 to 130.63 percent for imports from Italy, 14.96 to 48.64 percent for imports from Japan, 6.82 for imports from POSCO in Korea, and 3.51 to 28.00 percent for imports from Taiwan. *Certain Carbon and Alloy Steel Cut-To-Length Plate From Austria: Preliminary Determination of Sales at Less Than Fair Value and Postponement of the Final Determination,* 81 FR 79416 (Nov. 14, 2016); *Certain Carbon and Alloy Steel Cut-To-Length Plate From Belgium: Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination,* 81 FR 79431 (Nov. 14, 2016); *Certain Carbon and Alloy Steel Cut-To-Length Plate from the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value,* 81 FR 79450 (Nov. 14, 2016); *Certain Carbon and Alloy Steel Cut-To-Length Plate From France: Amended Preliminary Determination of Sales at Less Than Fair Value*, 81 FR 87019 (Dec. 2, 2016); *Certain Carbon and Alloy Steel Cut-To-Length Plate From the Federal Republic of Germany: Amended Preliminary Determination of Sales at Less Than Fair Value,* 81 FR 85930 (Nov. 29, 2016); *Certain Carbon and Alloy Steel Cut-To-Length Plate From Italy: Preliminary Determination of Sales at Less Than Fair Value, Affirmative Determination of Critical Circumstances, and Postponement of Final Determination,* 81 FR 79423 (Nov. 14, 2016); *Certain Carbon and Alloy Steel Cut-To-Length Plate From Japan: Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination,* 81 FR 79427 (Nov. 14, 2016); *Certain Carbon and Alloy Steel Cut-To-Length Plate From the Republic of Korea: Affirmative Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination,* 81 FR 79441 (Nov. 14, 2016); and *Certain Carbon and Alloy Steel Cut-To-Length Plate From Taiwan: Preliminary Determination of Sales at Less Than Fair Value,* 81 FR 79420, (Nov. 14, 2016). We take into account in our analysis the fact that Commerce has made preliminary or final findings that producers in each of the subject countries are selling subject imports in the United States at less than fair value. In addition to this consideration, our impact analysis has considered other factors affecting domestic prices. Our analysis of the significant underselling of the cumulated subject imports and the effects of that underselling, described in both the price effects discussion and below, is particularly probative to an assessment of the impact of the subject imports.

[193] 19 U.S.C. § 1677(7)(C)(iii); *see also* SAA at 851 and 885 ("In material injury determinations, the Commission considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they also (Continued...)

utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debts, research and development, and factors affecting domestic prices. No single factor is dispositive and all relevant factors are considered "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[194]

We find that the cumulated subject imports had a significant impact on the domestic industry during the period of investigation. From 2013 to 2014, when apparent U.S. consumption had robust growth of 1.1 million short tons (12.6 percent),[195] the domestic industry's shipments grew only modestly by 235,852 short tons, or 3.0 percent.[196] Subject imports, which pervasively undersold the domestic like product in 2014, captured much of this growth in apparent U.S. consumption and gained significant market share.[197] [198] As a result, in many respects the domestic industry did not perform as well as would have been expected during the 2013-2014 time of growing demand. In 2015, when demand collapsed, the volume and market share of subject imports remained elevated, while the domestic industry's production, shipments, revenues, and financial performance all fell sharply, as explained below.[199]

The domestic industry's capacity declined from 12.9 million short tons in 2013 to 12.5 million short tons in 2014, remained at that level in 2015, and was 9.3 million short tons in both interim 2015 and interim 2016.[200] Production increased from 8.6 million short tons in 2013 to 9.2 million short tons in 2014, declined to 7.5 million short tons in 2015, and was 6.0 million short tons in interim 2015 and 5.5 million short tons in interim 2016.[201] Capacity utilization

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(…Continued)
may demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.").

[194] 19 U.S.C. § 1677(7)(C)(iii). This provision was amended by the Trade Preferences Extension Act of 2015, Pub. L. 114-27.

[195] CR/PR at Table C-1.

[196] The domestic industry's U.S. shipments increased from 7.9 million short tons in 2013 to 8.2 million short tons in 2014. CR/PR at Table III-7.

[197] The market share of cumulated subject imports increased from *** percent in 2013 to *** percent in 2014. CR/PR at Table IV-21. As discussed above, even if all subject imports of X-70 CTL plate are removed from the import data, the market share of subject imports still rose dramatically.

[198] The domestic industry's market share fell from 89.8 percent in 2013 to 82.1 percent in 2014, remained at that level in 2015. CR/PR at Table IV-21.

[199] The domestic industry's U.S. shipments declined to 6.8 million short tons in 2015, and were lower in interim 2016 (5.0 million short tons) than in interim 2015 (5.4 million short tons). CR/PR at Table III-7. Its market share was at 82.1 percent in 2015, 81.3 percent in interim 2015, and 83.6 percent in interim 2016. The market share of cumulated subject imports rose to *** percent in 2015, and was *** percent in interim 2015 and *** percent in interim 2016. CR/PR at Table IV-21.

[200] CR/PR at Table III-5.

[201] CR/PR at Table III-5.

increased from 66.4 percent in 2013 to 74.1 percent in 2014, declined to 60.3 percent in 2015, and was 64.0 percent in interim 2015 and 59.3 percent in interim 2016.[202]

The number of production workers fluctuated between years but increased slightly (by 0.3 percent) from 2013 to 2015.[203] Hours worked and wages paid fluctuated between years but declined from 2013 to 2015, by 3.1 percent in both cases.[204] Productivity also fluctuated between years but declined from 2013 to 2015, by 9.3 percent.[205]

The domestic industry's sales revenues rose from 2013 to 2014, as sales quantities and net unit sales values both increased, and declined from 2014 to 2015, when sales quantities and net unit sales values both decreased. Sales revenues were lower in interim 2016 than interim 2015, again reflecting reductions in both sales quantities and unit sales values.[206] The value of COGS displayed similar trends to sales revenues.[207] Gross profit, operating income, and net income all rose from 2013 to 2014, but then fell sharply in 2015.[208] [209] The industry's ratio of operating income to net sales also increased from 2013 to 2014 before declining sharply in 2015.[210] The industry's capital expenditures fluctuated over the 2013-15 period, and were

[202] CR/PR at Table III-5. The domestic industry's end-of-period inventories rose from 9.5 percent of total shipments in 2013 to 11.0 percent in 2014 and 12.0 percent in 2015, and were 11.4 percent in interim 2015 and 10.7 percent in interim 2016. CR/PR at Table III-8.

[203] CR/PR at Table C-1. The number of production workers and wages paid were lower in interim 2016 than in interim 2015. CR/PR at Table III-11.

[204] CR/PR at Table C-1. Hours worked and wages paid were lower in interim 2016 than in interim 2015. CR/PR at Table III-11.

[205] CR/PR at Table C-1. Productivity was higher in interim 2016 than in interim 2015. CR/PR at Table III-11.

[206] Sales revenues were $5.9 billion in 2013, $6.7 billion in 2014, $4.7 billion in 2015, $3.8 billion in interim 2015, and $2.9 billion in interim 2016. CR/PR at Table VI-1. The industry's average unit net sales values were $788 per short ton in 2013, $854 per short ton in 2014, $712 per short ton in 2015, $739 per short ton in interim 2015 and $601 per short ton in interim 2016. *Id.*

[207] Total COGS was $5.6 billion in 2013, $6.0 billion in 2014, $4.5 billion in 2015, $3.5 billion in interim 2015, and $2.8 billion in interim 2016. CR/PR at Table VI-1.

[208] Gross profit was $299.0 million in 2013, $700.9 million in 2014, $220.8 million in 2015, $269.5 million in interim 2015, and $178.0 million in interim 2016. Operating income was $90.3 million in 2013, $495.5 million in 2014, $22.5 million in 2015, $112.7 million in interim 2015, and $35.8 million in interim 2016. The industry recorded a net loss of $122.0 million in 2013, net income of $306.5 million in 2014, a net loss of $409.1 million in 2015, a net loss of $20.6 million in interim 2015, and a net loss of $100.2 million in interim 2016. CR/PR at Table VI-1.

[209] Respondents argue that a part of the domestic industry's lower operating margin in 2015 is attributable to ***, and not to any adverse impact by subject imports. Japanese Respondents Prehearing Brief at 51-52. While the *** were not necessarily directly related to subject imports, these *** were allocated in part to CTL plate by reasonable methods.

[210] The domestic industry's ratio of operating income to net sales was 1.5 percent in 2013, 7.4 percent in 2014, 0.5 percent 2015, 3.0 percent in interim 2015 and 1.2 percent in interim 2016. CR/PR at Table VI-1.

almost unchanged in 2015 as compared with 2013. Its research and development ("R&D") expenditures also fluctuated but were lower in 2015 than in 2013.[211]

Through pervasive underselling, subject imports increased their volume and market share in 2014, and their market share continued to increase in 2015 while their volume declined only slightly.[212] Subject imports gained market share during the period of investigation at the expense of the domestic industry, which experienced only modest growth in shipments in 2014 despite robust growth in apparent U.S. consumption during that year. In 2015, while subject imports remained in the market at elevated levels, the domestic industry's production, shipments, and sales revenues all declined and the domestic industry's net sales values fell to a greater extent than its costs, leading to reduced profitability for the industry. Because the domestic industry, despite having the ability to increase its production and shipments,[213] was unable to increase its shipments more significantly as demand grew in 2014, or to regain in 2015 any of the market share that it had lost, mainly to subject imports, in 2014, it lost revenues that it otherwise would have obtained. These lost revenues were reflected in the industry's generally poor financial performance in 2015. The generally poor financial performance persisted in interim 2016, when the domestic industry's market share, despite some gains, remained below 2013 levels. We accordingly find that the significant volume of cumulated subject imports, which gained market share at the expense of the domestic industry through significant underselling, had a significant impact on the domestic industry.[214]

We are not persuaded by respondents' argument that there was a lack of correlation between the increase in subject imports in 2014 and deterioration in the domestic industry's condition in 2015.[215] As discussed above, in 2014, despite robust growth in demand, the domestic industry experienced only modest gains in shipments and lost substantial market share to subject imports. After increasing sharply in 2014, at a rate that was much faster than the rate of increase in demand, subject imports remained in the U.S. market at elevated levels in 2015, depriving the domestic industry of market share, at a time when the domestic industry's performance was substantially worse for most indicators in 2015 than in 2014.

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[211] The domestic industry's capital expenditures were $121.6 million in 2013, $169.2 million in 2014, $122.0 million in 2015, $84.6 million in interim 2015, and $74.0 million in interim 2016. CR/PR at Table VI-5. The industry's R&D expenses were $*** in 2013, $*** in 2014, $*** in 2015, $*** in interim 2015, and $*** in interim 2016. *Id.*

[212] As noted above, if the volume and market share data are assessed net of subject imports of X-70 CTL plate, the volume and market share of subject imports declined in 2015 but remained at substantially elevated levels, in comparison to 2013.

[213] The industry had appreciable excess capacity throughout the period of investigation, indicating it had the ability to increase production, and its capacity utilization declined overall in the 2013-2015 period. *See* CR/PR at Table III-5.

[214] Chairman Schmidtlein also finds that subject imports significantly depressed U.S. prices during the POI. In her view, the depressed prices, along with the lower sales volume, resulted in a significant adverse impact on the domestic industry's financial performance and overall operating performance in the later portion of the POI.

[215] Japanese Respondents Prehearing Brief at 51-55, POSCO Prehearing Brief at 44-56, German/French Respondents Prehearing Brief at 31-35.

We are also not persuaded by respondents' argument that underselling by subject imports did not cause material injury because most of the quantity involved was concentrated in 2014, the year in which the domestic industry experienced its best performance during the period of investigation.[216] As described above, the underselling allowed subject imports to gain significant market share at the expense of the domestic industry in 2014 – market share which grew further in 2015, when demand for CTL plate declined sharply.[217]

We have considered whether there are other factors that may have had an impact on the domestic industry during the period of investigation to ensure that we are not attributing injury from such other factors to subject imports. Nonsubject imports as a share of apparent U.S. consumption increased from *** percent in 2013 to *** percent in 2014 and declined to *** percent in 2015.[218] Canada accounted for the majority of nonsubject imports during the POI.[219] Nonsubject imports cannot explain the magnitude of the domestic industry's loss of market share and revenues due to underselling by subject imports. The increase in the volume of nonsubject imports occurred at a lower rate than that of subject imports,[220] and the gain in market share by nonsubject imports over the POI (*** percentage points) was less than that of subject imports (*** percentage points or *** percentage points based on data net subject imports of X-70 CTL plate).[221]

We also considered the decline in demand for CTL plate after 2014. As previously discussed, because of the continued elevated level of subject imports, the domestic industry was unable to obtain the market share it achieved in 2013 at any subsequent time during the period of investigation. Consequently, declining demand cannot explain the magnitude of the domestic industry's decline in output and shipments over the POI. Thus, other factors cannot explain the loss in market share, output, and revenues that we have attributed to the cumulated subject imports. We therefore conclude that the subject imports had a significant impact on the domestic CTL plate industry.

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[216] Japanese Respondents Prehearing Brief at 29 and 37-41 and Posthearing Brief at 8, POSCO Prehearing Brief at 34-36, French and German Respondents Prehearing Brief at 28-30.

[217] Consistent with their increase in market share in 2014, subject imports increased sharply at the end of 2014; subject import volume was 407,729 short tons in the last quarter of 2014 compared to 135,425 short tons in the last quarter of 2013. CR/PR at Table E-1.

[218] CR/PR at Table IV-21 and CR at VII-103, PR at VII-59.

[219] CR/PR at Table IV-3. The limited pricing data obtained for nonsubject imports (from 13 importers involving imports from Canada and Mexico) show that nonsubject imports from Canada were generally priced higher than the domestic like product and subject imports during the POI, and subject imports from Mexico were generally priced lower. CR/PR at F-3.

[220] Subject imports rose by *** percent from 2013-15, while nonsubject imports rose by *** percent. CR/PR at Table C-1, and derived from CR/PR at Tables IV-2 and IV-13.

[221] Commissioners Pinkert and Kieff do not undertake a *Bratsk/Mittal Steel* analysis in these investigations, because nonsubject imports did not maintain a significant share of the U.S. market during the period of investigation, especially when compared to the market share of the subject imports.

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of subject imports of CTL plate from Brazil, South Africa, and Turkey that are sold in the United States at less than fair value.

VI. Critical Circumstances

A. Legal Standards and Party Arguments

In its final antidumping duty determinations concerning CTL plate from Brazil and Turkey, Commerce found that critical circumstances exist with respect to all producers in those countries. Because we have determined that the domestic industry is materially injured by reason of subject imports from Brazil and Turkey, we must further determine "whether the imports subject to the affirmative {Commerce critical circumstances} determination ... are likely to undermine seriously the remedial effect of the antidumping {and/or countervailing duty} order{s} to be issued."[222] The SAA indicates that the Commission is to determine "whether, by massively increasing imports prior to the effective date of relief, the importers have seriously undermined the remedial effect of the order" and specifically "whether the surge in imports prior to the suspension of liquidation, rather than the failure to provide retroactive relief, is likely to seriously undermine the remedial effect of the order."[223] The legislative history for the critical circumstances provision indicates that the provision was designed "to deter exporters whose merchandise is subject to an investigation from circumventing the intent of the law by increasing their exports to the United States during the period between initiation of an investigation and a preliminary determination by {Commerce}."[224] An affirmative critical circumstances determination by the Commission, in conjunction with an affirmative determination of material injury by reason of subject imports, would normally result in the retroactive imposition of duties for those imports subject to the affirmative Commerce critical circumstances determination for a period 90 days prior to the suspension of liquidation.

The statute provides that, in making this determination, the Commission shall consider, among other factors it considers relevant,

(I) the timing and the volume of the imports,

(II) a rapid increase in inventories of the imports, and

(III) any other circumstances indicating that the remedial effect of the {order} will be seriously undermined.[225]

In considering the timing and volume of subject imports, the Commission's practice is to consider import quantities prior to the filing of the petition with those subsequent to the filing

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[222] 19 U.S.C. §§ 1671d(b)(4)(A)(ii), 1673d(b)(4)(A)(ii).

[223] SAA at 877.

[224] *ICC Industries, Inc. v United States,* 812 F.2d 694, 700 (Fed. Cir. 1987), *quoting* H.R. Rep. No. 96-317 at 63 (1979), *aff'g* 632 F. Supp. 36 (Ct. Int'l Trade 1986). *See* 19 U.S.C. §§ 1671b(e)(2), 1673b(e)(2).

[225] 19 U.S.C. §§ 1671d(b)(4)(A)(ii), 1673d(b)(4)(A)(ii).

of the petition using monthly statistics on the record regarding those firms for which Commerce has made an affirmative critical circumstances determination.[226]

Petitioners' Arguments. Petitioners argue that the Commission should make an affirmative critical circumstances finding with respect to subject imports from Brazil and Turkey. Petitioners argue that the Commission should follow its normal practice of comparing imports in the six-month periods preceding and succeeding the filing of the petition, as there are no special circumstances in these investigations that would warrant using different periods. Petitioners argue that in the six-month post-petition period, the increase in subject imports was 103.9 percent for imports from Turkey. For imports from Brazil, Petitioners do not address the data in the six-month periods, but instead note that imports were higher in the three-month post-petition period compared to the prior three months. Petitioners argue that the Commission should not discount import volumes from any particular country on the basis that they are "small" relative to U.S. production, shipments, or consumption. Petitioners further argue that end-of-period inventories of subject imports from Turkey doubled between September 2015 and September 2016.[227]

Respondents' Arguments: Erdemir argues that subject imports from Turkey in the six months following the filing of the petition accounted for only 0.3 percent of U.S. consumption and thus can hardly be considered to be "massive," and inventories of CTL plate in September 2016 were very low. Accordingly, Erdemir urges the Commission to make a negative critical circumstances determination with respect to CTL plate from Turkey.[228]

Stemcor argues that critical circumstances do not exist with respect to subject imports from Turkey. Stemcor argues that, although import volume increased in the six months after the filing of the petition, the volume of imports involved is too small to affect the domestic industry or undermine the effectiveness of any order. Inventories of subject imports from Turkey also are too small to undermine the effectiveness of any order.[229] Stemcor also argues that because production lead times for CTL plate are typically three to six months, imports in the three to six months after the filing of the petition were likely pursuant to contracts that pre-dated the filing of the petition, and these imports do not indicate any attempt to accelerate shipments.[230]

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[226] *See Lined Paper School Supplies from China, India, and Indonesia,* Inv. Nos. 701-TA-442-43, 731-TA-1095-97**,** USITC Pub. 3884 at 46-48 (Sept. 2006); *Carbazole Violet Pigment from China and India,* Inv*.* Nos. 701-TA-437 and 731-TA-1060-61 (Final), USITC Pub. 3744 at 26 (Dec. 2004); *Certain Frozen Fish Fillets from Vietnam,* Inv. No. 731-TA-1012 (Final), USITC Pub. 3617 at 20-22 (Aug. 2003).

[227] AMUSA Prehearing Brief at 76-82, AMUSA Posthearing Brief, Exh. 1 at 85-89.

[228] Erdemir Posthearing Brief at 2-3.

[229] Stemcor Prehearing Brief at 8-9 and Posthearing Brief at 8-10.

[230] Stemcor Prehearing Brief at 9-10.

B. Analysis

1. Choice of Time Period

We first consider the appropriate period for comparison of pre-petition and post-petition levels of subject imports from Brazil and Turkey. In previous investigations, the Commission has relied on a shorter comparison period when Commerce's preliminary determination applicable to the country at issue fell within the six-month post-petition period the Commission typically considers.[231] That situation arises here with respect to Commerce's preliminary antidumping determinations on CTL plate from Brazil and Turkey,[232] and we have thus determined to compare the volume of subject imports five months prior to the filing of the petition with the volume of subject imports five months after the filing of the petition in our critical circumstances analyses regarding subject imports from these countries.[233]

2. Brazil

In its final antidumping duty critical circumstances determination for CTL plate from Brazil, Commerce determined that critical circumstances exist with regard to imports from all producers/exporters in Brazil.[234] The monthly data for subject import volume from Brazil for the five-month periods before and after the filing of the petition show a decline, from 10,959 short tons to 7,078 short tons.[235] End-of-period ("EOP") inventories of imports from Brazil were *** short tons in 2014 and *** short tons in 2015.[236] In light of these declines in imports and inventories, and in the absence of any other circumstances indicating that the remedial effect of the antidumping duty order will be seriously undermined, we make a negative critical

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[231] *Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-547, 731-TA-1291-1297 (Final), USITC Pub. 4638 at 49-50 (Sept. 2016); *Certain Corrosion-Resistance Steel Products from China, India, Italy, Korea, and Taiwan,* Inv. No. 701-TA-534-537 and 731-TA-1274-1278 (Final), USITC Pub. 4630 at 35-40 (July 2016); *Carbon and Certain Steel Wire Rod from China*, Inv. Nos. 701-TA-512, 731-TA-1248 (Final), USITC Pub. 4509 at 25-26 (Jan. 2015) (using five-month periods because preliminary Commerce countervailing duty determination was during the sixth month after the petition).

[232] The petitions in these investigations were filed on April 8, 2016, and Commerce published its preliminary dumping determinations with respect to CTL plate from Brazil and Turkey on September 22, 2016. 81 Fed. Reg. 65337 (Sept. 22, 2016); *see* CR/PR at I-2.

[233] The periods considered are November 2015 through March 2016 and April 2016 through August 2016. We note that use of six-month rather than five-month periods would not have appreciably changed the data that we have used in our analyses, and consequently would not have affected our conclusions.

[234] *Certain Carbon and Alloy Steel Cut-to-Length Plate From Brazil, South Africa, and the Republic of Turkey: Affirmative Final Determinations of Sales at Less Than Fair Value and Affirmative Final Determinations of Critical Circumstances for Brazil and the Republic of Turkey*, 81 FR 87544 (Dec. 5, 2016).

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

[236] CR/PR at Table VII-55.

circumstances determination with regard to subject imports in the antidumping duty investigation of CTL plate from Brazil.

3. Turkey

In its final antidumping duty critical circumstances determination for CTL plate from Turkey, Commerce determined that critical circumstances exist with regard to imports from all producers/exporters in Turkey.[237] The monthly data for subject import volume from Turkey for the five-month periods before and after the filing of the petition show an increase, from 14,385 short tons to 29,351 short tons.[238] EOP inventories of imports from Turkey were *** short tons in 2014 and *** short tons in 2015.[239] Despite the increase in subject imports in the post-petition period, in light of the relatively low absolute tonnage involved, the decline in inventories, and the absence of any other circumstances indicating that the remedial effect of the antidumping duty order will be seriously undermined, we make a negative critical circumstances determination with regard to subject imports in the antidumping duty investigation of CTL plate from Turkey.

VII. Conclusion

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of subject imports of CTL plate from Brazil, South Africa, and Turkey that are sold in the United States at less than fair value.

[237] *Certain Carbon and Alloy Steel Cut-to-Length Plate From Brazil, South Africa, and the Republic of Turkey: Affirmative Final Determinations of Sales at Less Than Fair Value and Affirmative Final Determinations of Critical Circumstances for Brazil and the Republic of Turkey*, 81 FR 87544 (Dec. 5, 2016).

[238] CR/PR at Table IV-12.

[239] CR/PR at Table VII-55.

PART I: INTRODUCTION

BACKGROUND

These investigations result from petitions filed with the U.S. Department of Commerce ("Commerce") and the U.S. International Trade Commission ("USITC" or "Commission") by ArcelorMittal USA LLC (Chicago, Illinois), Nucor Corporation (Charlotte, North Carolina), and SSAB Enterprises, LLC (Lisle, Illinois) on April 8, 2016, alleging that an industry in the United States is materially injured and threatened with material injury by reason of less-than-fair-value ("LTFV") imports of certain carbon and alloy steel cut-to-length plate ("CTL plate")[1] from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey, and subsidized imports from Brazil,[2] China, and Korea. The following tabulation provides information relating to the background of these investigations.[3] [4]

[1] See the section entitled "The Subject Merchandise" in *Part I* of this report for a complete description of the merchandise subject to these investigations.

[2] In the preliminary phase of these investigations, the Commission determined that allegedly subsidized imports of CTL plate from Brazil are negligible and terminated its countervailing duty investigation on such imports.

[3] Pertinent *Federal Register* notices are referenced in app. A, and may be found at the Commission's website (www.usitc.gov).

[4] App. B presents witnesses appearing at the Commission's hearing.

Effective date	Action
April 8, 2016	Petitions filed with Commerce and the Commission; institution of Commission investigation (81 FR 22116, April 14, 2016)
April 28, 2016	Commerce's notices of initiation of its antidumping duty investigations (81 FR 27089, May 5, 2016) and countervailing duty investigations (81 FR 27098, May 5, 2016)
May 23, 2016	Commission's preliminary determinations (81 FR 33705, May 27, 2016)
September 7, 2016	Commerce's preliminary critical circumstances determinations on imports from Austria, Belgium, Brazil, Korea, Taiwan, and Turkey (81 FR 61666)
September 13, 2016	Commerce's preliminary affirmative countervailing duty determination on imports from China and alignment of final determination with final antidumping duty determination (81 FR 62871)
September 14, 2016	Commerce's preliminary negative countervailing duty determination on imports from Korea and alignment of final determination with final antidumping duty determination (81 FR 63168)
September 22, 2016	Commerce's preliminary affirmative antidumping duty determinations on imports from Brazil, South Africa, and Turkey (81 FR 65337)
September 16, 2016	Scheduling of final phase of Commission investigations (81 FR 70440, October 12, 2016)
November 14, 2016	Commerce's preliminary affirmative antidumping duty determinations on imports from Austria (81 FR 79416), Belgium (81 FR 79431), China (81 FR 79450), France (81 FR 79437), Germany (81 FR 79446), Italy (81 FR 79423), Japan (81 FR 79427), Korea (81 FR 79441), and Taiwan (81 FR 79420); Commerce's postponement of final determinations on imports from Austria (81 FR 79416), Belgium (81 FR 79431), France (81 FR 79437), Germany (81 FR 79446), Italy (81 FR 79423), Japan (81 FR 79427), and Korea (81 FR 79441); Commerce's preliminary critical circumstances determination on imports from Italy (81 FR 79423)
November 29, 2016	Commerce's amended preliminary affirmative antidumping duty determination on imports from Germany (81 FR 85930)
November 30, 2016	Commission's hearing
December 2, 2016	Commerce's amended preliminary affirmative antidumping duty determination on imports from France (81 FR 87019)
December 5, 2016	Commerce's final affirmative antidumping duty determinations on imports from Brazil, South Africa, and Turkey, and final affirmative critical circumstances determination on imports from Brazil and Turkey (81 FR 87544)
December 9, 2016	Commerce's corrected amended preliminary affirmative antidumping duty determination on imports from France (81 FR 90780, December 15, 2016)
January 6, 2017	Commission's vote (Brazil, South Africa, Turkey)
January 19, 2017	Commission's views (Brazil, South Africa, Turkey)
January 30, 2017	Scheduled date for Commerce's final determination on imports from China
March 20, 2017	Scheduled date for Commerce's final determinations on imports from Austria, Belgium, France, Germany, Italy, Japan, Korea, and Taiwan
Pending	Commission's vote (China)
Pending	Commission's vote (Austria, Belgium, France, Germany, Italy, Japan, Korea, and Taiwan)

STATUTORY CRITERIA AND ORGANIZATION OF THE REPORT

Statutory criteria

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

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

Section 771(7)(C) of the Act (19 U.S.C. § 1677(7)(C)) further provides that--[5]

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

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

domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and (V) in {an antidumping investigation}, the magnitude of the margin of dumping.

In addition, Section 771(7)(J) of the Act (19 U.S.C. § 1677(7)(J)) provides that—[6]

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

Organization of report

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

MARKET SUMMARY

CTL plate is thick, flat-rolled steel used in a wide variety of applications including welded load-bearing and structural applications. These applications include buildings or bridgework; transmission towers and light poles; agricultural, construction, and mining equipment; machine parts and tooling; heavy transportation equipment like ships, rail cars, tankers, and barges; and large diameter line pipe.[7] The leading U.S. producers of CTL plate are SSAB Enterprises LLC ("SSAB"), Nucor Corp. ("Nucor"), and ArcelorMittal USA. These firms responded to the Commission's U.S. producer questionnaire in this proceeding.[8]

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

[7] Petition, Vol. I, p. 17; conference transcript, p. 23 (Insetta).

[8] Petition, Vol. I, exh. I-1 and I-2. Other U.S. producers that responded to the Commission's questionnaire include Commercial Metals Company ("CMC"), EVRAZ NA ("EVRAZ"), Gerdau Ameristeel ("Gerdau"), JSW Steel ("JSW"), Niagara Specialty Metals ("Niagara"), and Universal Stainless and Alloy Products Inc. ("Universal Stainless"). Additional firms that are believed to have the capacity to produce CTL plate include All Metals & Forge Group ("All Metals"), Anderson Schumaker Company ("Anderson"), Carpenter Technologies Corporation ("Carpenter"), Composite Forgings Ltd. ("Composite Forgings"), Crucible, EDRO, Ellwood, Finkl, Optima Specialty Steel, Inc. ("Optima"), and U.S. Steel Corporation ("U.S. Steel"). The Commission also received U.S. producer questionnaire responses from the following U.S.

(*continued*...)

The following three producers in Austria responded to the Commission's questionnaire: Boehler Bleche GmbH & Co. ("Boehler Bleche"), Böhler Edelstahl GmbH & Co. KG ("Böhler Edelstahl"), and voestalpine Grobblech GmbH ("voestalpine"). The main producer of CTL plate in Austria is ***.[9]

The following two producers in Belgium responded to the Commission's questionnaire: ArcelorMittal Industeel Belgium ("ArcelorMittal (BE)") and NLMK Plate Sales SA ("NLMK Plate"). *** is the largest producer of CTL plate in Belgium.[10]

The following three producers in Brazil responded to the Commission's questionnaire: Gerdau Açominas, Usinas Siderúrgicas de Minas Gerais S.A. ("Usiminas"), and Villares Metals S.A. ("Villares"). *** is the largest producer of CTL plate in Brazil. The other known producer of CTL plate in Brazil is ***, which is owned by ***.[11]

Jiangyin Xingcheng Special Steel Works, Co. Ltd. ("Jiangyin Xingchen") was the only producer in China that responded to the Commission's questionnaire in this proceeding. There are believed to be *** producers of CTL plate in China, the largest of which include ***.[12]

Three producers in France responded to the Commission's questionnaire: ArcelorMittal Industeel France ("ArcelorMittal (FR)"), Dillinger France S.A. ("Dillinger France"), and Entrepose Industries ("Entrepose"). *** is the largest producer of CTL plate in France.[13]

The following eight producers in Germany responded to the Commission's questionnaire: Buderus Edelstahl GmbH ("Buderus"), Aktien-Gesellschaft del Dillinger Huettenwerke ("Dillinger Huettenwerke"), Doerrenberg Edelstahl GmbH ("Doerrenberg"), Friedr. Lohmann GmbH ("Friedr. Lohmann"), Thyssenkrupp Schulte GmbH ("Thyssenkrupp Schulte"), Thyssenkrupp Steel Europe AG ("Thyssenkrupp Europe"), Salzgitter AG ("Salzgitter"), and Schmiedewerke Gröditz GmbH ("Schmiedewerke"). There are believed to be *** major producers of CTL plate in Germany, the largest of which include ***.[14]

The following four producers in Italy responded to the Commission's questionnaire: EVRAZ Palini E Bertoli S.r.l. ("EVRAZ Palini"), Ilva SpA ("Ilva"), NLMK Verona S.p.A. ("NLMK Verona"), and Officine Tecnosider S.r.l. ("Officine"). There are believed to be *** producers of CTL plate in Italy, the largest of which include ***.[15]

(…*continued*)
processors: AHT, Inc. ("AHT"), American Steel/American Metals Corporation ("American"), Allegheny Steel Distributors ("Allegheny"), Cargill Metals Supply Chain ("Cargill"), Feralloy Corporation ("Feralloy"), Friedman Industries ("Friedman"), Kloeckner Metals Corporation ("Kloeckner"), Metals USA, PDM Steel ("PDM"), Reliance Steel ("Reliance"), Ryerson, and Steel Warehouse Company LLC ("Steel Warehouse"). Additional firms that are believed to have the capacity to process CTL plate include Lapham-Hickey and Olympic Steel, Inc. ("Olympic"). Additional firms that are believed to have the capacity to process CTL plate include ***. Of the responding U.S. producers of CTL plate, *** produce limited volume steel CTL plate such as tool steel. Ibid.

[9] ***.

[10] ***.

[11] ***.

[12] ***. ***.

[13] ***.

[14] ***.

[15] ***. ***.

The following six producers in Japan responded to the Commission's questionnaire: Daido Steel Co., Ltd ("Daido"), Hitachi Metals, Ltd. ("Hitachi"), JFE Steel Corporation ("JFE Steel"), Kobe Steel, Ltd. ("Kobe Steel"), Nippon Steel & Sumitomo Metal Corporation ("NSSMC"), and Tokyo Steel Manufacturing Company Limited ("Tokyo Steel"). There are believed to be *** producers of CTL plate in Japan, the largest of which include ***.[16]

POSCO was the only producer in Korea that responded to the Commission's questionnaire in this proceeding. There are believed to be *** producers of CTL plate in Korea, the largest of which include ***.[17]

The following two producers in South Africa responded to the Commission's questionnaire: ArcelorMittal South Africa and EVRAZ Highveld Steel and Vanadium Ltd. ("EVRAZ Highveld"). The main producer of CTL plate in South Africa includes ***.[18]

The following three producers in Taiwan responded to the Commission's questionnaire: China Steel Corporation ("CSC"), Shang Chen Steel Co., Ltd. ("Shang Chen"), and Tung Ho Enterprise Corporation ("Tung Ho"). The largest producers of CTL plate in Taiwan include ***.[19]

Eregli Demir ve Celik Fabrikalari T.A.S. ("Erdemir") is the only producer in Turkey that responded to the Commission's questionnaire in this proceeding. *** is the main known producer of CTL plate in Turkey.[20]

The leading U.S. importer of CTL plate from Austria is *** and the leading U.S. importer of CTL plate from Belgium is ***. The leading U.S. importers of CTL plate from Brazil are ***. The leading U.S. importers of CTL plate from China are ***. The leading U.S. importer of CTL plate from France and Germany is *** and the leading U.S. importer of CTL plate from Italy is ***. The leading U.S. importers of CTL plate from Japan are ***. The leading U.S. importers of CTL plate from Korea are ***. The leading U.S. importers of CTL plate from South Africa are *** and the leading U.S. importer of CTL plate from Taiwan is ***. The leading U.S. importers of CTL plate from Turkey are ***. The leading U.S. importers of CTL plate from nonsubject countries (primarily Canada and Mexico) are ***.

The largest purchasers of CTL plate, which responded to the Commission's U.S. purchaser questionnaire, from January 2013 to September 2016 were ***.

Apparent U.S. consumption of CTL plate totaled approximately 8.3 million short tons ($5.8 billion) in 2015. Approximately two dozen firms produce CTL plate in the United States, either in mills or on processing lines that cut hot-rolled coils into discrete lengths. U.S. producers' U.S. shipments of CTL plate totaled 6.8 million short tons ($4.7 billion) in 2015, and accounted for 82.1 percent of apparent U.S. consumption by quantity and 80.8 percent by value. U.S. imports from subject sources totaled *** short tons ($***) in 2015 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from nonsubject sources totaled *** short tons ($***) in 2015 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value.

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[16] ***. ***.

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[19] ***.

[20] ***.

SUMMARY DATA AND DATA SOURCES

A summary of data collected in these investigations is presented in appendix C, table C-1. Except as noted, U.S. industry data are based on questionnaire responses of 21 firms (*i.e.*, 10 mills and 11 processors). Staff believes these firms account for a substantial majority of U.S. production of CTL plate. U.S. imports are based on statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000). Certain imports of CTL plate are already subject to existing orders; such imports have been identified based on proprietary Customs records.

Usable importer questionnaire responses were received from 93 companies, representing virtually all U.S. imports from Austria, virtually all U.S. imports from Belgium, 86.8 percent of U.S. imports from Brazil, 35.8 percent of U.S. imports from China, virtually all U.S. imports from France, virtually all U.S. imports from Germany, 89.0 percent of U.S. imports from Italy, virtually all U.S. imports from Japan, all U.S. imports from Korea (POSCO), virtually all U.S. imports from South Africa, 94.6 percent of U.S. imports from Taiwan, 62.9 percent of U.S. imports from Turkey, and 67.1 percent of U.S. imports from nonsubject sources during 2015.[21]

Thirty-five producers of CTL plate in the 12 subject countries submitted questionnaires. Based on reported data, these producers account for:

- Austria: *** production and *** exports to the United States in 2015.
- Belgium: *** production and *** exports to the United States in 2015.
- Brazil: *** production and *** exports to the United States in 2015.
- China: *** production and *** exports to the United States in 2015.
- France: *** production and *** exports to the United States in 2015.
- Germany: *** production and *** exports to the United States in 2015.
- Italy: *** production and *** exports to the United States in 2015.
- Japan: *** production and *** exports to the United States in 2015.
- Korea: *** production and *** exports to the United States in 2015.
- South Africa: *** production and *** exports to the United States in 2015.
- Taiwan: *** production and *** exports to the United States in 2015.
- Turkey: *** production and *** exports to the United States in 2015.[22]

[21] The coverage estimates presented are based on official import statistics and proprietary Customs data.

[22] The coverage of production estimates are based on the sum of reported production shares in response to Commission questionnaires. The coverage of exports estimates are based on reported exports estimates as a percentage of official import statistics or proprietary Customs data.

PREVIOUS AND RELATED INVESTIGATIONS

The Commission has conducted numerous antidumping and countervailing duty investigations regarding CTL plate. Table I-1 presents a summary of these investigations. Before this proceeding, no original investigations have been instituted since 1999. As shown in table I-1, there are six active antidumping duty orders, three countervailing duty orders, and two suspension agreements covering a total of six countries currently in place.[23]

[23] These countries are China, Korea, India, Indonesia, Russia, and Ukraine. Although the domestic interested parties filed a request with Commerce to terminate the 2003 agreement suspending the antidumping duty investigation on CTL plate from Russia, arguing that it is both no longer in the public interest and it may have been violated by Severstal, Commerce has not acted on it further. *Cut-to-Length Carbon Steel Plate from China, Russia, and Ukraine, Investigation Nos. 731-TA-753, 754, and 756 (Third Review)*, USITC Publication 4581, December 2015, p, I-6; ***.

Table I-1
CTL plate: U.S. investigations regarding CTL plate

Original investigation				Subsequent actions
Date[1]	Number	Country	Outcome	
1978	AA1921-179	Japan	Affirmative	ITA revoked (1986)
1979	AA1921-197	Taiwan	Affirmative	Affirmative first review (1999) Negative second review (2005)
1980	AA1921-203	Poland	Negative	-
1980	731-TA-18	Belgium	Affirmative[2]	Terminated (1980)
1980	731-TA-19	Germany (West)	Affirmative[2]	Petition withdrawn (1980)
1980	731-TA-20	France	Affirmative[2]	Petition withdrawn (1980)
1980	731-TA-21	Italy	Affirmative[2]	Petition withdrawn (1980)
1980	731-TA-22	Luxembourg	Affirmative[2]	Petition withdrawn (1980)
1980	731-TA-23	Netherlands	Affirmative[2]	Petition withdrawn (1980)
1981	731-TA-24	United Kingdom	Affirmative[2]	Petition withdrawn (1980)
1981	701-TA-83	Belgium	Affirmative[2]	Incorporated into 701-TA-86
1982	701-TA-84	Brazil	Affirmative[2]	Incorporated into 701-TA-87
1982	731-TA-51	Romania	Affirmative[2]	Incorporated into 731-TA-58
1982	701-TA-86	Belgium	Affirmative	Terminated (1982)
1982	701-TA-87	Brazil	Affirmative	Terminated (1985)
1982	701-TA-88	France	Negative[2]	-
1982	701-TA-89	Italy	Negative[2]	-
1982	701-TA-90	Luxembourg	Negative[2]	-
1982	701-TA-91	Netherlands	Negative[2]	-
1982	701-TA-92	United Kingdom	Affirmative[2]	Terminated (1982)
1982	701-TA-93	Germany (West)	Affirmative[2]	Terminated (1982)
1982	701-TA-155	Spain	Affirmative	ITA revoked (1985)
1982	701-TA-170	Korea	Affirmative	ITA revoked (1985)
1982	731-TA-53	Belgium	Affirmative[2]	Terminated (1982)
1982	731-TA-54	France	Negative[2]	-
1982	731-TA-55	Italy	Negative[2]	-
1982	731-TA-56	Luxembourg	Negative[2]	-
1982	731-TA-57	Netherlands	Negative[2]	-
1982	731-TA-58	Romania	Affirmative[2]	Terminated (1985)
1982	731-TA-59	United Kingdom	Affirmative[2]	Terminated (1982)
1982	731-TA-60	Germany (West)	Affirmative[2]	Terminated (1982)
1983	701-TA-204	Brazil	Affirmative	ITA revoked (1985)
1983	731-TA-123	Brazil	Affirmative	ITA revoked (1985)
1983	731-TA-146	Belgium	Affirmative[2]	Terminated (1984)
1983	731-TA-147	Germany (West)	Affirmative (on remand)[2]	Terminated (1984)
1983	731-TA-151	Korea	Affirmative	ITA revoked (1986)
1984	701-TA-225	Sweden	Negative	-
1984	701-TA-226	Venezuela	Affirmative[2]	Terminated (1985)

Table continued on next page.

Table I-1—Continued
CTL plate: U.S. investigations regarding CTL plate

Original investigation				Subsequent actions
Date[1]	Number	Country	Outcome	
1984	731-TA-169	Finland	Affirmative[2]	Petition withdrawn (1985)
1984	731-TA-170	South Africa	Affirmative[2]	Petition withdrawn (1984)
1984	731-TA-171	Spain	Affirmative[2]	Terminated (1985)
1984	731-TA-213	Czechoslovakia	Affirmative[2]	Petition withdrawn (1985)
1984	731-TA-214	Germany (East)	Affirmative[2]	Terminated (1985)
1984	731-TA-215	Hungary	Affirmative[2]	Petition withdrawn (1985)
1984	731-TA-216	Poland	Affirmative[2]	Terminated (1985)
1984	731-TA-217	Venezuela	Affirmative[2]	Petition withdrawn (1985)
1992	701-TA-319	Belgium	Affirmative	Affirmative first review (2000) Negative second review (2007)
1992	701-TA-320	Brazil	Affirmative	Affirmative first review (2000) Negative second review (2007)
1992	701-TA-321	France	Negative	-
1992	701-TA-322	Germany	Affirmative	Affirmative first review (2000) ITA revoked (2004)
1992	701-TA-323	Italy	Negative	-
1992	701-TA-324	Korea	Negative	-
1992	701-TA-325	Mexico	Affirmative	Affirmative first review (2000) Negative second review (2007)
1992	701-TA-326	Spain	Affirmative	Affirmative first review (2000) Negative second review (2007)
1992	701-TA-327	Sweden	Affirmative	Affirmative first review (2000) Negative second review (2007)
1992	701-TA-328	United Kingdom	Affirmative	Affirmative first review (2000) ITA revoked (2006)
1992	731-TA-573	Belgium	Affirmative	Affirmative first review (2000) Negative second review (2007)
1992	731-TA-574	Brazil	Affirmative	Affirmative first review (2000) Negative second review (2007)
1992	731-TA-575	Canada	Affirmative	Negative first review (2000)
1992	731-TA-576	Finland	Affirmative	Affirmative first review (2000) Negative second review (2007)
1992	731-TA-577	France	Negative	-
1992	731-TA-578	Germany	Affirmative	Affirmative first review (2000) Negative second review (2007)
1992	731-TA-579	Italy	Negative	-
1992	731-TA-580	Japan	Negative[2]	-
1992	731-TA-581	Korea	Negative	-
1992	731-TA-582	Mexico	Affirmative	Affirmative first review (2000) Negative second review (2007)
1992	731-TA-583	Poland	Affirmative	Affirmative first review (2000) Negative second review (2007)
1992	731-TA-584	Romania	Affirmative	Affirmative first review (2000) Negative second review (2007)

Table continued on next page.

Table I-1—Continued
CTL plate: U.S. investigations regarding CTL plate

Original investigation				Subsequent actions
Date[1]	Number	Country	Outcome	
1992	731-TA-585	Spain	Affirmative	Affirmative first review (2000) Negative second review (2007)
1992	731-TA-586	Sweden	Affirmative	Affirmative first review (2000) Negative second review (2007)
1992	731-TA-587	United Kingdom	Affirmative	Affirmative first review (2000) Negative second review (2007)
1996	731-TA-753	China	Affirmative	Affirmative first review (2003) Affirmative second review (2009) Affirmative third review (2015)
1996	731-TA-754	Russia	Affirmative[3]	Affirmative first review (2003) Affirmative second review (2009) Affirmative third review (2015)
1996	731-TA-755	South Africa	Affirmative	Negative first review (2003)
1996	731-TA-756	Ukraine	Affirmative[3]	Affirmative first review (2003) Affirmative second review (2009) Affirmative third review (2015)
1999	731-TA-815	Czech Republic	Negative[2]	-
1999	731-TA-816	France	Affirmative	Negative first review (2005)
1999	731-TA-817	India	Affirmative	Affirmative first review (2005) Affirmative second review (2011)
1999	731-TA-818	Indonesia	Affirmative	Affirmative first review (2005) Affirmative second review (2011)
1999	731-TA-819	Italy	Affirmative	Affirmative first review (2005) Negative second review (2011)
1999	731-TA-820	Japan	Affirmative	Affirmative first review (2005) Negative second review (2011)
1999	731-TA-821	Korea	Affirmative	Affirmative first review (2005) Affirmative second review (2011)
1999	731-TA-822	Macedonia	Negative[2]	-
1999	701-TA-388	India	Affirmative	Affirmative first review (2005) Affirmative second review (2011)
1999	701-TA-389	Indonesia	Affirmative	Affirmative first review (2005) Affirmative second review (2011)
1999	701-TA-391	Korea	Affirmative	Affirmative first review (2005) Affirmative second review (2011)

[1] Date refers to year in which the investigation was instituted at the Commission.
[2] Preliminary determinations.
[3] Suspension agreements in place.

Note.--Shading signifies an order that is still in place.

Source: *Cut-To-Length Carbon Steel Plate from China, Russia, and Ukraine, Investigation Nos. 731-TA-753, 754, and 756 (Third Review),* USITC Publication 4581, December 2015, pp. I-6 – I-10. Active order status updated using USITC investigations database at http://usitc.gov/sites/default/files/trade_remedy/documents/orders.xls, retrieved October 3, 2016.

Safeguard investigations

In 1984, the Commission determined that carbon and alloy steel (including CTL plate) were being imported into the United States in such increased quantities as to be a substantial cause of serious injury to the domestic industry producing such articles, and recommended quantitative restrictions of imports for a period of five years. President Ronald Reagan determined that import relief under section 201 of the Trade Act of 1974 was not in the national interest. At the President's direction, quantitative limitations under voluntary restraint agreements ("VRAs") for a five-year period ending September 30, 1989, were negotiated. In July 1989, the VRAs were extended for two and one half years until March 31, 1992.

In 2001, the Commission determined that certain carbon and alloy steel, including CTL plate, was being imported into the United States in such increased quantities as to be a substantial cause of serious injury to the domestic industry producing such articles, and recommended additional duties on imports for a period of four years.[24] On March 5, 2002, President George W. Bush announced the implementation of steel safeguard measures. Import relief relating to CTL plate consisted of an additional tariff for a period of three years and one day (30 percent ad valorem on imports in the first year, 24 percent in the second year, and 18 percent in the third year).[25] Following receipt of the Commission's mid-term monitoring report in September 2003, and after seeking information from the U.S. Secretary of Commerce and U.S. Secretary of Labor, President Bush determined that the effectiveness of the action taken had been impaired by changed circumstances. Therefore, he terminated the U.S. measure with respect to increased tariffs on December 4, 2003.[26]

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[24] *Steel; Import Investigations*, 66 FR 67304, December 28, 2001.

[25] *Presidential Proclamation 7529 of March 5, 2002, To Facilitate Positive Adjustment to Competition From Imports of Certain Steel Products*, 67 FR 10553, March 7, 2002. The President also instructed the Secretaries of Commerce and the Treasury to establish a system of import licensing to facilitate steel import monitoring.

[26] *Presidential Proclamation 7741 of December 4, 2003, To Provide for the Termination of Action Taken With Regard to Imports of Certain Steel Products*, 68 FR 68483, December 8, 2003. Import licensing, however, remained in place through March 21, 2005, and continues in modified form at this time.

COMMERCE'S CRITICAL CIRCUMSTANCES DETERMINATIONS

On September 7, 2016, Commerce published notice in the *Federal Register* of its preliminary determinations that critical circumstances exist for imports of CTL plate from certain producers and exporters in Austria, Belgium, Brazil, Taiwan, and Turkey.[27] On November 14, 2016, Commerce published a notice in the *Federal Register* of its preliminary determination that critical circumstances exist for imports of CTL plate from certain producers and exporters in Italy.[28] On December 5, 2016, Commerce published a notice in the *Federal Register* of its final determinations that critical circumstances continue to exist for imports of CTL plate from all producers and exporters in Brazil and Turkey.[29] Commerce's final determinations concerning critical circumstances for imports of CTL plate from certain producers and exporters from Austria, Belgium, Italy, and Taiwan are scheduled to be issued on March 20, 2017. Commerce's affirmative and negative critical circumstances findings are summarized in table I-2.

[27] Commerce preliminarily found that critical circumstances do not exist for imports of CTL plate from Korea. *Certain Carbon and Alloy Steel Cut-to-Length Plate From Austria, Belgium, Brazil, the Republic of Korea, Taiwan, and Turkey; Antidumping and Countervailing Duty Investigations: Preliminary Determinations of Critical Circumstances*, 81 FR 61666, September 7, 2016.

[28] *Certain Carbon and Alloy Steel Cut-To-Length Plate From Italy: Preliminary Determination of Sales at Less Than Fair Value, Affirmative Determination of Critical Circumstances, and Postponement of Final Determination*, 81 FR 79423, November 14, 2016.

[29] *Certain Carbon and Alloy Steel Cut-to-Length Plate From Brazil, South Africa, and the Republic of Turkey: Affirmative Final Determination of Sales at Less Than Fair Value and Affirmative Final Determinations of Critical Circumstances for Brazil and the Republic of Turkey*, 81 FR 87544, December 5, 2016.

Table I-2
CTL plate: Commerce's preliminary critical circumstances determinations for Austria, Belgium, Italy, Korea, and Taiwan, and final critical circumstances determinations for Brazil and Turkey

Country	Commerce case number	Companies receiving affirmative critical circumstances determinations	Companies receiving negative critical circumstances determinations
Austria	A-433-812	voestalpine	All other producers/exporters
Belgium	A-423-812	Industeel Belgium SA ("Industeel Belgium"); NLMK Clabecq	All other producers/exporters
Brazil	A-351-847	All producers/exporters	No companies
Italy	A-475-834	Marcegaglia SpA ("Marcegaglia"); NLMK Verona SpA ("NLMK Verona"); Officine Tecnosider s.r.l. ("Officine")	All other producers/exporters
Korea	A-580-887	No companies	POSCO/POSCO Daewoo Corporation; all other producers/exporters[1]
	C-580-888	No companies	POSCO/POSCO Daewoo Corporation; all other producers/exporters[1]
Taiwan	A-583-858	China Steel Corporation ("CSC"); all other producers/exporters	Shang Chen Steel Co., Ltd. ("Shang Chen")
Turkey	A-489-828	All producers/exporters	No companies

[1] The products exported by all other producers/exporters in Korea are substantially high alloy products but may also include products that were included in the scope of the previous 1999 orders on CTL plate from Korea that are excluded from the scope of these investigations.

Source: *Certain Carbon and Alloy Steel Cut-to-Length Plate From Austria, Belgium, Brazil, the Republic of Korea, Taiwan, and Turkey; Antidumping and Countervailing Duty Investigations: Preliminary Determinations of Critical Circumstances*, 81 FR 61666, September 7, 2016; *Certain Carbon and Alloy Steel Cut-To-Length Plate From Italy: Preliminary Determination of Sales at Less Than Fair Value, Affirmative Determination of Critical Circumstances, and Postponement of Final Determination*, 81 FR 79423, November 14, 2016; *Certain Carbon and Alloy Steel Cut-to-Length Plate From Brazil, South Africa, and the Republic of Turkey: Affirmative Final Determinations of Sales at Less Than Fair Value and Affirmative Final Determination of Critical Circumstances for Brazil and the Republic of Turkey*, 81 FR 87544, December 5, 2016.

NATURE AND EXTENT OF SUBSIDIES AND SALES AT LTFV

Subsidies

On September 13, 2016, Commerce published a notice in the *Federal Register* of its preliminary determination of countervailing subsidies for producers and exporters of CTL plate

from China.[30] Table I-3 presents Commerce's preliminary findings of subsidization of CTL plate in China.

Table I-3
CTL plate: Commerce's preliminary subsidy determinations with respect to imports from China

Entity	Preliminary countervailable subsidy rate (percent)
Hunan Valin Xiangtan Iron & Steel	210.50
Jiangyin Xingcheng Special Steel Works Co. Ltd.	210.50
Viewer Development Co., Ltd.	210.50
All Others	210.50

Source: *Certain Carbon and Alloy Steel Cut-to-Length Plate From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination*, 81 FR 62871, September 13, 2016.

Commerce preliminarily determined subsidy rates to apply to Hunan Valin Xiangtan Iron & Steel, Jiangyin Xingcheng Special Steel Works Co. Ltd., and Viewer Development Co. Ltd. for the following income tax reduction programs on which Commerce initiated an investigation:

- Preferential Income Tax Program for High and New Technology Enterprises ("HNTEs")
- Preferential Income Tax Program for HNTEs in Designated Zones
- Preferential Deduction of R&D Expenses for HNTEs
- Preferential Income Tax Program for Foreign Invested Enterprises ("FIEs") – HNTEs
- Preferential Tax Programs for Foreign Invested Enterprises – Exported Oriented FIEs
- Income Tax Credits for Domestically-Owned Enterprises Purchasing Domestically Produced Equipment

Commerce preliminarily determined subsidy rates for the following programs not mentioned above based on program names, descriptions, and benefit treatments that are the same or similar to programs from other Chinese CVD proceedings:

- Policy Loans for the CTL Plate Industry
- Export Loans
- Treasury Bond Loans
- Preferential Loans for State-Owned Enterprises ("SOEs")
- Preferential Loans for Key Projects and Technologies
- Preferential Lending to CTL Plate Producers and Exporters Classified As "Honorable Enterprises"

[30] *Certain Carbon and Alloy Steel Cut-to-Length Plate From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination*, 81 FR 62871, September 13, 2016.

- Loans and Interest Subsidies Provided Pursuant to the Northeast Revitalization Program
- Debt-to-Equity Swaps
- Exemptions for SOEs from Distributing Dividends
- Loan and/or Interest Forgiveness for SOEs
- Stamp Tax Exemption on Share Transfer Under Non-Tradeable Share Reform
- VAT and Tariff Exemptions for Purchasers of Fixed Assets Under the Foreign Trade Development Fund
- Import Tariff and VAT Exemptions for Foreign-Invested Enterprises ("FIEs") and Certain Domestic Enterprises Using Imported Equipment in Encouraged Industries
- Deed Tax Exemption for SOEs Undergoing Mergers or Restructuring
- Provision of Land Use Rights for LTAR
- Provision of Land to SOEs for LTAR
- Provision of Hot-Rolled Steel For LTAR
- Provision of Iron Ore for LTAR
- Provision of Steam Coal for LTAR
- Provision of Coking Coal for LTAR
- Provision of Electricity for LTAR
- State Key Technology Project Fund
- Foreign Trade Development Fund Grants
- Export Assistance Grants
- Programs to Rebate Antidumping Legal Fees
- Subsidies for Development of Famous Brands and China World Top Brands
- Sub-Central Government Programs to Promote Famous Export Brands and China World Top Brands[31]

On September 14, 2016, Commerce published a notice in the *Federal Register* of its preliminary negative determination of countervailing subsidies for producers and exports of CTL plate from Korea. Commerce preliminarily determined the countervailing subsidy rate for POSCO to be 0.62 percent (*de minimis*).[32] Commerce preliminarily found the following programs to be countervailable:

1. Energy Savings Program Subsidies: Demand Response Market Program
2. Restriction of Special Taxation Act (RSTA) Article (10)(1)(3): Tax Reduction for Research and Human Resources Development

[31] *Decision Memorandum for the Preliminary Affirmative Determination: Countervailing Duty Investigation of Certain Carbon and Alloy Steel Cut-to-Length Plate from the People's Republic of China*, U.S. Department of Commerce, International Trade Administration, September 6, 2016.

[32] *Certain Carbon and Alloy Steel Cut-to-Length Plate From the Republic of Korea: Preliminary Negative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination*, 81 FR 63168, September 14, 2016.

3. Restriction of Special Taxation Act ("RSTA") Article 11: Tax Credit for Investment in Facilities for Research and Manpower
4. RSTA Article 25(3): Tax Credit for Investment in Environmental and Safety Facilities
5. RSTA Article 26: Government of Korea Facilities Investment Support
6. RSTA Article 104(14): Third Party Logistics Operation
7. RSTA Article 9: Reserve for Research and Human Resources Development
8. Restriction of Special Local Taxation Act (RSLTA) Article 78(4): Reduction and Exemption for Industrial Complexes
9. R&D Grants under the Industrial Technology Innovation Promotion Act ("ITIPA")

Furthermore, POSCO reported receiving multiple P&D grants outside of the ITIPA program in addition to receiving income tax benefits under the RSTA Article 10-2. POSCO also reported its 1989 revaluation of certain assets pursuant to Article 56(2) of the Tax Reduction and Exemption Control Act. Commerce intends to obtain additional information regarding these grants and tax programs and will address these grants in a post-preliminary analysis.[33]

Commerce found the following program to be not countervailable:

1. Granting of Rights to Import, Store, and/or Re-Export Liquefied Natural Gas ("LNG")

Commerce found the following programs not to have conferred a benefit:

1. Provision of Electricity for Less Than Adequate Remuneration ("LTAR")
2. Energy Savings Program Subsidies – Demand Adjustment Program of Emergency Load Reduction
3. Purchase of Electricity for More than Adequate Remuneration
4. Power Generation Price Difference Payments
5. Korean Export-Import ("KEXIM") Bank Import Financing
6. KEXIM Overseas Investment Credit Program
7. Korea Development Bank ("KDB") and Other Policy Banks' Short-Term Discounted Loans for Export Receivables
8. Long-Term Loans from the Korean Resources Corporation ("KORES") and the Korea National Oil Corporation ("KNOC")
9. VAT Exemption for Purchases of Anthracite Coal
10. RSTA Article (25)(2): Tax Deduction for Investments in Energy Economizing Facilities
11. PDC's Debt Workout
12. Modal Shift Program
13. Various Government Grants Contained in Financial Statement
14. RSTA Article 7-2: Tax Credit to Improve Corporation Payment System Including Negotiable Instruments

[33] *Decision Memorandum for the Preliminary Negative Determination: Countervailing Duty Investigation of Certain Carbon and Alloy Steel Cut-to-Length Plate from the Republic of Korea*, U.S. Department of Commerce, International Trade Administration, September 6, 2016.

15. RSTA Article 8-3: Tax Credit when Making Contribution to Funds for Collaborative Cooperation between Large Enterprises and SMEs
16. RSTA Article 24: Investment in Productivity Improving Facilities
17. RSTA Article 25: Investment in Certain Enumerated Safety Facilities
18. RSTA Article 30: Investment in Certain Fixed Assets for Use for Business Purposes
19. RSTA Article 94: Acquisition of Facilities to Improve Employee Welfare
20. RSTA Article 104(15): Development of Overseas Resources
21. RSTA Article 22: Exemption from Corporation Tax on Dividend Income from Investment in Overseas Resource Development
22. RSTA Article 104(8)(1): Tax Credits for Electronic Returns
23. RSTA Article 121(2): Corporate Tax Reduction or Exemption for Foreign Investment
24. Pre-1992 Directed Credit Loans
25. R&D and Other Subsidies in AUL Period
26. Grants from the Korea Workers' Compensation & Welfare Service
27. Port Usage Grants for Pohang Youngil Port

Commerce preliminarily determined the following program to be not used:

1. Korea Export Insurance Corporation ("K-SURE") Short-Term Export Credit Insurance

Commerce also preliminary determined that respondents did not apply for or receive benefits during the period of investigation under the following programs:

Provision of Inputs for Less Than Adequate Remuneration

1. Power Business Law Subsidies
2. Provision LNG for LTAR

KEXIM Countervailable Subsidy Programs

3. Short-Term Export Credits
4. Export Factoring
5. Export Loan Guarantees
6. Trade Bill Rediscounting Program

KDB and Industrial Base Fund Loans

7. Loans under the Industrial Base Fund

K-SURE – Export Insurance and Export Credit Guarantees

8. Export Credit Guarantees

Energy and Resource Subsidies

9. Special Accounts for Energy and Resources ("SAER") Loans
10. Clean Coal Subsidies

Green Subsidies

11. Government of Korea Subsidies for “Grene Technology R & D and its Commercialization
12. Support for SME “Green Partnerships”

Income Tax Programs

13. Research, Supply, or Workforce Development Investment Tax Deduction for “New Growth Engines” under RSTA Article 10(1)(1)
14. Research, Supply, or Workforce Development Expense Tax Deductions for “Core Technologies” under RSTA Article 10(1)(2)
15. Adjustment for any Foreign Source Income under Article 57 of the Corporate Tax Act

Subsidies to Companies Located in Certain Economic Zones

16. Tax Reductions and Exemptions in Free Economic Zones
17. Exemptions and Reduction of Lease Fees in Free Economic Zones
18. Grants and Financial Support in Free Economic Zones

Grants

19. Sharing of Working Opportunities/Employment Creating Incentives
20. Dongbu’s Debt Restructuring

Other Subsidies

21. PDC – Various Transactions with KDB During 2015
22. Hyosung – Korea Finance Corporation/KDB Facility Loans
23. Hyosung – KDB Usance Loans
24. Hyosung – Industrial Bank of Korea Short-Term Discounted Loans for Export Receivables
25. PNR – Long-Term Facility and General Loans from KDB

Sales at LTFV

On September 22, 2016, Commerce published a notice in the *Federal Register* of its preliminary determinations of sales at LTFV with respect to imports from Brazil, South Africa, and Turkey.[34] On December 5, 2016, Commerce published a notice in the *Federal Register* of its final determinations of sales at LTFV with respect to imports from Brazil, South Africa, and Turkey.[35] Table I-4 presents Commerce's preliminary and final dumping margins with respect to imports of CTL plate from Brazil, South Africa, and Turkey.

Table I-4
CTL plate: Commerce's preliminary and final weighted-average LTFV margins with respect to imports from Brazil, South Africa, and Turkey

Exporter/producer	Preliminary dumping margin (percent)	Final dumping margin (percent)
Brazil		
Companhia Siderúrgica Nacional	74.52	74.52
Usinas Siderúrgicas de Minas Gerais SA	74.52	74.52
All others	74.52	74.52
South Africa		
EVRAZ Highveld Steel and Vanadium Corp.	94.14	94.14
All others	87.72	87.72
Turkey		
Eregli Demir ve Celik Fabrikalari T.A.S.	50.00	50.00
All others	42.02	42.02

Source: *Certain Carbon and Alloy Steel Cut-to-Length Plate From Brazil, South Africa, and the Republic of Turkey: Affirmative Preliminary Determinations of Sales at Less Than Fair Value*, 81 FR 65337, September 22, 2016; *Certain Carbon and Alloy Steel Cut-to-Length Plate From Brazil, South Africa, and the Republic of Turkey: Affirmative Final Determinations of Sales at Less Than Fair Value and Affirmative Final Determinations of Critical Circumstances for Brazil and the Republic of Turkey*, 81 FR 87544, December 5, 2016.

[34] *Certain Carbon and Alloy Steel Cut-to-Length Plate From Brazil, South Africa, and the Republic of Turkey: Affirmative Preliminary Determinations of Sales at Less Than Fair Value*, 81 FR 65337, September 22, 2016.

[35] *Certain Carbon and Alloy Steel Cut-to-Length Plate From Brazil, South Africa, and the Republic of Turkey: Affirmative Final Determinations of Sales at Less Than Fair Value and Affirmative Final Determinations of Critical Circumstances for Brazil and the Republic of Turkey*, 81 FR 87544, December 5, 2016.

On November 14, 2016, Commerce published a notice in the *Federal Register* of its preliminary determination of sales at LTFV with respect to imports from Austria,[36] Belgium,[37] China,[38] France,[39] Germany,[40] Italy,[41] Japan,[42] Korea,[43] and Taiwan.[44] Commerce's final determination of sales at LTFV with respect to imports from China is scheduled to be issued on January 30, 2017. Commerce's final determinations of sales at LTFV with respect to imports from Austria, Belgium, France, Germany, Italy, Japan, Korea, and Taiwan are scheduled to be issued on March 20, 2016. Table I-5 presents Commerce's dumping margins with respect to imports of CTL plate from these countries.

[36] *Certain Carbon and Alloy Steel Cut-To-Length Plate From Austria: Preliminary Determination of Sales at Less Than Fair Value and Postponement of the Final Determination,* 81 FR 79416, November 14, 2016.

[37] *Certain Carbon and Alloy Steel Cut-To-Length Plate From Belgium: Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination,* 81 FR 79431, November 14, 2016.

[38] *Certain Carbon and Alloy Steel Cut-To-Length Plate from the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value,* 81 FR 79450, November 14, 2016.

[39] *Certain Carbon and Alloy Steel Cut-To-Length Plate From France: Correction to the Amended Preliminary Determination of Sales at Less Than Fair Value,* 81 FR 90780, December 15, 2016.

[40] *Certain Carbon and Alloy Steel Cut-To-Length Plate From the Federal Republic of Germany: Amended Preliminary Determination of Sales at Less Than Fair Value,* 81 FR 85930, November 29, 2016.

[41] *Certain Carbon and Alloy Steel Cut-To-Length Plate From Italy: Preliminary Determination of Sales at Less Than Fair Value, Affirmative Determination of Critical Circumstances, and Postponement of Final Determination,* 81 FR 79423, November 14, 2016.

[42] *Certain Carbon and Alloy Steel Cut-To-Length Plate From Japan: Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination,* 81 FR 79427, November 14, 2016.

[43] *Certain Carbon and Alloy Steel Cut-To-Length Plate From the Republic of Korea: Affirmative Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination,* 81 FR 79441, November 14, 2016.

[44] *Certain Carbon and Alloy Steel Cut-To-Length Plate From Taiwan: Preliminary Determination of Sales at Less Than Fair Value,* 81 FR 79420, November 14, 2016.

Table I-5
CTL plate: Commerce's preliminary and weighted-average LTFV margins with respect to imports from Austria, Belgium, China, France, Germany, Italy, Japan, Korea, and Taiwan

Exporter/producer	Preliminary dumping margin (percent)	Final dumping margin (percent)
Austria		
Bohler Edelstahl GmbH & Co KG; Bohler Bleche GmbH & Co KG; Bohler International GmbH; voestalpine Grobblech GmbH; voestalpine Steel Service Center GmbH	41.97	Pending
All Others	41.97	Pending
Belgium		
Industeel Belgium S.A.	2.41	Pending
NLMK Clabecq S.A.; NLMK Plate Sales S.A.; NLMK Sales Europe S.A., NLMK Manage Steel Center S.A., and or NLMK La Louviere S.A.	8.98	Pending
All Others	8.50	Pending
China		
PRC-Wide Entity	68.27	Pending
France		
Dillinger France S.A.	6.43	Pending
Industeel France S.A.	4.26	Pending
All Others	6.34	Pending
Germany		
AG der Dillinger Hüttenwerke	6.56	Pending
Ilsenburger Grobblech GmbH; Salzgitter Mannesmann Grobblech GmbH; Salzgitter Flachstahl GmbH; and Salzgitter Mannesmann International GmbH	5.00	Pending
All Others	5.17	Pending
Italy		
NLMK Verona SpA	12.53	Pending
Officine Tecnosider s.r.l.	6.10	Pending
Marcegaglia SpA	130.63	Pending
All Others	8.34	Pending
Japan		
Tokyo Steel Manufacturing Co., Ltd.	14.96	Pending
JFE Steel Corporation	48.64	Pending
Shimabun Corporation	48.64	Pending
All Others	14.96	Pending

Table continued on next page.

Table I-5—Continued
CTL plate: Commerce's preliminary weighted-average LTFV margins with respect to imports from Austria, Belgium, China, France, Germany, Italy, Japan, Korea, and Taiwan

Exporter/producer	Preliminary dumping margin (percent)	Final dumping margin (percent)
Korea		
POSCO and POSCO Daewoo Corporation	6.82	Pending
All Others	6.82	Pending
Taiwan		
China Steel Corporation	28.00	Pending
Shang Chen Steel Co., Ltd.	3.51	Pending
All Others	3.51	Pending

Source: *Certain Carbon and Alloy Steel Cut-To-Length Plate From Austria: Preliminary Determination of Sales at Less Than Fair Value and Postponement of the Final Determination,* 81 FR 79416, November 14, 2016; *Certain Carbon and Alloy Steel Cut-To-Length Plate From Taiwan: Preliminary Determination of Sales at Less Than Fair Value,* 81 FR 79420, November 14, 2016; *Certain Carbon and Alloy Steel Cut-To-Length Plate From Italy: Preliminary Determination of Sales at Less Than Fair Value, Affirmative Determination of Critical Circumstances, and Postponement of Final Determination,* 81 FR 79423, November 14, 2016; *Certain Carbon and Alloy Steel Cut-To-Length Plate From Japan: Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination,* 81 FR 79427, November 14, 2016; *Certain Carbon and Alloy Steel Cut-To-Length Plate From Belgium: Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination,* 81 FR 79431, November 14, 2016; *Certain Carbon and Alloy Steel Cut-To-Length Plate From the Republic of Korea: Affirmative Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination,* 81 FR 79441, November 14, 2016; *Certain Carbon and Alloy Steel Cut-To-Length Plate from the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value,* 81 FR 79450, November 14, 2016; *Certain Carbon and Alloy Steel Cut-To-Length Plate From the Federal Republic of Germany: Amended Preliminary Determination of Sales at Less Than Fair Value,* 81 FR 85930, November 29, 2016; *Certain Carbon and Alloy Steel Cut-To-Length Plate From France: Correction to the Amended Preliminary Determination of Sales at Less Than Fair Value*, 81 FR 90780, December 15, 2016.

THE SUBJECT MERCHANDISE

Commerce's scope

Commerce has defined the scope of this proceeding as follows:

Certain carbon and alloy steel hot-rolled or forged flat plate products not in coils, whether or not painted, varnished, or coated with plastics or other non-metallic substances (cut-to-length plate). Subject merchandise includes plate that is produced by being cut-to-length from coils or from other discrete length plate and plate that is rolled or forged into a discrete length. The products covered include (1) Universal mill plates (i.e., flat-rolled products rolled on four faces or in a closed box pass, of a width exceeding 150 mm but not exceeding 1250 mm, and of a thickness of not less than 4 mm, which are not in coils and without patterns in relief), and (2) hot-rolled or forged flat steel products of a thickness of 4.75 mm or more and of a width which exceeds 150 mm and measures at least twice the thickness, and which are not in coils, whether or

not with patterns in relief. The covered products described above may be rectangular, square, circular or other shapes and include products of either rectangular or non-rectangular cross-section where such non-rectangular cross-section is achieved subsequent to the rolling process, i.e., products which have been ‘‘worked after rolling’’, (e.g., products which have been beveled or rounded at the edges).
For purposes of the width and thickness requirements referenced above, the following rules apply:

(1) except where otherwise stated where the nominal and actual thickness or width measurements vary, a product from a given subject country is within the scope if application of either the nominal or actual measurement would place it within the scope based on the definitions set forth above unless the product is already covered by an order existing on that specific country (e.g., orders on hot-rolled flat-rolled steel); and

(2) where the width and thickness vary for a specific product (e.g., the thickness of certain products with non-rectangular cross-section, the width of certain products with non-rectangular shape, etc.), the measurement at its greatest width or thickness applies.

Steel products included in the scope of these investigations are products in which: (1) iron predominates, by weight, over each of the other contained elements; and (2) the carbon content is 2 percent or less by weight.

Subject merchandise includes cut-to-length plate that has been further processed in the subject country or a third country, including but not limited to pickling, oiling, levelling, annealing, tempering, temper rolling, skin passing, painting, varnishing, trimming, cutting, punching, beveling, and/or slitting, or any other processing that would not otherwise remove the merchandise from the scope of the investigations if performed in the country of manufacture of the cut-to-length plate.

All products that meet the written physical description, are within the scope of these investigations unless specifically excluded or covered by the scope of an existing order. The following products are outside of, and/or specifically excluded from, the scope of these investigations:

(1) products clad, plated, or coated with metal, whether or not painted, varnished or coated with plastic or other non-metallic substances;

(2) military grade armor plate certified to one of the following specifications or to a specification that references and incorporates one of the following specifications:

- MIL-A-12560,

- MIL-DTL-12560H,
- MIL-DTL-12560J,
- MIL- DTL-12560K,
- MIL-DTL-32332,
- MIL-A-46100D,
- MIL-DTL-46100-E,
- MIL-46177C,
- MIL-S-16216K Grade HY80,
- MIL-S-16216K Grade HY100,
- MIL-S-246245A HSLA-80,
- MIL-S-24645A HSLA-100,
- T9074-BD-GIB-010/0300 Grade HY80,
- T9074-BD-GIB-010/0300 Grade HY100,
- T9074-BD-GIB-010/0300 Grade HSLA80,
- T9074-BD-GIB-010/0300 Grade HSLA100, and
- T9074-BD-GIB-010/0300 Mod. Grade HSLA115,

Except that any cut-to-length plate certified to one of the above specifications, or to a military grade armor specification that references and incorporate one of the above specifications, will not be excluded from the scope if it is also dual- or multiple-certified to any other non-armor specification that otherwise would fall within the scope of this order;

(3) stainless steel plate, containing 10.5 percent or more of chromium by weight;

(4) CTL plate meeting the requirements of ASTM A-829, Grade E 4340 that are over 305 mm in actual thickness.

(5) Alloy forged and rolled CTL plate greater than or equal to 152.4 mm in actual thickness meeting each of the following requirements:

(a) Electric Furnace melted, ladle refined & vacuum degassed and having a chemical composition (expressed in weight percentages):

- Carbon 0.23-0.28,
- Silicon 0.05-0.20,
- Manganese 1.20-1.60,
- Nickel not greater than 1.0,
- Sulfur not greater than 0.007,
- Phosphorus not greater than 0.020,
- Chromium 1.0-2.5,
- Molybdenum 0.35-0.8,
- Boron 0.002-0.004,

- Oxygen not greater than 20 ppm,
- Hydrogen not greater than 2 ppm,
- Nitrogen not greater than 60 ppm;

(b) With a Brinell hardness measured in all parts of the product including mid thickness falling within one of the following ranges:

(i) 270-300 HBW,
(ii) 290-320 HBW, or
(iii) 320-350 HBW;

(c) Having cleanliness in accordance with ASTM E45 method A (Thin and Heavy): A not exceeding 1.5, B not exceeding 1.0, C not exceeding 0.5, D not exceeding 1.5; and

(d) Conforming to ASTM A578-S9 ultrasonic testing requirements with acceptance criteria 2 mm flat bottom hole;

(6) Alloy forged and rolled steel CTL plate over 407 mm in actual thickness and meeting the following requirements:

(a) Made from Electric Arc Furnace melted, Ladle refined & vacuum degassed, alloy steel with the following chemical composition (expressed in weight percentages):

- Carbon 0.23-0.28,
- Silicon 0.05-0.15,
- Manganese 1.20-1.50,
- Nickel not greater than 0.4,
- Sulfur not greater than 0.010,
- Phosphorus not greater than 0.020,
- Chromium 1.2-1.5,
- Molybdenum 0.35-0.55,
- Boron 0.002-0.004,
- Oxygen not greater than 20 ppm,
- Hydrogen not greater than 2 ppm, and
- Nitrogen not greater than 60 ppm;

(b) Having cleanliness in accordance with ASTM E45 method A (Thin and Heavy): A not exceeding 1.5, B not exceeding 1.5, C not exceeding 1.0, D not exceeding 1.5;

(c) Having the following mechanical properties:

(i) With a Brinell hardness not more than 237 HBW measured in all parts of the product including mid thickness; and having a Yield Strength of 75ksi min and UTS 95ksi or more, Elongation of 18% or more and Reduction of area 35% or more; having charpy V at -75 degrees F in the longitudinal direction equal or greater than 15 ft. lbs (single value) and equal or greater than 20 ft. lbs (average of 3 specimens) and conforming to the requirements of NACE MR01-75; or

(ii) With a Brinell hardness not less than 240 HBW measured in all parts of the product including mid thickness; and having a Yield Strength of 90 ksi min and UTS 110 ksi or more, Elongation of 15% or more and Reduction of area 30% or more; having charpy V at -40 degrees F in the longitudinal direction equal or greater than 21 ft. lbs (single value) and equal or greater than 31 ft. lbs (average of 3 specimens);

(d) Conforming to ASTM A578-S9 ultrasonic testing requirements with acceptance criteria 3.2 mm flat bottom hole; and

(e) Conforming to magnetic particle inspection in accordance with AMS 2301;

(7) Alloy forged and rolled steel CTL plate over 407 mm in actual thickness and meeting the following requirements:

(a) Made from Electric Arc Furnace melted, ladle refined & vacuum degassed, alloy steel with the following chemical composition (expressed in weight percentages):

- Carbon 0.25-0.30,
- Silicon not greater than 0.25,
- Manganese not greater than 0.50,
- Nickel 3.0-3.5,
- Sulfur not greater than 0.010,
- Phosphorus not greater than 0.020,
- Chromium 1.0-1.5,
- Molybdenum 0.6-0.9,
- Vanadium 0.08 to 0.12
- Boron 0.002-0.004,
- Oxygen not greater than 20 ppm,
- Hydrogen not greater than 2 ppm, and
- Nitrogen not greater than 60 ppm.

(b) Having cleanliness in accordance with ASTM E45 method A (Thin and Heavy): A not exceeding 1.0(t) and 0.5(h), B not exceeding 1.5(t) and 1.0(h), C not exceeding 1.0(t) and 0.5(h), and D not exceeding 1.5(t) and 1.0(h);

(c) Having the following mechanical properties: A Brinell hardness not less than 350 HBW measured in all parts of the product including mid thickness; and having a Yield Strength of 145ksi or more and UTS 160ksi or more, Elongation of 15% or more and Reduction of area 35% or more; having charpy V at -40 degrees F in the transverse direction equal or greater than 20 ft. lbs (single value) and equal or greater than 25 ft. lbs (average of 3 specimens);

(d) Conforming to ASTM A578-S9 ultrasonic testing requirements with acceptance criteria 3.2 mm flat bottom hole; and

(e) Conforming to magnetic particle inspection in accordance with AMS 2301.

Korea AD: At the time of the filing of the petition, there was an existing antidumping duty order on certain cut-to-length carbon-quality steel plate products from Korea. See Notice of Final Determination of Sales at Less Than Fair Value: Certain Cut-To-Length Carbon-Quality Steel Plate Products from Korea, 64 FR 73196 (Dep't Commerce Dec. 29, 1999), as amended, 65 FR 6585 (Dep't Commerce Feb 10, 2000) (1999 Korea AD Order). The scope of the antidumping duty investigation with regard to cut-to-length plate from Korea covers only (1) subject cut-to-length plate not within the physical description of cut-to-length carbon quality steel plate in the 1999 Korea AD Order, regardless of producer or exporter; and (2) cut-to-length plate produced and/or exported by those companies that were excluded or revoked from the 1999 Korea AD Order as of April 8, 2016. The only revoked or excluded company is Pohang Iron and Steel Company, also known as POSCO.

Korea CVD: At the time of the filing of the petition, there was an existing countervailing duty order on certain cut-to-length carbon-quality steel plate from Korea. See Final Affirmative Countervailing Duty Determination: Certain Cut-to-Length Carbon-Quality Steel Plate From the Republic of Korea, 64 FR 73176 (Dep't Commerce Dec. 29, 1999), as amended, 65 FR 6587 (Dep't Commerce Feb. 10, 2000) (1999 Korea CVD Order). The scope of the countervailing duty investigation with regard to cut-to-length plate from Korea covers only (1) subject cut-to-length plate not within the physical description of cut-to-length carbon quality steel plate in the 1999 Korea CVD Order regardless of producer or exporter, and (2) cut-to-length plate produced and/or exported by those companies that were excluded or revoked from the 1999 Korea CVD Order as of April 8, 2016. The only revoked or excluded company is Pohang Iron and Steel Company, also known as POSCO.

China: Excluded from the scope of the antidumping duty investigation on cut-to-length plate from China are any products covered by the existing antidumping duty order on certain cut-to-length carbon steel plate from the People's Republic of China. See Suspension Agreement on Certain Cut-to-Length Carbon Steel Plate From the People's Republic of China; Termination of Suspension Agreement and Notice of Antidumping Duty Order, 68 FR 60081 (Dep't Commerce Oct. 21, 2003), as amended, Affirmative Final Determination of Circumvention of the Antidumping Duty Order on Certain Cut-to-Length Carbon Steel Plate From the People's Republic of China, 76 FR 50996, 50996-97 (Dep't of Commerce Aug. 17, 2011). On August 17, 2011, the U.S. Department of Commerce found that the order covered all imports of certain cut-to-length carbon steel plate products with 0.0008 percent or more boron, by weight, from China not meeting all of the following requirements: aluminum level of 0.02 percent or greater, by weight; a ratio of 3.4 to 1 or greater, by weight, of titanium to nitrogen; and a hardenability test (i.e., Jominy test) result indicating a boron factor of 1.8 or greater.

The products subject to the investigations are currently classified in the Harmonized Tariff Schedule of the United States (HTSUS) under item numbers: 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000.

The products subject to the investigations may also enter under the following HTSUS item numbers: 7208.40.6060, 7208.53.0000, 7208.90.0000, 7210.70.3000, 7210.90.9000, 7211.19.1500, 7211.19.2000, 7211.19.4500, 7211.19.6000, 7211.19.7590, 7211.90.0000, 7212.40.1000, 7212.40.5000, 7212.50.0000, 7214.10.0000, 7214.30.0010, 7214.30.0080, 7214.91.0015, 7214.91.0060, 7214.91.0090, 7225.11.0000, 7225.19.0000, 7225.40.5110, 7225.40.5130, 7225.40.5160, 7225.40.7000, 7225.99.0010, 7225.99.0090, 7226.11.1000, 7226.11.9060, 7226.19.1000, 7226.19.9000, 7226.91.0500, 7226.91.1530, 7226.91.1560, 7226.91.2530, 7226.91.2560, 7226.91.7000, 7226.91.8000, and 7226.99.0180.

The HTSUS subheadings above are provided for convenience and customs purposes only. The written description of the scope of the investigations is dispositive.[45] [46]

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[45] *Certain Carbon and Alloy Steel Cut-to-Length Plate From Austria, Belgium, Brazil, the People's Republic of China, France, the Federal Republic of Germany, Italy, Japan, the Republic of Korea, the Republic of South Africa, Taiwan, and Turkey: Final Scope Comments Decision Memorandum*, U.S. Department of Commerce, International Trade Administration, November 29, 2016; *Decision Memorandum for the Preliminary Affirmative Determination: Countervailing Duty Investigation of Certain Carbon and Alloy Steel Cut-to-Length Plate from the People's Republic of China*, U.S. Department of Commerce, International Trade Administration, September 6, 2016; *Decision Memorandum for the Preliminary Negative Determination: Countervailing Duty Investigation of Certain Carbon and Alloy Steel*

(*continued*...)

Tariff treatment

Based on the scope set forth by the Department of Commerce, information available to the Commission indicates that the merchandise subject to these investigations are principally imported under the following provisions of the 2016 Harmonized Tariff Schedule ("HTS"): 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1115, 7225.40.1180, 7225.40.1190, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000.[47] [48] The HTS provides a general duty rate of free for all of the HTS provisions covering these goods. Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

THE PRODUCT[49]

Description and applications

CTL plate, for the purposes of this proceeding, is a flat-rolled or press-forged carbon or alloy steel product that is 4.75 millimeters or more in thickness. Although there is no upper limit on the thickness of CTL plate that is within scope, the great majority of CTL plate produced in the United States is two inches or less in thickness. CTL plate is available in a variety of widths, thicknesses, and shapes incorporated into other products or further processed into products. The term "cut-to-length" refers to a flat plate product with a defined length.

(…*continued*)
Cut-to-Length Plate from the Republic of Korea, U.S. Department of Commerce, International Trade Administration, September 6, 2016.

[46] Previous CTL plate investigations included only carbon and/or micro-alloy steel plate while these investigations include both carbon steel and alloy steel plate.

[47] Tool/high speed steel are principally imported under the following provisions: 7225.40.1110; 7225.40.1180; and 7226.20.0000. Effective January 1, 2016, HTS statistical reporting numbers 7225.40.1115 and 7225.40.1190 were discontinued and replaced by 7225.40.1180.

[48] Subject merchandise may also enter under statistical reporting numbers 7208.40.6060, 7208.53.0000, 7208.90.0000, 7210.70.3000, 7210.90.9000, 7211.19.1500, 7211.19.2000, 7211.19.4500, 7211.19.6000, 7211.19.7590, 7211.90.0000, 7212.40.1000, 7212.40.5000, 7212.50.0000, 7214.10.0000, 7214.30.0010, 7214.30.0080, 7214.91.0015, 7214.91.0060, 7214.91.0090, 7225.11.0000, 7225.19.0000, 7225.40.5110, 7225.40.5130, 7225.40.5160, 7225.40.7000, 7225.99.0010, 7225.99.0090, 7226.11.1000, 7226.11.9060, 7226.19.1000, 7226.19.9000, 7226.91.0500, 7226.91.1530, 7226.91.1560, 7226.91.2530, 7226.91.2560, 7226.91.7000, 7226.91.8000, and 7226.99.0180. HTS statistical reporting numbers 7225.40.5110, 7225.40.5160, 7226.91.1560, and 7226.91.2560 cover tool/high speed steel CTL plate, 7226.91.0500 covers chipper knife steel CTL plate, and 7225.40.5130, 7226.91.1530, and 7226.91.2530 cover ball bearing steel CTL plate.

[49] Unless otherwise noted, the source for information in this section is *Cut-to-Length Carbon Steel Plate from China, Russia, and Ukraine, Investigation Nos. 731-TA-753, 754, and 756 (Third Review)*, USITC Publication 4581, December 2015, pp. I-23 – I-31.

Most plate is used in load-bearing and structural applications, such as agricultural and construction equipment (*e.g.*, cranes, bulldozers, scrapers, and other tracked or self-propelled machinery); bridges; machine parts (*e.g.*, the body of the machine or its frame); electricity transmission towers and light poles; buildings (especially nonresidential); and heavy transportation equipment, such as railroad cars (especially tank cars) and ships. The production of tanks, sills, floors, offshore drilling rigs, pipes, petrochemical plant and machinery, various other fabricated pieces, utility applications, such as wind towers, and pressure vessels also use plate.

The product scope also includes wide flat steel bar at least 150 mm (5.9 inches) in width. Wide flat bar is a hot-rolled product made in various lengths and widths, usually starting at 1/8 inch (3.175 mm) in thickness although only bar at least 3/16 inch (4.75 millimeters) in thickness is within the product scope. It is often used in structural and transportation applications, such as for bridges and trailers.

There are certain low-volume types of CTL plate with specific applications noted below in table I-6.

Table I-6
CTL plate: Selected types and applications

Item	Description	Typical applications
Tool steel plate	Alloy steels that typically have higher carbon levels than standard carbon-quality steels as well as alloying elements which increase steel hardness but makes the steel more susceptible to cracking (in other words, the steel is more brittle). Tool steels are generally heat treated to reduce the brittleness of the steel as well as to impart desired characteristics. These steel have one or more of the following qualities; increased hardness, wear-resistance, or resistance to softening at elevated temperature.	Cutting tools for machining or cutting metals and for metal-casting or forging dies.
High-speed steel plate	Alloy steel that resists softening and maintain a sharp cutting edge at high service temperatures. These steels contain relatively high levels of tungsten or molybdenum and are used for steady, high-load conditions rather than shock loads.	Cutting tools such as drills, milling tools, etc.
Mold steel plate	Alloy steel whose primary alloying elements are chromium, nickel, aluminum and molybdenum, depending on the type of mold steel.	Plastic-molding and zinc die-casting dies
X-70 plate	Carbon steel with low levels of titanium and may contain low levels of niobium and vanadium	Pipe suitable for use in conveying gas, water, and oil in the oil and natural gas industries

Source: American Iron and Steel Institute, *Steel Products Manual: Tool Steels*, p 1, table 1, pp. 14, 15, 20, September 1981. American Petroleum Institute ("API"), *Specification for Line Pipe,* p. 1 and tables 4 and 5, October 2008.

Manufacturing processes

In general, there are three distinct processing stages, summarized below, for hot-rolled nonalloy and alloy steel products, including: (1) melting or refining steel, (2) casting steel into semi-finished forms, and (3) hot processing semi-finished forms into flat-rolled hot-rolled steel mill products.

Melt stage

The integrated and the nonintegrated processes are two methods used to produce steel.[50] In the integrated process, a blast furnace smelts iron ore with coke to produce molten iron. The molten iron pours into a steelmaking furnace, generally a basic oxygen furnace, together with a small amount of scrap metal. Oxygen blown into the furnace processes the molten metal into steel. In the nonintegrated process, an electric arc furnace melts scrap and primary iron products (such as pig iron or direct-reduced iron) to produce molten steel. Tool steel is produced by electric arc furnaces.[51]

Whether produced by the integrated or nonintegrated process, molten steel is poured or "tapped" from the furnace into a ladle to be transported to casting. It is common for steelmakers to utilize a secondary steelmaking stage (a ladle metallurgy station) to refine the product further into extra-clean or low-carbon steels satisfying stringent surface or internal requirements or micro cleanliness quality and mechanical properties before casting. Steelmakers may adjust the chemical content by adding alloying elements, lowering the carbon content (decarburization), or adjusting the temperature of the molten steel for optimum casting. Thus, the melt stage establishes the essential physical properties of the steel.

Unless otherwise specified, CTL plate refers to cut-to-length carbon and alloy steel plate and wide flat bar. For the purposes of these reviews, alloy steel CTL plate includes all alloyed steel except stainless steel. Some plate mills, such as Evraz and JSW Steel USA, do not make their own steel. Instead, they roll plate from purchased slabs.[52] The production process for these mills does not include the melting and casting stages and begins at the rolling stage described later in this section.

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[50] American Iron and Steel Institute, "How Steel is Made," http://www.steel.org/Making%20Steel/How%20Its%20Made.aspx, accessed on November 7, 2016.

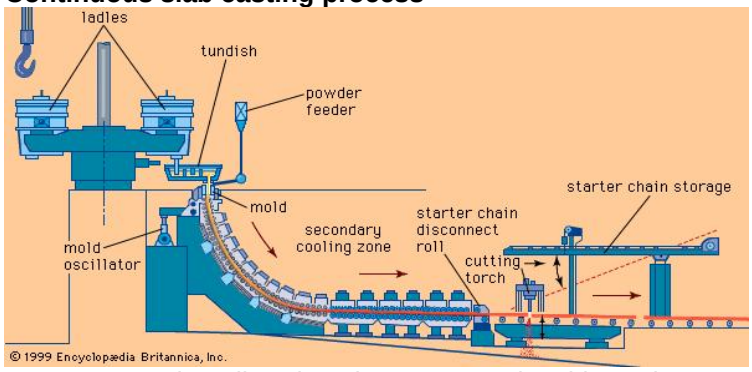
[51] Hearing transcript, p. 192 (O'Hara).

[52] See Evraz, "Evraz Portland Rolling Mill," found at http://www.evrazna.com/LocationsFacilities/OregonSteel/RollingMill/tabid/155/Default.asp, accessed on November 7, 2016; JSW Steel USA, "About Us: Plate Division," found at http://www.jswsteel.us/company_Plate_Division.shtml, accessed on November 7, 2016.

Casting stage

The casting stage follows the melting stage, which casts the molten steel into a form suitable for the rolling process. Two principal methods of casting are used: continuous slab casting[53] and ingot casting. Continuous slab casting (figure I-1) is the more common, preferred, and lower-cost method used to produce plates up to approximately four inches in thickness. Ingot casting (figure I-2) is used to produce thicker plates, because the continuous cast process cannot produce slabs of sufficient thickness. The ArcelorMittal operation in Coatesville, Pennsylvania and the former Joy Global plate mill in Texas currently owned by Nucor use ingot casting to produce very thick plate.[54] Ingot casting is also used for tool steel CTL plate production.[55]

Figure I-1
Continuous slab casting process



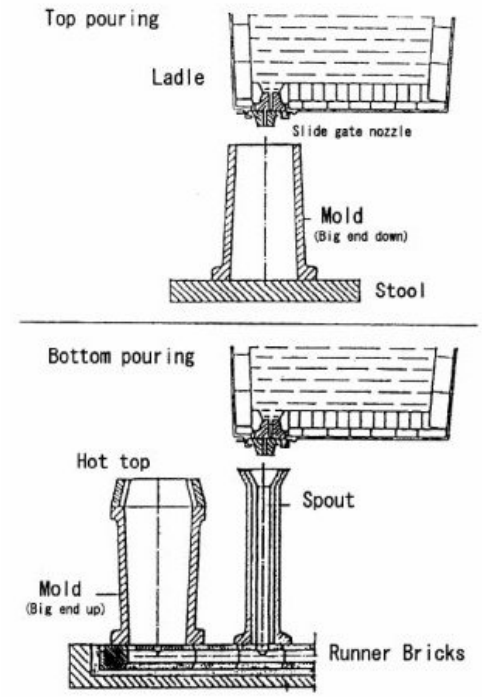
Source: Encyclopedia Britannica, "A Curved Mold Continuous Slab Caster," 1999 http://www.britannica.com/science/metallurgy/images-videos/A-curved-mold-continuous-slab-caster/1541, retrieved April 27, 2016.

[53] Wide flat bar production uses billets as the form suitable for the rolling process. Billets can range from two to seven inches.

[54] ArcelorMittal, "ArcelorMittal Coatesville," http://usa.arcelormittal.com/Our-operations/Steelmaking/Coatesville/, accessed November 7, 2016; Nucor, press release, "Nucor to Acquire Plate Mill in Texas,". http://nucor.com/investor/news/print/?rid=2186905, accessed November 7, 2016. The news release states, "The mill produces specialty plate products with the capability of producing plate that can range from 1 to 12 inches thick and up to 138 inches wide." Although the Nucor press release does not explicitly state that this mill produces CTL plate from ingots, very thick CTL plate must be produced from ingots.

[55] Tool steel's relatively high carbon content and its alloying elements make it stronger and less ductile than carbon steel. The continuous casting process requires the casted steel to bend (see figures I-1 and I-2) and so is not used in tool steel CTL plate production. Tool steel respondents' prehearing brief, exh. 3, p. 5.

Figure I-2
Top and bottom pouring ingot casting

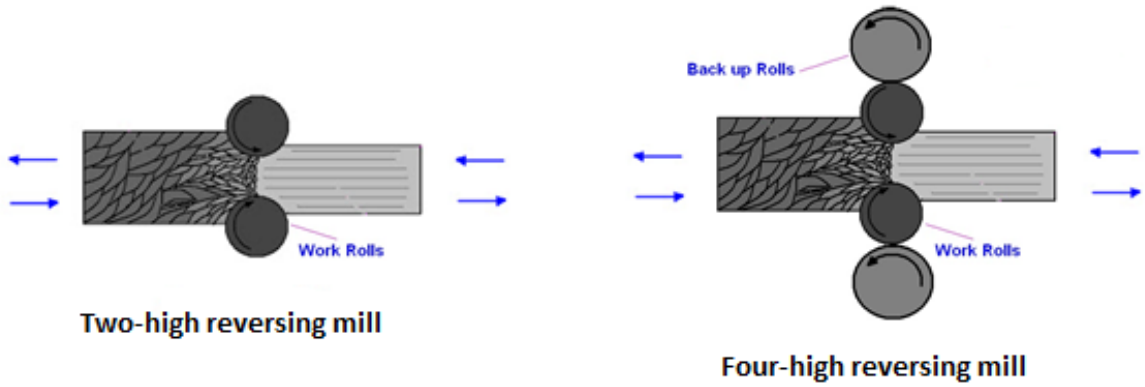


Source: Steel Data, "Non-Metallic Inclusions in Steel: Top pouring and bottom pouring for conventional ingot casting," http://www.steeldata.info/inclusions/demo/help/ingot.html, retrieved April 27, 2016.

Hot-processing stage

Most CTL plate is hot-rolled on a reversing plate mill (also called a sheared plate mill) consisting of one or two reversing hot-rolling mill stands and associated equipment. If there are two stands, the first is the roughing mill and the second is the finishing mill. The roughing mill is equipped with special tables in front of and behind the mill to rotate the plate one-quarter turn between rolling passes in order to allow cross rolling, increasing the width rather than the length of the plate as the thickness reduces. After reaching the desired finished width, the plate is again rotated one-quarter turn and rolled straightaway to the finished thickness. Reversing mills for plate production are typically either two or four parallel rolls high (figure I-3). The rollers that touch the plate are work rolls. Thicker plate requires backup rolls parallel to the work rolls, to provide rigidity to the work rolls, as shown on the four-high rolling mill. Reversing mills in the United States generally produce plate ranging from 0.187 to 20 inches (4.75 to 508 mm) in thickness and from 48 to 154 inches (1,219 to 3,912 mm) in width.

Figure I-3
Two-high and four-high reversing mills

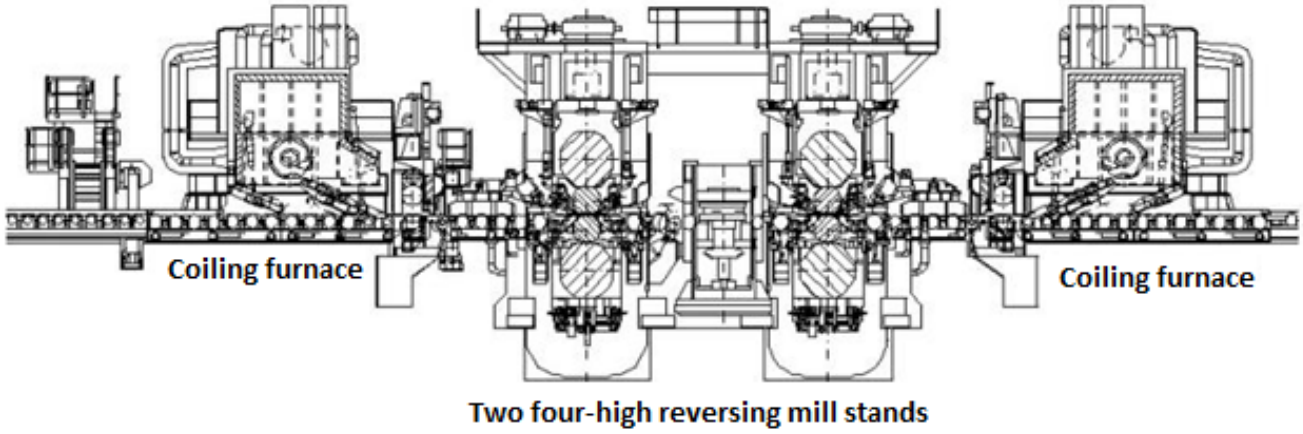


Source: Mechanical Engineering, "Types of Rolling Mills," http://engineeringhut.blogspot.com/2010/10/types-of-rolling-mills.html, accessed April 27, 2016.

Some reversing plate mills (known as "Steckel mills") are equipped with coilers on each side of the finishing mill that operate inside small heating furnaces, keeping the steel hot and allowing the production of much longer or thinner plates (figure I-4).[56] If the coilers are not used then the mill operates like a conventional reversing plate mill. Steckel mills are equipped with coilers at the end of the line to produce coiled plate as well as in-line shearing facilities. The hot-rolled coils produced by the Steckel mill can be moved to a separate line to be uncoiled, flattened, and cut to length as plate. Plate produced in a Steckel mill typically ranges from 0.187 to 0.750 inches (4.75 to 19.1 mm) in thickness and 48 to 96 inches (1,219 to 2,438 mm) in width, although some mills can produce wider plate.

[56] China Advanced Steel Technologies and Engineering, "Steckel Mill Consulting," accessed April 27, 2016 http://www.castellc.com/Steckel-Mill-Consulting.html.

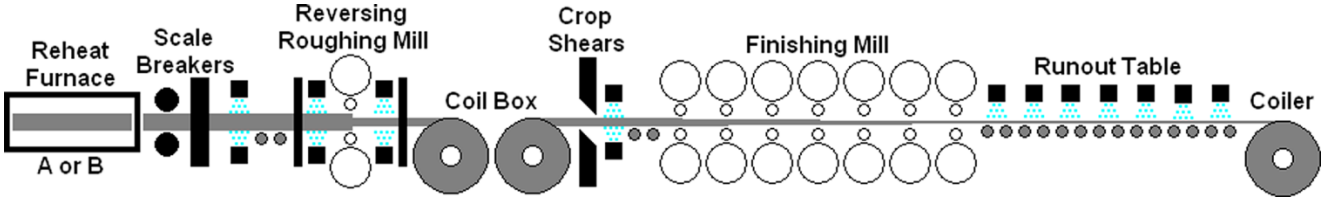
Figure I-4
Steckel mill



Source: China Advanced Steel Technologies and Engineering, "Steckel Mill Consulting," accessed on April 27, 2016, http://www.castellc.com/Steckel-Mill-Consulting.html.

In addition to reversing plate mills, a continuous hot-strip mill can roll plate (figure I-5). Such a mill has either a reversing rougher or a number (usually four or five) of non-reversing roughing mills followed by a finishing section consisting of a series of mill stands, usually six, spaced close together so that a plate is rolled continuously in a single pass in one direction. The finished plate is coiled, discharged from the mill, allowed to cool, then uncoiled, flattened, and cut to length on a separate processing line. Continuous hot-strip mills primarily produce hot-rolled sheet, although they may also produce plate up to one inch in thickness.[57]

Figure I-5
Continuous hot-strip mill



Source: Evans, Kennedy and Thomas, "Process Parameters Influencing Tertiary Scale Formation at a Hot Strip Mill Using a Multinomial Logit Model," May 2012, http://manufacturingscience.asmedigitalcollection.asme.org/article.aspx?articleid=1691718.

[57] ArcelorMittal, "What We Do: Plate Products," http://usa.arcelormittal.com/What-we-do/Steel-products/Plate/, accessed August 25, 2015.

Key differences in the various rolling methods

Because of its capability to cross roll, a reversing mill is somewhat flexible with regard to the slab width used to produce a given plate width. Steckel mills and continuous hot-strip mills can only use slabs that are slightly wider than the desired width of the final plate. However, they have the advantage of being able to roll longer, heavier slabs than could be used on a reversing plate mill. Plate from a reversing mill is preferred for welded load-bearing and structural applications because of its generally thicker dimensions. These applications include bridgework; machine parts (*e.g.*, the body of the machine or its frame); transmission towers and light poles; buildings; mobile equipment (*e.g.*, cranes, bulldozers, scrapers, and other tracked or self-propelled machinery); and heavy transportation equipment, such as railroad cars (especially tanker cars) and oceangoing ships. End users concerned about "coil set memory" (*e.g.*, users that cut parts from plate) may prefer plate from a reversing mill because the edges of plate cut from coils from hot-strip and Steckel mills may curl on heating.

Plate producers may have several types of mills at a single steel facility. In such facilities, the reversing plate mill is usually separated from the hot-strip mill and the Steckel mill and employs different production workers.

Wide flat bar is produced by rolling a billet through a series of bar mills which roll the material horizontally and vertically, until the final dimensions are achieved.

Tool steel CTL plate is often press forged as its high strength and low ductility can make it difficult to roll, especially if the tool steel is of a grade that contains high levels of alloying elements. The tool steel can be press forged to its final shape or it can be press forged and then rolled to its final shape (the initial forging makes the steel easier to roll). Tool steel can also be rolled on a rolling mill without initially being press forged, especially if the steel is of a type with relatively low levels of alloying elements.[58]

Patterns in relief

Most CTL plate is smooth on both sides, and by definition the product scope excludes plate with "patterns in relief" if produced on a universal mill.[59] "Patterns in relief," a non-skid pattern of raised figures at regular intervals on one surface of the plate, are typically found on floor plate. However, mills other than universal mills are able to produce floor plate with patterns in relief. A continuous hot-strip mill makes floor plate by placing an embossed roll in the final stand of the continuous mill, while a Steckel mill makes floor plate by holding the hot plate on one of the Steckel furnaces at the mill after completing all but the final rolling pass. Then one roll is exchanged for an embossed roll, and the final rolling pass is completed.

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[58] Staff telephone interview with ***.

[59] A universal mill is a mill capable of simultaneously rolling between both horizontal and vertical rolls. Universal mill plate is defined in HTSUS Chapter 72 Additional U.S. Note 1(b) as follows: Flat-rolled products rolled on four faces or in a closed box pass, of a width exceeding 150 mm but not exceeding 1,250 mm and of thickness of not less than 4 mm, not in coils and without patterns in relief.

Heat treatment

After the CTL plate is made, it can be heat treated, subjected to a series of temperature changes to increase its hardness, strength, or ductility, thereby allowing the plate to be used in additional applications.[60] The amount of time spent at the various temperatures and the rates of cooling can vary depending on the characteristics desired for the plate. Some examples of heat treatments are normalizing, quenching, and quench and temper. Normalizing involves heating the steel to about 1,670 degrees Fahrenheit followed by slow cooling such as cooling in air. This process increases the toughness of steel for applications requiring pressure vessel quality. Quenching involves heating the steel to the required temperature, holding at that temperature for the necessary time to produce the desired steel qualities, and then immediate cooling of the steel. Quench and temper includes heating of the steel to the required temperature, rapid cooling, and reheating (commonly to 400-1,300 degrees) before cooling again, which makes the steel tougher and more ductile.[61]

CTL plate manufacturing specifications

CTL plate is produced to meet a variety of manufacturing standards. In the United States, one of the commonly used manufacturing standards is developed by ASTM International. The standards set by ASTM International are voluntary and cover many different factors such as dimensions, chemistry, manufacturing process, testing procedures, etc. Customers and producers can agree to use a manufacturing specification such as an ASTM specification "as is," may agree to a specification but with certain adjustments, or can agree to their own set of specifications.

Service centers

Steel service centers traditionally have served as distributors of plate and typically do not have their own plate mills. Some service centers also perform a wide range of value-added processing of many steel products, such as uncoiling, flattening, and cutting plate products to length or flame/plasma cutting plate into non-rectangular shapes. Service centers that process coiled plate into cut lengths or non-rectangular shapes may utilize coiled plate from U.S. or foreign mills.

[60] Standard commodity-grade CTL plate is not typically heat-treated while alloy steel CTL plate is frequently heat treated.

[61] The source of heat treating information is ArcelorMittal, *Guidelines for Fabricating and Processing Plate Steel*, April 2015.

DOMESTIC LIKE PRODUCT ISSUES

The Commission's decision regarding the appropriate domestic products that are "like" the subject imported product is based on a number of factors including: (1) physical characteristics and uses; (2) common manufacturing facilities and production employees; (3) interchangeability; (4) customer and producer perceptions; (5) channels of distribution; and (6) price. The petitioners contend that the domestic like product should mirror the definition of the subject merchandise and also be defined as all of CTL plate.

In its 1996 investigations of CTL plate from China, Russia, South Africa, and Ukraine, the Commission defined the domestic like product as all CTL carbon steel plate products, consisting of CTL plate produced by U.S. mills or cut from coiled plate by service centers. In the first five-year review, the Commission modified the definition of the domestic like product to include micro-alloy steel CTL plate since it shared physical characteristics, manufacturing equipment and employees, and channels of distribution of carbon steel CTL plate, and was also interchangeable with carbon steel CTL plate. In the second and third five-year reviews, the Commission continued to find the domestic like product to consist of CTL carbon steel plate, including micro-alloy steel CTL plate.[62]

In its 1999 investigations of CTL carbon steel plate from India, Indonesia, Italy, Japan, and Korea, the Commission defined the domestic like product to be coextensive with the scope of the investigations, which consisted of all CTL carbon-quality steel plate, including X-70 plate, micro-alloy steel plate, and plate cut from coils.[63]

In this current proceeding, the petitions and Commerce's scope include alloy steel CTL plate.[64] Petitioners contend that there are no clear dividing lines between X-70 grade CTL plate ("X-70") and other CTL plate and that X-70 should be considered to be "part of {the} continuum of individual, unique products with varying chemistries, mechanical properties, and other characteristics that make up CTL plate."[65] French, German, Japanese, and Korean respondents, however, argued that X-70 should be a separate domestic like product because the technical specifications, conditions of competition, import trends, and domestic sales data for this type of CTL plate are unique.[66]

The Commission found the domestic like product to be coextensive with Commerce's scope in the preliminary phase of these investigations. Specifically, the Commission concluded:

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[62] *Cut-To-Length Carbon Steel Plate from China, Russia, and Ukraine, Investigation Nos. 731-TA-753, 754, and 756 (Third Review)*, USITC Publication 4581, December 2015, pp. 8-9.

[63] *Cut-To-Length Carbon-Quality Steel Plate from India, Indonesia, Italy, Japan, and Korea, Investigation Nos. 701-TA-388-391 and 731-TA-817-821 (Second Review)*, USITC Publication 4296, December 2011, p. 7.

[64] Petition, Vol. I, p. 23; 81 FR 27096-27098.

[65] The petitioners also note that the Commission has recognized that X-70 is not a separate like product from other CTL plate. ArcelorMittal's prehearing brief, p. 5; ArcelorMittal's posthearing brief, p. 3.

[66] Conference transcript, p. 20 (Horgan); French and German respondents' postconference brief, p. 3; Japanese respondents' postconference brief, p. 7; POSCO's postconference brief, p. 4.

> The record of these preliminary phase investigations indicates that there is not a clear dividing line between carbon steel and alloy steel CTL plate. The two products share certain physical characteristics; there is at least some interchangeability between them; and they are produced using the same manufacturing facilities, production processes, and employees; and are sold in the same channels of distribution. Moreover, customers and producers do not perceive a clear dividing line between carbon steel and alloy steel CTL plate. In view of the foregoing, we find that carbon steel and alloy steel CTL plate are not separate domestic like products.[67]

The Commission also concluded that:

> The record of the preliminary phase of these investigations does not indicate the existence of a clear dividing line between X-70 CTL plate and all other CTL plate. The record indicates that X-70 CTL plate shares common manufacturing facilities and channels of distribution with other CTL plate products. It is not the sole CTL plate product used to produce large diameter line pipe. While X-70 CTL plate has distinctive characteristics that limit its interchangeability with other CTL plate, causing it to be perceived somewhat differently by purchasers and priced higher than most other CTL plate products, the record indicates that it is not the only CTL plate product with such distinctive characteristics. Moreover, many of the distinctions respondents cite are between imported X-70 CTL plate and domestically produced CTL plate products, and not between different domestically produced CTL plate products. The Commission's domestic like product analysis focuses on distinctions between domestically produced products. When the scope definition contains numerous different items with some distinctive characteristics, the Commission generally does not consider each item of the merchandise to be a separate like product.[68]

In the final phase of these investigations, the Commission requested parties to review and provide suggestions on draft questionnaire. The petitioners contend that the domestic like product is co-extensive with the scope of these investigations.[69] POSCO continued to argue that X-70 should be treated as a separate domestic like product in its comments on draft questionnaires[70] but did not pursue the argument in its briefs.[71] In addition, several

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[67] *Cut-To-Length Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey, Investigation Nos. 701-TA-559-561 and 731-TA-1317-1328 (Preliminary)*, USITC Publication 4615, May 2016, p. 15.

[68] Ibid., pp. 16-17.

[69] ArcelorMittal USA's prehearing brief, p. 4; ArcelorMittal USA's posthearing brief, p. 2. Nucor and SSAB support ArcelorMittal's arguments regarding the domestic like product. Nucor's prehearing brief, p. 3; SSAB's prehearing brief, p. 11; Nucor's posthearing brief, Answers' to Commissioners' Questions, p. 22.

[70] *POSCO's Comments on Draft Questionnaires*, September 13, 2016, p. 4.

[71] POSCO's prehearing brief, p. 11.

respondents initially argued that the Commission should collect information to allow it to consider whether tool steel and high speed steel CTL plate should constitute a separate domestic like product.[72] These respondents subsequently argued that subsets of tool steel CTL plate, in addition to high speed steel, such as mold steel, chipper knife steel, and ball bearing steel ("tool steel") should together constitute a separate domestic like product.[73] [74] These respondents ("tool steel respondents")[75] note that tool steel constitutes a separate domestic like product from other types of CTL plate because tool steel has "distinct chemical properties, physical characteristics, mechanical properties, end uses, producers, manufacturing facilities, production processes and employees, channels of distribution, customer and producer perceptions, and costs of production and prices."[76]

Physical characteristics and uses

According to the HTSUS, CTL plate made to tool steel specification contains varying degrees of carbon mixed with varying amounts of chromium, manganese, molybdenum, and tungsten.[77] The petitioners contend that tool steel is carbon and alloy steel with physical characteristics that are suited to the production of tools because of their hardness, resistance to abrasion, and ability to hold a cutting edge at elevated temperatures. These elements can also be found in various other alloy steel on a continuum. The petitioners argue that the Commission's preliminary finding that carbon steel and alloy steel CTL plate share basic physical characteristics equally to tool steel when compared to other types of CTL plate. Therefore, the petitioners believe that the Commission should determine that these elements of tool steel impart a specific "range of physical and mechanical characteristics, such as varying yield strength, tensile strength, hardness, work-hardening ability, heat treatability, machinability, and surface quality" that is needed for certain tool steel applications.[78]

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[72] These respondents also provided definitions of tool steel and high speed steel CTL plate, which were taken from the HTSUS. *Deutsche Edelstahlwerke's Comments on Draft Questionnaires*, September 13, 2016, pp. 2-3; *Hitachi Metals' Comments on Draft Questionnaires*, September 13, 2016, pp. 1-3; and *voestalpine's Comments on Draft Questionnaires*, September 13, 2016, pp. 2-3.

[73] Tool steel respondents' prehearing brief, pp. 3-4; tool steel respondents' posthearing brief, p. 3.

[74] A summary of data collected in these investigations regarding the tool steel industry is presented in app. C, table C-2.

[75] Tool steel respondents include Hitachi, Hitachi Metals America LLC, voestalpine, voestalpine USA Corporation, Böhler Edelstahl, Bohler Bleche, Bohler Uddeholm Corporation, Friedr. Lohmann, Dillinger Huettenwerke AG, Dillinger France, and Daido.

[76] Tool steel respondents' prehearing brief, p. 1.

[77] HTSUS, Ch. 72, Subheading Note 1(d).

[78] *Carbon and Alloy Steel Cut-To-Length Plate from Austria, Brazil, Belgium, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey*, *Investigation Nos. 701-TA-560-561 and 731-TA-1317-1328 (Preliminary)*, USITC Publication 4615, May 2016, p. 14; ArcelorMittal USA's prehearing brief, p. 11, n.8; hearing transcript, p. 29 (Cannon); ArcelorMittal USA's posthearing brief, p. 3, Response to Commissioner's Questions, p. 12; Nucor's posthearing brief, Answers' to Commissioners' Questions, pp. 27-28.

Tool steel respondents argue that tool steel CTL plate is a specialty alloy steel that has a significantly different chemical composition from other types of CTL plate, primarily in terms of its carbon, chromium, manganese, molybdenum, and tungsten content.[79] In addition, tool steel has certain mechanical properties in varying degrees, which distinguishes it from other types of CTL plate. These properties include wear resistance, toughness, hot or red hardness (the ability to resist softening at elevated temperatures), hardness, machinability (the ability of tool steel to be formed into a tool), grindability, and polishability.[80] Tool steel respondents further contend that tool steel CTL plate has specific end uses and applications from other types of CTL plate since it "is used for cutting, pressing, extruding, and coining of metals and other materials; forming tools, such as dies, molds, blades; and the stamping of surfaces of machinery. The unique chemical and mechanical properties of tool steel are necessary for these specialized uses and other types of plate cannot be used for these purposes."[81]

Manufacturing facilities and production employees

The petitioners contend that tool steel and other types of CTL plate are made on the same equipment at the same plants and by the same workers.[82] ArcelorMittal USA, for example, noted that it produces ***. ArcelorMittal USA also explained that tool steel CTL plate and other types of CTL plate are made in the same melt shop, rolled on the same rolling mills, and heat-treated in the same heat treat facilities. In addition, ***.[83]

Tool steel respondents contend that tool steel CTL plate is produced by nearly entirely different companies and production facilities as other types of CTL plate.[84] Additionally, they explain that tool steel production utilizes different processes than other types of CTL plate, including "specialized equipment, expensive alloying ingredients, and unique quality control processes in order to achieve their complex metallurgical and physical requirements. Tool steel manufacturing takes place under carefully controlled conditions to produce the required

[79] Tool steel respondents' prehearing brief, pp. 18-19; hearing transcript, pp. 190-191 (O'Hara); tool steel respondents' posthearing brief, p. 4.

[80] Tool steel respondents also note that other types of CTL plate can have machinability, grindability and polishability, but not in combination with the other listed properties. Tool steel respondents' prehearing brief, p. 24.

[81] Tool steel respondents also explain that other types of CTL plate are used in load-bearing and structural applications such as agricultural and construction equipment, bridges, machine parts, buildings, and heavy transportation equipment, which do not require the specialized mechanical properties of tool steel. Ibid., pp. 23-24, 26-27; hearing transcript, p. 191 (O'Hara), 195 (Vaughn).

[82] ArcelorMittal USA's posthearing brief, pp. 3-4, Response to Commissioners' Questions, p. 13; Nucor's posthearing brief, Answers to Commissioners' Questions, p. 31.

[83] Ibid.; hearing transcript, p. 111 (Insetta).

[84] For example, tool steel respondents contend that ***. Tool steel respondents' prehearing brief, p. 30.

quality."[85] Furthermore, tool steel is subject to numerous operations such as grinding, turning, and straightening to ensure its compliance with more stringent specifications.[86]

There is limited overlap of producers of high volume CTL plate and low-volume CTL plate. There were *** reporting U.S. producers of tool steel, ***, with shipments of *** short tons, and *** reporting U.S. producers of high-speed steel, ***, with combined U.S. shipments of *** short tons in 2015.[87]

Interchangeability

The petitioners argue that although there is a lack of interchangeability between tool steel and other types of CTL plate, it is generally not possible to substitute different grades of tool steel plate for one another.[88] Therefore, the fact that they are not interchangeable does not indicate that they separate domestic like products.[89]

Tool steel respondents argue that tool steel CTL plate and other types of CTL plate are not interchangeable due to their different chemical and physical properties, and end uses. In particular, the specialized properties of tool steel, which are engineered to satisfy different requirements, are not needed for most applications of other types of CTL plate. In addition, only tool steel can be used in certain applications. For example, only chipper steel must be used for the production of knives due to its unique and requisite physical properties; mold steel must be used for the production of plastic parts due to its conductivity and compressive strength; and high speed steel must be used for drilling and sawing applications due to its high wear resistance, compressive strength, and hardness.[90]

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[85] Tool steel respondents' prehearing brief, pp. 29, 33-34; hearing transcript, p. 192 (O-Hara); tool steel respondents' posthearing brief, p. 5. Tool steel respondents further explain that tool steel production typically "includes processes such as vacuum degassing or electro-slag remelting to remove impurities from the steel. These impurities are not removed from other" types of CTL plate. In addition, "tool steel is made via small-batch electric furnace melting from highly alloyed scrap and alloys. They are typically static cast into ingots and initial hot-working operation is forging. Carbon and other alloy steel are made in large-batch electric furnaces, or even larger batch integrated mills from pig iron and other scrap." Tool steel respondents' prehearing brief, p. 34; hearing transcript, p. 192 (O'Hara).

[86] Tool steel respondents' prehearing brief, p. 34.

[87] ***.

[88] However, Nucor explains that there is some interchangeability between tool steel and other types of CTL plate in certain instances. High carbon steels, for example, are used in a variety of blade applications and abrasion resistant steels are used in a number of cutting tool and blade applications. Nucor's posthearing brief, Answers to Commissioners' Questions, p. 28.

[89] ArcelorMittal USA's prehearing brief, pp. 11-12; ArcelorMittal USA's posthearing brief, p. 4, Response to Commissioners' Question, p. 15. ArcelorMittal USA notes that there are exceptions, however, as ***. ArcelorMittal USA's posthearing brief, Response to Commissioners' Question, p. 15, n.8.

[90] Tool steel respondents' prehearing brief, pp. 38-40; hearing transcript, p. 192 (O'Hara), 195 (Vaughn); stool steel respondents' posthearing brief, p. 6.

Customer and producer perceptions

The petitioners note that the Commission preliminarily found that carbon CTL plate and alloy steel CTL plate are perceived by the domestic industry as "comprising a single product range"[91] that includes tool steel, which constitutes a single domestic like product. ArcelorMittal USA and Nucor noted, for example, that its product brochures and specification sheets list tool steel along with other carbon and alloy grades of CTL plate.[92]

Tool steel respondents note that U.S. customers and purchasers perceive tool steel CTL plate to be separate products from other types of CTL plate since they have very demanding quality requirements. They also note that there is virtually no overlap in U.S. customers of tool steel CTL plate and other types of CTL plate since they generally serve different customer categories, and customers tend to buy tool steel CTL plate in smaller quantities than other types of CTL plate since tool steel CTL plate is used in specialty applications. Tool steel respondents further contend that U.S. producers generally consider tool steel CTL plate to be a niche specialty product and advertise tool steel CTL plate separately from other types of CTL plate if it is a product they manufacture.[93] Respondents also note that the "difficulty in manufacturing these products leads to different quality levels in the marketplace. As such, quality level, performance, and availability are the primary differentiators followed by price."[94]

Channels of distribution

The petitioners indicate that questionnaire responses show channels of distribution for tool steel and other types of CTL plate, including sales through both service centers and distributors as well as sales directly to end users as being the same. Almost half of the domestic like product went to distributors in 2015 with the remainder going to end users.[95]

Tool steel respondents indicate that tool steel CTL plate is sold in very different channels of distribution and to different costumers than other types of CTL plate. Specifically, "tool steel purchasers are predominantly producers of tools and machine dies, and small distributors that

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[91] *Carbon and Alloy Steel Cut-To-Length Plate from Austria, Brazil, Belgium, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey*, *Investigation Nos. 701-TA-560-561 and 731-TA-1317-1328 (Preliminary)*, USITC Publication 4615, May 2016, p. 15.

[92] ArcelorMittal USA's prehearing brief, p. 13; ArcelorMittal USA's posthearing brief, Response to Commissioners' Questions, pp. 17-19; Nucor's posthearing brief, Answers to Commissioners' Questions, p. 30.

[93] Tool steel respondents' prehearing brief, pp. 41-44; hearing transcript, pp. 192-193 (O'Hara); tool steel respondents' posthearing brief, p. 6. Tool steel respondents also note that the steel industry treats tool steel as a separate product by holding specialty tool steel specific trade conferences. Tool steel respondents' posthearing brief, p. 7.

[94] Hearing transcript, p. 193 (O'Hara).

[95] ArcelorMittal USA's prehearing brief, p. 12; hearing transcript, p. 30 (Cannon), 52 (Whiteman); ArcelorMittal USA's posthearing brief, p. 4, Response to Commissioners' Questions, p. 19; Nucor's posthearing brief, Answers to Commissioners' Questions, p. 29.

focus on tool steel. In contrast, other {CTL plate} is sold to large distributors and end-users in the transportation equipment, agricultural equipment, construction, and large diameter pipe sectors."[96]

U.S. tool steel producers' channels of distribution data are presented in table I-7. The *** while approximately *** during January 2013 through September 2016.

Table I-7
Tool/high speed steel CTL plate: U.S. producers' channels of distribution by product group, 2013-15, January to September 2015, and January to September 2016

* * * * * * *

Price

The petitioners argue that price does not differentiate tool steel and other types of CTL plate as the Commission found to be the case with regard to carbon steel and alloy steel CTL plate during the preliminary phase of these investigations. They note that "just as a wide range of physical characteristics within a continuum of products does not create many different separate like products, differing prices that reflect those different physical characteristics and production processes similarly do not different products within a continuum."[97] In addition, the petitioners note that there are overlapping costs for tool steel and other types of CTL plate.[98]

Tool steel respondents argue that prices of tool steel are significantly higher, on average two to four times higher, than prices of other types of CTL plate, which is due to the high alloy content and the sophisticated manufacturing processes needed to produce it. They further argue that the cost components for tool steel CTL plate are different from those of other types of CTL plate because tool steel CTL plate requires more complex manufacturing processes with higher labor and overhead costs.[99]

U.S. producer prices for product 3, the highest volume price item for which the Commission collected pricing data, ranged from $477 to $706 in 2015. U.S. producer prices for product 6, a tool steel plate price item for which the Commission collected pricing data, ranged from $*** to $*** in 2015. Using broader measures, U.S. producers' average unit value

[96] Tool steel respondents' prehearing brief, p. 45; hearing transcript, p. 193 (O'Hara), 195 (Vaughn); tool steel respondents' posthearing brief, p. 7.

[97] ArcelorMittal USA's prehearing brief, p. 13; ArcelorMittal USA's posthearing brief, p. 4, Response to Commissioners' Questions, p. 20; Nucor's posthearing brief, Answers to Commissioners' Questions, p. 32.

[98] ArcelorMittal USA's posthearing brief, Response to Commissioners' Questions, p. 20.

[99] Tool steel respondents' prehearing brief, pp. 46-47; hearing transcript, p. 193 (O'Hara), 195 (Vaughn); tool steel respondents' posthearing brief, p. 7.

for all CTL plate was $691 dollars per short ton in 2015, compared to $*** dollars per short ton for tool steel, and $*** dollars per short ton for high speed steel.

PART II: CONDITIONS OF COMPETITION IN THE U.S. MARKET

U.S. MARKET CHARACTERISTICS

CTL plate is produced from carbon and alloy steel slabs. Slabs are formed from molten steel and then typically passed through either a traditional reversing plate mill or a Steckel mill, which increases the width and reduces the thickness.[1] Alternatively, the slab may be processed into coiled plate on a hot strip mill (or a combination mill) and processed through a separate shear line. The plate is finished to the customer's specified thickness, width, and length, and sold throughout the United States.

Commodity-grade CTL plate is used in a variety of applications, such as the manufacture of storage tanks, heavy machinery and machinery parts, ships and barges, agriculture and construction equipment, and general load-bearing structures. Non-commodity grades of CTL plate have superior strength and performance characteristics as compared with commodity grades of CTL plate and typically are produced to exhibit specific properties, such as improved malleability, hardness or abrasion resistance, impact resistance or toughness, higher strength, and ease in machining and welding. Non-commodity grades of CTL plate are used to manufacture railroad cars, line pipes, mobile equipment, highway and railway bridges, wind tower and transmission poles, pressure vessels, military armor, hand tools, die sets, and machinery components.

Overall, apparent U.S. consumption of CTL plate, by quantity, was 6.0 percent lower in 2015 than in 2013 and 16.6 percent lower than in 2014. Apparent U.S. consumption of CTL plate fluctuated during 2013-15, increasing from 8.8 million short tons in 2013 to 9.9 million short tons in 2014 before decreasing to 8.3 million short tons in 2015.

U.S. PURCHASERS

The Commission issued 122 questionnaires and received 87 usable[2] questionnaire responses from firms that bought CTL plate since January 2013.[3] Nearly half of responding purchasers (43) are distributors, 30 are end users, and 15 describe themselves as other types of purchasers, including traders, resellers, service centers, fabricators, manufacturers and

[1] Certain wide flat bar may be rolled from billets to plate dimensions.

[2] One purchaser, ***.

[3] Of the 81 responding purchasers, 77 purchased domestic CTL plate, 19 purchased imports of subject merchandise from Austria, 16 purchased imports of subject merchandise from Belgium, 24 purchased imports of subject merchandise from Brazil, 20 purchased imports of subject merchandise from China, 9 purchased imports of subject merchandise from France, 31 purchased imports of subject merchandise from Germany, 23 purchased imports of subject merchandise from Italy, 30 purchased imports of subject merchandise from Japan, 35 purchased imports of subject merchandise from Korea (POSCO), 15 purchased imports of subject merchandise from South Africa, 20 purchased imports of subject merchandise from Taiwan, 20 purchased imports of subject merchandise from Turkey, 43 purchased imports of CTL plate from other sources, and 25 purchased from unknown sources.

processors. In general, responding U.S. purchasers are located in all regions of the contiguous United States, with about a third of purchasers located in the Midwest. The responding purchasers represented firms in a variety of domestic industries, including machinery, tools, and industrial equipment (23), construction (19), oil and gas (18), agricultural and electrical equipment (13), shipbuilding and marine equipment (11), rail transportation (9), wind towers (8), automotive (4), and other (14); other sectors include transmission towers, transportation equipment, press brake tooling, pressure vessel, and offshore fabricators. The largest purchasers of CTL plate from January 2013 to September 2016 were ***,[4] representing almost half of total reported purchases from January 2013-September 2016.

CHANNELS OF DISTRIBUTION[5]

U.S. producers increasingly sold to end users as compared to distributors during 2013-15. In 2015, the majority of U.S. commercial shipments of imports from Belgium, France, and Germany (as well as nonsubject countries) were to end users, while U.S. commercial shipments of imports from the other subject countries went mainly to distributors. In particular, shipments of imports from Brazil, Italy, South Africa, Taiwan, and Turkey went almost exclusively to distributors (table II-1).

[4] Purchasers *** and ***.

[5] This section discusses the channels of distribution for U.S. commercial shipments. As discussed in Parts III and Part IV, U.S. producers and importers also internally consumed CTL plate, including imports of X-70 plate for the production of line pipe.

Table II-1
CTL plate: U.S. producers' and importers' U.S. commercial shipments,[1] by sources and channels of distribution, 2013-15, January to September 2015, January to September 2016

Item	Calendar year			January-September	
	2013	2014	2015	2015	2016
Share of reported shipments (percent)					
U.S. producers' U.S. commercial shipments of CTL plate:					
Distributors	49.9	47.0	43.7	43.5	49.6
End users: Construction	24.0	24.3	25.9	25.8	24.1
End users: Other	26.1	28.7	30.5	30.7	26.3
End users: All	50.1	53.0	56.3	56.5	50.4
U.S. importers' U.S. commercial shipments of CTL plate from Austria:					
Distributors	***	***	***	***	***
End users: Construction	***	***	***	***	***
End users: Other	***	***	***	***	***
End users: All	***	***	***	***	***
U.S. importers' U.S. commercial shipments of CTL plate from Belgium:					
Distributors	***	***	***	***	***
End users: Construction	***	***	***	***	***
End users: Other	***	***	***	***	***
End users: All	***	***	***	***	***
U.S. importers' U.S. commercial shipments of CTL plate from Brazil:					
Distributors	***	***	***	***	***
End users: Construction	***	***	***	***	***
End users: Other	***	***	***	***	***
End users: All	***	***	***	***	***
U.S. importers' U.S. commercial shipments of CTL plate from China:					
Distributors	***	***	***	***	***
End users: Construction	***	***	***	***	***
End users: Other	***	***	***	***	***
End users: All	***	***	***	***	***
U.S. importers' U.S. commercial shipments of CTL plate from France:					
Distributors	***	***	***	***	***
End users: Construction	***	***	***	***	***
End users: Other	***	***	***	***	***
End users: All	***	***	***	***	***
U.S. importers' U.S. commercial shipments of CTL plate from Germany:					
Distributors	***	***	***	***	***
End users: Construction	***	***	***	***	***
End users: Other	***	***	***	***	***
End users: All	***	***	***	***	***
U.S. importers' U.S. commercial shipments of CTL plate from Italy:					
Distributors	***	***	***	***	***
End users: Construction	***	***	***	***	***
End users: Other	***	***	***	***	***
End users: All	***	***	***	***	***
U.S. importers' U.S. commercial shipments of CTL plate from Japan:					
Distributors	***	***	***	***	***
End users: Construction	***	***	***	***	***
End users: Other	***	***	***	***	***
End users: All	***	***	***	***	***

Table continued on next page.

Table II-1—Continued
CTL plate: U.S. producers' and importers' U.S. commercial shipments[1], by sources and channels of distribution, 2013-15, January to September 2015, January to September 2016

Item	Calendar year			January-September	
	2013	2014	2015	2015	2016
Share of reported shipments (percent)					
U.S. importers' U.S. commercial shipments of CTL plate from Korea (POSCO):					
Distributors	***	***	***	***	***
End users: Construction	***	***	***	***	***
End users: Other	***	***	***	***	***
End users: All	***	***	***	***	***
U.S. importers' U.S. commercial shipments of CTL plate from South Africa:					
Distributors	***	***	***	***	***
End users: Construction	***	***	***	***	***
End users: Other	***	***	***	***	***
End users: All	***	***	***	***	***
U.S. importers' U.S. commercial shipments of CTL plate from Taiwan:					
Distributors	***	***	***	***	***
End users: Construction	***	***	***	***	***
End users: Other	***	***	***	***	***
End users: All	***	***	***	***	***
U.S. importers' U.S. commercial shipments of CTL plate from Turkey:					
Distributors	***	***	***	***	***
End users: Construction	***	***	***	***	***
End users: Other	***	***	***	***	***
End users: All	***	***	***	***	***
U.S. importers' U.S. commercial shipments of CTL plate from subject countries:					
Distributors	***	***	***	***	***
End users: Construction	***	***	***	***	***
End users: Other	***	***	***	***	***
End users: All	***	***	***	***	***
U.S. importers' U.S. commercial shipments of CTL plate from Korea, other:					
Distributors	***	***	***	***	***
End users: Construction	***	***	***	***	***
End users: Other	***	***	***	***	***
End users: All	***	***	***	***	***
U.S. importers' U.S. commercial shipments of CTL plate from all other countries:					
Distributors	***	***	***	***	***
End users: Construction	***	***	***	***	***
End users: Other	***	***	***	***	***
End users: All	***	***	***	***	***

[1] These data do not account for the quantities that were internally consumed by responding firms. In 2015, internal consumption of CTL plate accounted for less than 10 percent domestic producers' U.S. shipments and U.S. shipments of imports from Austria, Belgium, China, Italy, Japan, South Africa, Taiwan, Turkey, and all other sources while it accounted for a larger share of U.S. shipments of imports from Brazil (*** percent), France (*** percent), Germany (*** percent), Korea (POSCO) (***percent), and Korea (other) (*** percent).

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

GEOGRAPHIC DISTRIBUTION

The majority of U.S. producers reported selling CTL plate to all regions in the contiguous United States (table II-2). Subject imports were also reportedly sold to all U.S. regions, although individual importers' responses were more varied. The Pacific Coast region was most frequently served by imports from China, Korea, and Taiwan. More importers reported serving the Midwest, Southeast, and Central Southwest regions than other regions.

For U.S. producers, 24.6 percent of sales were within 100 miles of their production facility, 68.7 percent were between 101 and 1,000 miles, and 6.7 percent were over 1,000 miles. Importers sold 59.2 percent of their CTL plate imports within 100 miles of their U.S. point of shipment, 34.6 percent between 101 and 1,000 miles, and 6.2 percent over 1,000 miles.

Table II-2
CTL plate: Geographic market areas in the United States served by U.S. producers and importers

	Region							
Country source	Northeast	Midwest	Southeast	Central Southwest	Mountain	Pacific Coast	Other[1]	Reporting firms
United States	16	17	16	15	12	15	2	19
Austria	6	7	6	9	6	5	4	11
Belgium	5	5	5	7	2	3	0	7
Brazil	6	9	10	11	5	4	2	15
China	9	15	11	10	7	11	2	18
France	4	3	3	2	2	2	0	4
Germany	12	13	11	15	8	8	1	17
Italy	9	10	6	10	2	2	0	12
Japan	6	10	6	11	4	5	0	17
Korea	8	9	8	12	4	9	0	18
South Africa	2	4	3	4	0	1	0	5
Taiwan	3	4	4	7	3	10	1	14
Turkey	3	5	4	6	1	1	1	11
All subject imports	37	43	39	52	24	39	6	71

[1] All other U.S. markets, including AK, HI, PR, and VI.

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

SUPPLY AND DEMAND CONSIDERATIONS

U.S. supply

Domestic production

Based on available information, U.S. producers of CTL plate have the ability to respond to changes in demand with moderate-to-large changes in the quantity of shipments of U.S.-produced CTL plate to the U.S. market. The main contributing factors to this degree of

responsiveness of supply are the availability of unused capacity, large and growing inventories, shipments to alternate markets, and the ability to produce alternate products in some mills.

Industry capacity

Domestic capacity utilization increased from 66.4 percent in 2013 to 74.1 percent in 2014 before falling to 60.3 percent in 2015.[6] This relatively low level of capacity utilization suggests that U.S. producers may have substantial ability to increase production of CTL plate in response to an increase in prices.

Alternative markets

U.S. producers' exports, as a share of total shipments, increased from 8.5 percent in 2013 to 10.6 percent in 2015, indicating that U.S. producers may have some ability to shift shipments between the U.S. market and other markets in response to price changes.[7] In the December 2015 review of CTL plate, U.S. producers stated that it would be difficult to shift shipments to other markets. U.S. producers identified transportation costs, limited foreign sales and distribution networks, and foreign producer subsidies as barriers to exporting.[8] U.S. producers reported Canada and Mexico as their principal export markets. ***.

Inventory levels

U.S. producers' ratio of inventories to total shipments increased from 9.5 percent in 2013 to 12.0 percent in 2015.[9] These inventory levels suggest that U.S. producers may have some ability to respond to changes in demand with changes in the quantity shipped from inventories.

Production alternatives

Fourteen of 21 responding U.S. producers stated that they could switch production from CTL plate to other products. Other products that producers reportedly can produce on the same equipment as CTL plate are various stainless products, hot-rolled steel coil, plate in coil, slabs, merchants, rebar, T-post, sheet, "various other long steel products that require heat treating," and "CTL sheet with thickness less than 4.75 millimeters or .187." CTL plate

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[6] Capacity utilization was 59.3 percent in January-September 2016, compared to 64.0 percent in January-September 2015.

[7] U.S. producers' exports, as a share of total shipments, were 10.3 percent in January-September 2015 and 11.6 percent in January-September 2016.

[8] *Cut-to-Length Carbon Steel Plate from China, Russia, and Ukraine, Inv. Nos. 731-TA-753,754, and 756 (Third Review)*, USITC Publication 4581, December 2015, p. II-4.

[9] U.S. producers' ratio of inventories to total shipments was 11.4 percent in January-September 2015 and 10.7 percent in January-September 2016.

represented approximately three-quarters of all the products produced on the same machinery as CTL plate in 2015.

Subject imports from subject countries[10]

Table II-3 provides a summary of supply of CTL plate from subject countries; additional data are provided in Part VII. Production capacity in Italy, Japan, South Africa, and Taiwan declined whereas production capacity in Germany, Korea, and Turkey increased. Capacity utilization increased for five of the subject countries and declined for seven. Austria, France, Germany, Japan, Korea, and Taiwan had capacity utilization rates over *** percent in 2015, while Belgium, Brazil, China, Italy, South Africa, and Turkey had capacity utilization rates of below *** percent. Some countries maintain larger inventory-to-shipments ratios than others: Belgium, France, Germany, Italy, and Turkey all had inventory-to-shipment ratios that were greater than *** percent. These ratios increased between 2013 and 2015 for 6 of the 12 subject countries. In 2015, foreign producers' home market shipments accounted for more than *** percent of shipments for Brazil, China, Germany, Italy, Japan, Korea (POSCO), South Africa, Taiwan, and Turkey while exports to third country markets accounted for more than *** percent of foreign producers' shipments in Austria, Belgium, and France.

Table II-3
CTL plate: Foreign industry factors that affect ability to increase shipments to the U.S. market

* * * * * * *

Imports from all other sources

Nonsubject imports represented *** percent of total imports of CTL plate in 2015. The largest nonsubject sources of CTL plate imports during 2013-15 were Canada, nonsubject imports from Korea, and Mexico. Canada accounted for *** percent of nonsubject imports in 2015, nonsubject imports from Mexico accounted for *** percent, and nonsubject imports from Korea for *** percent.

Supply constraints

Most responding U.S. producers (***) and importers (68 of 83) reported they did not have any supply constraints since January 1, 2013. Importer *** stated that it has declined many orders and has extended some lead times due to limited allocation and that it has a *** minimum order quantity for certain specifications such as ***. Importer *** noted a supply and delivery problem at "the mill." Importer *** stated that, due to lead times, the material such as the mould for bumpers or dash boards is not always available from stock and the mud pump

[10] For data on the number of responding foreign firms and their share of U.S. imports from each of the subject countries, please refer to Part I, "Summary Data and Data Sources."

business is all made to order. It also stated that ***. Importers *** stated that they and their customers must be able to secure an additional source of offshore grade Thermo-Mechanical Control Process (TMCP) plate to meet U.S. energy customers' needs for offshore fabrication projects and that they imported TMCP plate on a project-specific basis only.[11] Importer *** stated that internal capacity for special melted products (i.e. vacuum induction melting, vacuum arc remelting, electro-slag remelting, and powder metallurgically produces products) has not been sufficient to keep up with demand.

Purchasers were asked if a domestic or import supplier had refused, denied, or been unable to supply CTL plate since January 1, 2013 due to the following constraints: allocation or "controlled order entry," declined orders, supplier accepted order but delivered less that promised or contracted, suppliers being unable to provide timely order completion or had extended delivery times, or suppliers being unable or unwilling to provide specific types of CTL plate or meet necessary product specifications. Most responding purchasers responded that they had not experienced any of these supply constraints since January 2013. The categories to which purchasers most frequently responded affirmatively regarding supply constraints from domestic producers were: "unable to provide specific types of CTL plate or product specifications" (27 of 86 responding purchasers), citing various CTL plate grades including X-70 and tool steel products;[12] and "unable to provide timely order completion" (22 of 83 responding purchasers), citing lead times, quality, and delivery issues from ArcelorMittal and Nucor. Regarding supply constraints from importers, 10 of 79 purchasers reported that importers declined orders, citing the uncertainty of the ongoing antidumping and countervailing duty investigations as well as price (***, small quantity orders (***), and POSCO's inability to make lighter narrower plates ***). Similarly, 10 of 79 responding purchasers reported that importers were unable to provide certain specifications because of the ongoing antidumping and countervailing duty investigations and that some mills were unable to provide some dimensions for tool applications, or inability to meet high strength grades, and difficulties based on mill rolling programs.

U.S. demand

Based on available information, the overall demand for CTL plate is likely to experience small-to-moderate changes in response to changes in price, depending on the end-use market for the CTL plate. The main contributing factors are a wide variety of cost shares for CTL plate among end-use products and the existence of substitute products for CTL plate only in particular end uses.

[11] Importers *** stated that only Japanese mills produce offshore grade TMCP plate in all grades and thicknesses of 1" to 4".

[12] See app. D for purchasers' narrative responses to this question regarding supply constraints, along with several other questions.

End uses

U.S. demand for CTL plate depends on the demand for U.S.-produced downstream products. CTL plate is used for construction, infrastructure, heavy industrial production, line pipe, shipbuilding, barges, tanks, railcars and rail transportation, tractors, wind towers, electricity transmission poles, oil and gas structures, industrial equipment, pipe and tube, and rail transportation. According to the American Iron and Steel Institute, the construction segment is the largest market into which CTL plate is shipped directly from U.S. producers to the end user (table II-4).

Table II-4
End use distribution: Shipments by U.S. producers of CTL plate by market classification, 2013-15

* * * * * * *

Cost share

The share of the cost of CTL in end-use products can vary considerably depending on the end use. Some products for which CTL plate reportedly accounts for a major portion of the cost of downstream products include: pressure vessels (95-100 percent), processed plate (84 percent), wind towers (40-80 percent), and large diameter line pipe (70-80 percent). Other products for which CTL plate accounts for small portions of costs include: automotive (23 percent), aerospace (12 percent), cranes (10 percent), oil rigs (10 percent), power plant equipment (5 percent), and mining equipment (5 percent). Some firms reported cost shares that ranged substantially for the same end use: tooling (10-100 percent), shipbuilding (6 to 85 percent), construction and construction equipment (8 to 100 percent), bridges/bridge girders (35 to 40 percent), and railroad applications (20 to 90 percent).

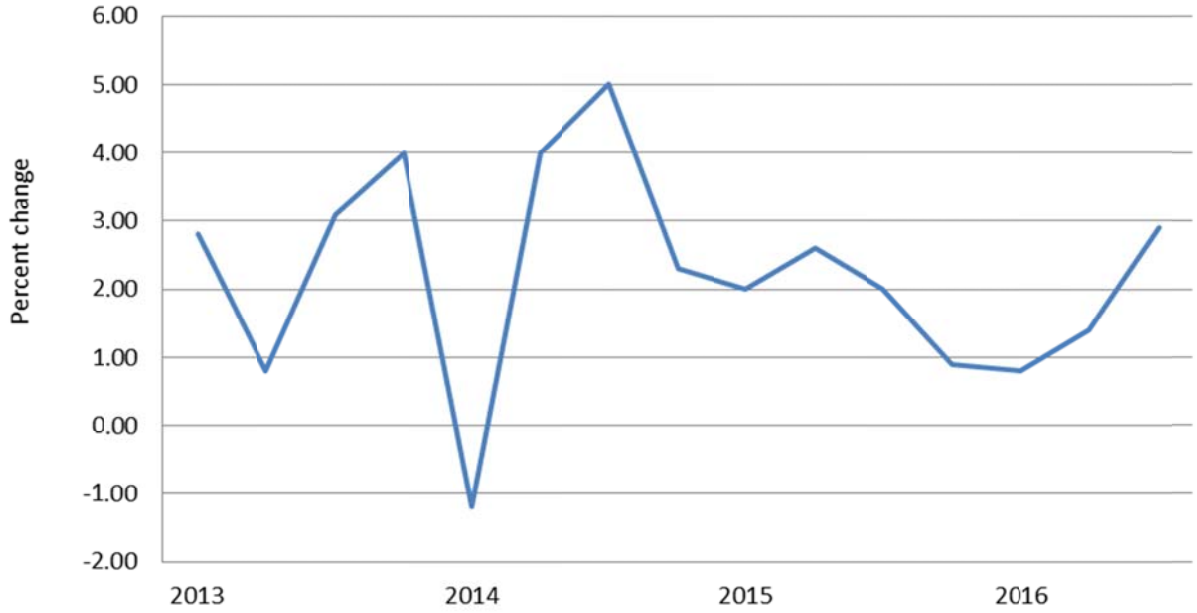
Business cycles and distinctive conditions of competition

Most responding firms (*** responding U.S. producers, 61 of 85 responding importers, and 64 of 86 responding purchasers) indicated that the market for CTL plate was not subject to business cycles. A minority of firms (4 of 18 responding producers, 14 of 85 responding importers, and 15 of 86 responding purchasers) indicated that the CTL plate market was subject to distinctive conditions of competition. Domestic producers described global oversupply of CTL plate as a distinctive condition of competition. *** stated that the alloy CTL plate market is fairly consistent. Several importers and purchasers described times of the year in which demand is increased or decreased, yet not all noted the same seasonal changes. Importer *** reported that the oil industry and agricultural prices drive demand for CTL plate. Other producers, importers and purchasers noted that demand is dependent on the downstream industries which use CTL plate.

Whereas certain industries may have a greater or different effect on the demand for CTL plate, some producers and importers noted that overall demand fluctuates with the economy in general since CTL plate is used in a wide variety of sectors. While GDP has increased in nearly

all quarters of January 2013-September 2016, except the first quarter of 2014, it has increased by varying amounts – from less than 1 percent to nearly 5 percent (figure II-1).

Figure II-1
Real GDP growth, percentage change from previous periods, by quarters, January 2013-September 2016



Note.--Third quarter 2016 is an advance estimate.

Source: National Income and Product Accounts - Table 1.1.1, Percent Change from Preceding Period in Real Gross Domestic Product, Bureau of Economic Analysis, http://www.bea.gov/national/, retrieved November 7, 2016.

Demand trends

Responses from U.S. producers, importers, and purchasers were mixed regarding how demand within the United States changed between January 2013 and December 2014,[13] but a majority of each type of market participant reported that demand has declined since January 2015. U.S. producers, importers, and purchasers reported that demand for CTL plate in multiple sectors and outside the United States had behaved similarly to overall market demand (table II-5). A majority of firms reported that demand for CTL plate in the automotive sector had increased between January 2013 and December 2014, as did a plurality of firms regarding the construction and rail transportation industries. A plurality of firms reported no change in demand for CTL plate in the agricultural and electrical equipment, shipbuilding and marine equipment, wind tower, and "other" sectors, while a plurality reported a decrease in demand for the machinery, tools, and industrial equipment, as well as the oil and gas industry between

[13] A plurality of these firms reported that demand inside the United States had increased.

January 2013 and December 2014. Since January 2015, however, a majority of firms reported decreases in demand in every sector, except the automotive and wind tower sectors, for which a plurality of firms reported that demand for CTL plate was unchanged, but more reporting increased demand than decreased demand.[14]

Table II-5
CTL plate: Firms' responses regarding U.S. demand and demand outside the United States

Item	January 1, 2013-December 31, 2014			Since January 1, 2015		
	Increase	No change	Decrease	Increase	No change	Decrease
Overall demand inside the United States:						
U.S. producers	7	5	5	3	2	12
Importers	24	15	26	6	12	46
Purchasers	21	23	17	8	12	43
Subtotal	52	43	48	17	26	101
Agricultural and electrical equipment:						
U.S. producers	1	5	5	0	1	9
Importers	8	7	5	0	6	13
Purchasers	7	11	11	2	9	20
Subtotal	16	23	21	2	16	42
Automotive:						
U.S. producers	4	2	0	4	2	1
Importers	15	5	3	8	11	4
Purchasers	11	7	1	6	8	4
Subtotal	30	14	4	18	21	9
Construction:						
U.S. producers	4	4	4	3	4	6
Importers	16	8	12	5	11	19
Purchasers	15	12	8	6	9	20
Subtotal	35	24	24	14	24	45
Machinery, tools & industrial equipment:						
U.S. producers	3	5	5	0	3	9
Importers	14	8	11	3	7	24
Purchasers	11	11	13	4	10	23
Subtotal	28	24	29	7	20	56
Oil and gas industry:						
U.S. producers	7	1	7	0	1	14
Importers	18	4	24	2	6	38
Purchasers	13	11	17	1	5	38
Subtotal	38	16	48	3	12	90

Table continued on next page.

[14] An equal amount of firms reported unchanged and decreasing demand for CTL plate in "other" sectors.

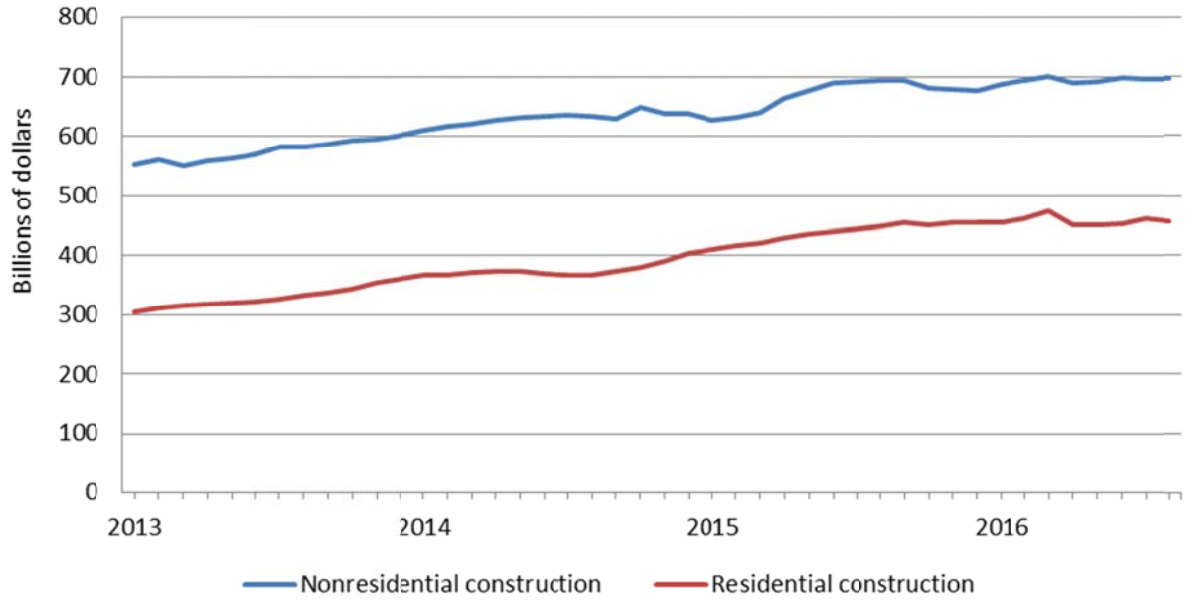
Table II-5—Continued
CTL plate: Firms' responses regarding U.S. demand and demand outside the United States

Item	January 1, 2013-December 31, 2014			Since January 1, 2015		
	Increase	No change	Decrease	Increase	No change	Decrease
Rail transportation:						
U.S. producers	7	2	4	1	3	9
Importers	13	6	3	1	4	18
Purchasers	11	8	8	1	6	22
Subtotal	31	16	15	3	13	49
Shipbuilding and marine equipment:						
U.S. producers	5	5	2	2	3	7
Importers	9	7	8	1	7	16
Purchasers	7	10	10	0	9	17
Subtotal	21	22	20	3	19	40
Wind towers:						
U.S. producers	6	3	2	5	5	1
Importers	6	8	3	6	8	4
Purchasers	3	10	3	6	9	4
Subtotal	15	21	8	17	22	9
Other:						
U.S. producers	0	1	2	0	0	2
Importers	2	4	1	1	3	3
Purchasers	3	5	2	0	6	5
Subtotal	5	10	5	1	9	10
Demand outside the United States:						
U.S. producers	2	2	1	0	1	4
Importers	7	11	16	0	10	23
Purchasers	2	7	5	0	6	8
Subtotal	11	20	22	0	17	35

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

Most responding purchasers (51) stated that demand for end-use products had decreased or fluctuated since 2013 while 15 stated that demand for end-products increased. Fifty-eight purchasers stated that the change in end-use demand changed their firm's demand for CTL plate; most of these purchasers stated that there is a direct connection between demand for end-use products and the demand for CTL plate. As discussed above, two common applications for CTL plate are construction and energy development and transmission. The value of seasonally adjusted residential and non-residential U.S. construction spending, on a monthly basis, increased during January 2013-September 2016 (figure II-2). The total value of annualized U.S. construction spending increased from $857 billion in January 2013 to $1,150 billion in September 2016.

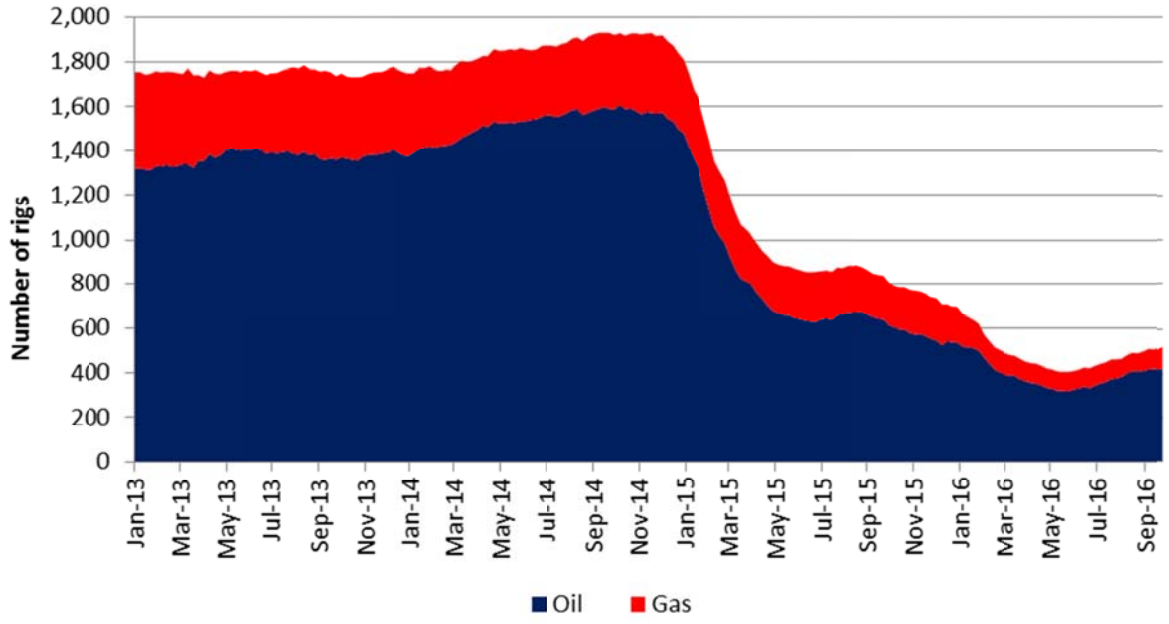
Figure II-2
Values of U.S. construction spending: Residential and nonresidential construction, seasonally adjusted at annual rates, by months, January 2013-September 2016



Source: Federal Reserve Economic Data, https://fred.stlouisfed.org; retrieved November 7, 2016.

As can be seen in figure II-3, the oil rig count declined precipitously during 2015 but has steadily increased since May 2016. In September 2016, the rig count declined by 70.3 percent since January 2013 and 73 percent since the peak in September 2014.

Figure II-3
Baker-Hughes United States oil and gas rig count, weekly, January 2013-September 2016



Source: Baker Hughes North America Rotary Rig Count, November 1, 2016.

The growth of natural gas pipelines is also an indicator of demand for CTL plate. The Federal Energy Regulatory Commission has issued an increasing number of orders approving pipeline projects since 2013, including 17 projects involving 290 miles of pipeline in 2013, 26 projects involving 422 miles of pipeline in 2014, 35 projects involving 475 miles of pipeline in 2015, and 38 projects involving 1,111 miles of pipeline through October 12, 2016.[15]

In the past five years, production growth of the Utica and Marcellus shale have resulted in the addition of 51 billion cubic feet per day (Bcfd) of new pipeline capacity, and approximately 49 Bcfd of capacity is proposed or planned to come online by 2018.[16] There are currently several large pipeline projects requiring X-70 plate under way. For example, pipe producer Berg has listed on its website five pipeline project orders (AIM, Hillabee Expansion, Rover, Sabal Trail, and Southeast Connector) to be produced in 2015/2016 involving X-70 plate. These projects involve over 500,000 tons of plate and more than 700 miles of pipeline when complete.[17]

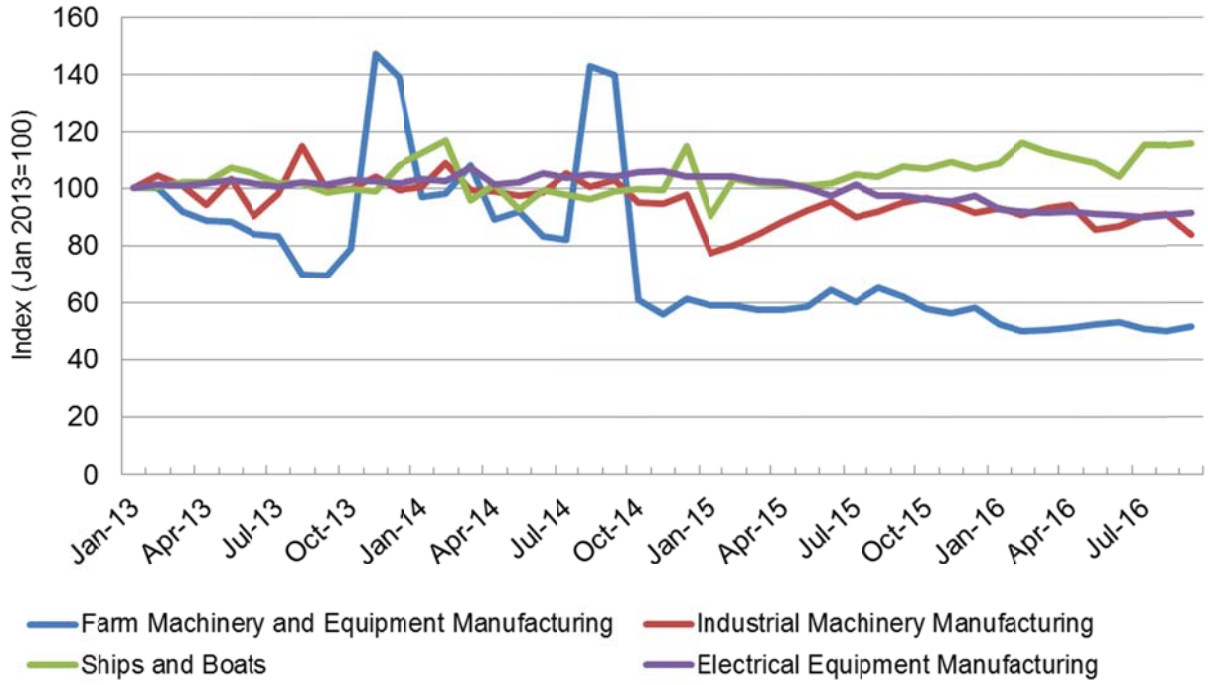
Shipments of machinery and industrial equipment, agricultural equipment, electrical equipment, and ships and boats fluctuated from January 2013 to mid-2015, with shipments of ships and boats increasing while industrial, electrical, and agricultural equipment shipments declined (figure II-4). Since January 2013, shipments of ships and boats increased by 16 percent while electrical equipment manufacturing fell by 8 percent and industrial machinery manufacturing fell by 16 percent. Agricultural equipment shipments were highly volatile in 2013 and 2014, characterized by two large increases and two large decreases between the second half of 2013 and second half of 2014. In October 2014, agricultural equipment shipments dropped by more than 50 percent to roughly 60 percent of the level of shipments in January 2013. From October 2014 to September 2016, shipments of agricultural equipment dropped a further 10 percent.

[15] Approved projects may include pipeline expansions, repairs, refurbishment, abandonment, leasing of capacity, new equipment, or other changes. Source: Approved Major Pipeline Projects, 2009-present, Federal Energy Regulatory Commission, http://www.ferc.gov/industries/gas/indus-act/pipelines/approved-projects.asp, updated October 12, 2016, retrieved November 7, 2016.

[16] FERC State of the Markets Report 2015, Item No. A-3, March 17, 2016, p. 2.

[17] Berg Pipe project list, http://www.bergpipe.com/130-0-project-list.html, retrieved November 9, 2016.

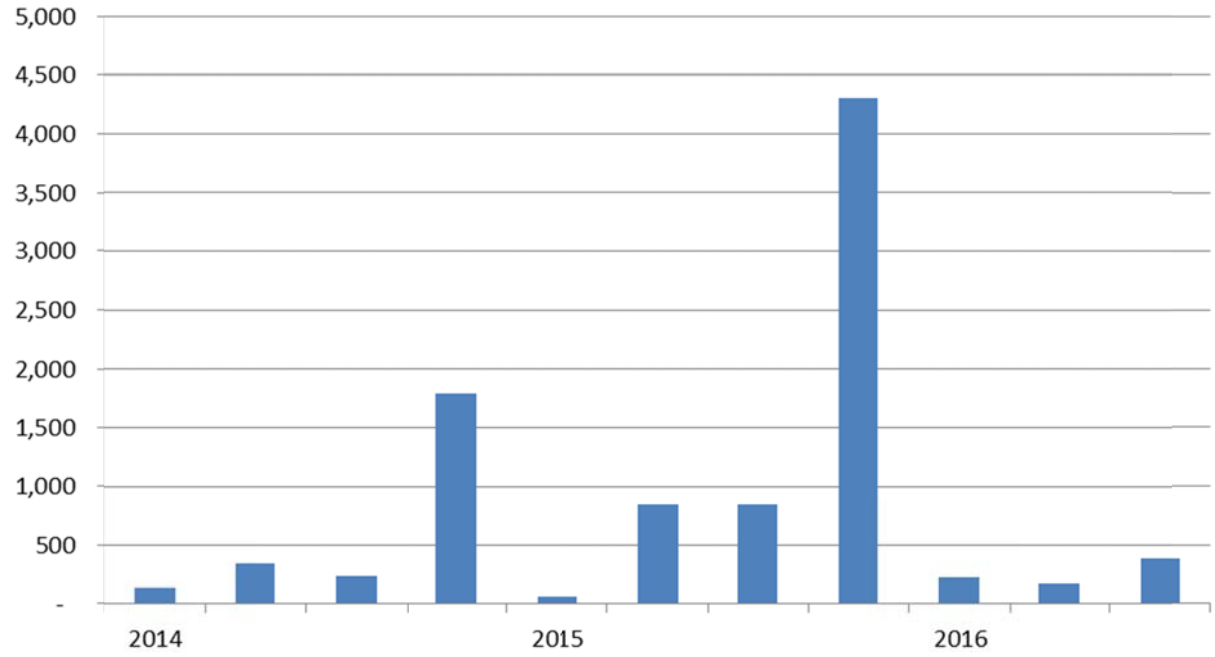
Figure II-4
Manufacturers' shipments: Index of seasonally adjusted value of shipments of farm machinery and equipment; industrial machinery; ships and boats; electrical equipment manufacturing, by month, January 2013-September 2016



Source: U.S. Census Bureau, Manufacturers' Shipments, Inventories, and Orders, November 3, 2016.

According to the American Wind Energy Association (AWEA), the number of utility scale wind turbines/wind towers increased from 2014 to the third quarter of 2016. Over 9,000 wind turbines were constructed in the United States since January 2014 (figure II-5).

Figure II-5
Wind towers: number of utility scale wind turbines January 2014-September 2016



Source: American Wind Energy Association, U.S. Wind Energy Industry Market Reports, 2014-2016, http://www.awea.org/gencontentv2.aspx?ItemNumber=875&mainnav=8193&navItemNumber=8223, accessed November 3, 2016.

According to one industry publication, the rail economy is in its second year of a substantial cyclical downturn. Although orders for new railcars have decreased precipitously, railcar manufacturers continue to decrease the order backlog that had built up in the prior two years. The decrease from energy-related railcars has not been offset by increased orders in other segments like those used to haul plastics or grain. Although the market may not have reached a bottom, it notes that "it is difficult to imagine that there is much more downside in that market."[18]

Substitute products

Substitutes for CTL plate are limited. Most U.S. producers (14 of 18), responding importers (78 of 83), and responding purchasers (74 of 81) reported that there were no substitutes for CTL plate.

Even for the few reported substitutes for CTL plate, the potential for substitution is often limited by the end use, as well as such factors as width, thickness, strength, and price. Nonetheless, four producers, five importers (which include two producers), and seven purchasers reported that there were substitute products for CTL plate. Substitute products

[18] Nahass, "The Market is Stuck – For Now," *Railway Age*, October 2016. Found at https://issuu.com/railwayage/docs/ra_october_2016, retrieved November 7, 2016.

include aluminum in light equipment manufacturing, concrete in bridges and other structural supports, hot-rolled coil and flat bar products in narrow applications, machined bar and palec for tooling molds and dies, castings for die sets, and wood, pipe, and other metal products in commercial construction. Producer *** noted that "substitution is not generally a notable factor in the market price of steel plate. Other supply and demand factors predominate and changes in the price of substitutes play a minor role."

SUBSTITUTABILITY ISSUES

The degree of substitution between domestic and imported CTL plate depends upon such factors as relative prices, quality (e.g., grade standards, reliability of supply, defect rates, etc.), and conditions of sale (e.g., price discounts/rebates, lead times between order and delivery dates, payment terms, product services, etc.). Based on available data, staff believes that there is at least a moderate-to-high degree of substitutability between domestically produced CTL plate and CTL plate imported from subject sources for the majority of CTL plate volumes. The product mix of imports varied across subject sources. This affects the degree with which they can be substituted for domestic product.

Lead times

CTL plate is primarily sold on a produced-to-order basis. U.S. producers and importers reported that 84.6 percent and 89.6 percent of their commercial shipments, respectively, were produced-to-order in 2015. Producers reported that produced-to-order lead times ranged from one week to nearly three months, and that inventory lead time is typically 10 days or less. For importers, produced-to-order lead times were typically three to six months. When selling out of U.S. inventory, 17 of 23 responding importers reported lead times of seven days or fewer.

Knowledge of country sources

Seventy-five purchasers indicated they had marketing/pricing knowledge of domestic product, 22 of product from Austria, 17 of product from Belgium, 24 of product from Brazil, 20 of product from China, 14 of product from France, 41 of product from Germany, 19 of product from Italy, 30 of product from Japan, 35 of product from Korea, 15 of product from South Africa, 18 of product from Taiwan, 25 of product from Turkey, and 34 of product from nonsubject countries.

As shown in table II-6, a majority of purchasers reported that they and their customers "sometimes" or "never" make purchasing decisions based on the producer or country of origin. Of these purchasers, ten indicated that these decisions are based on whether the project requires domestic product, and five indicated that their sourcing decisions were based on customer requirements or preferences.

Table II-6
CTL plate: Purchasing decisions based on producer and country of origin

Decision	Always	Usually	Sometimes	Never
Purchases based on producer:				
Purchaser's decision	20	16	29	22
Purchaser's customer's decision	3	8	40	24
Purchases based on country of origin:				
Purchaser's decision	15	17	36	20
Purchaser's customer's decision	6	7	46	18

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

Of the 20 purchasers that reported that they "always" make decisions based on the producer, two firms cited a preference for domestically produced CTL plate, and three reported that they avoid purchasing Chinese product.[19] Other reasons cited include customers' acceptance and quality. Purchasers *** reported that only foreign producers produce the quality and type of plate *** and that they currently purchase CTL plate from Germany, Austria, and Japan.

Importers and purchasers were asked if they or an affiliate have operations in multiple countries, if they purchase CTL plate on a consolidated basis for multiple markets including the United States, and if their firm directed or is directed by any firm in its supply chain to purchase CTL plate from any source inside or outside the United States. Fifty-one of 88 responding importers and 35 of 86 responding purchasers reported that they or their affiliate have operations in multiple countries. Only 7 importers and 9 purchasers reported that they purchase CTL plate on a consolidated basis, while 6 importers direct firms in their supply chains to purchase CTL plate and 5 purchasers are directed by firms in its supply chain to purchase CTL plate from any source inside or outside the United States.

Factors affecting purchasing decisions

The most often cited top three factors firms consider in their purchasing decisions for CTL plate were price (84 firms),[20] availability (66 firms), and quality (63 firms) as shown in table II-7. Quality was the most frequently cited first-most important factor (cited by 36 firms), followed by price (26 firms); price was the most frequently reported second-most important factor (32 firms), followed by availability (27 firms); and availability (including delivery and lead times) was the most frequently reported third-most important factor (30 firms) followed by price.

[19] Purchaser *** reported also avoiding Brazilian product or product from Italian firm Officine Tecnosider.

[20] The three purchasers that did not report price in their top three factors were ***, all tool steel purchasers.

Table II-7
CTL plate: Ranking of factors used in purchasing decisions as reported by U.S. purchasers, by factor

Item	1st	2nd	3rd	Total
	Number of firms			
Quality	36	21	9	63
Price/cost	26	32	28	84
Availability/delivery/lead times	11	27	30	66
All other factors[1]	2	2	7	NA

[1] Other factors include strategic/certified supplier, customer service, value added (such as holding inventory and angle cut), meeting specifications on chemical composition size tolerances, and thickness) and stocking programs.

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

The majority of responding purchasers reported that they "usually" (48 of 85) or "sometimes" (28) purchase the lowest-priced product. Additionally, when asked if they purchased CTL plate from one source although a comparable product was available at a lower price from another source, 58 purchasers reported reasons for doing so, including quality, availability and reliability, credit terms, stocking agreements, shorter lead times, consistency, domestic requirements, supplier diversification, and good business relationships with suppliers.

Most responding purchasers (45 of 84), 35 of 79 responding importers, and 3 of 17 responding producers reported that certain types of product were only available from a single source. Primarily, purchasers and importers reported that producers in the United States could not produce tool steel,[21] TMCP grade steel for offshore construction,[22] pressure vessel plate,[23] X-70 plate,[24] and shipbuilding plate.[25] Detailed responses from purchasers, importers, and producers can be found in appendix D.

Importance of specified purchase factors

Purchasers were asked to rate the importance of 17 factors in their purchasing decisions (table II-8). The factors rated as very important by more than half of responding purchasers were price (78 purchasers), quality meets industry standards (77), product consistency (75), reliability of supply (75), availability (74), prior experience with suppliers (62), delivery time (59), quality exceeds industry standards (49), and supplier certification (48).

[21] These firms include ***.
[22] These firms include ***.
[23] These firms include ***.
[24] These firms include ***.
[25] These firms include ***.

Table II-8
CTL plate: Importance of purchase factors, as reported by U.S. purchasers, by factor

Factor	Number of firms reporting		
	Very Important	Somewhat Important	Not Important
Availability	74	13	0
Delivery terms	39	35	13
Delivery time	59	28	0
Discounts offered	30	38	18
Extension of credit	26	34	27
Minimum quantity requirements	25	46	15
Packaging	11	39	35
Price	78	9	0
Prior experience with suppliers	62	23	2
Product consistency	75	12	0
Product range	35	45	7
Quality meets industry standards	77	10	1
Quality exceeds industry standards	49	29	9
Reliability of supply	75	12	0
Supplier certification	48	31	8
Technical support/service	29	46	12
U.S. transportation costs	33	44	9

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

Supplier certification

Fifty-nine of 87 responding purchasers require their suppliers to become certified or qualified to sell CTL plate to their firm. Purchasers reported that the time to qualify a new supplier averaged 94 days.[26] Several purchasers (14 of 85) reported that a domestic or foreign supplier had failed in its attempt to qualify product, or had lost its approved status since 2013. Purchasers reported that U.S. producers including Joy Global (Nucor) (4 purchasers); ArcelorMittal (2 purchasers); and SSAB, Evraz, JSW Steel, and International Tool Steel (1 purchaser each) failed certification.

Purchaser *** reported that all CTL plate from Chinese mills did not pass quality checks and could not meet internal specifications; *** reported that Usiminas (Brazil) was disqualified due to late deliveries; and purchasers *** reported that Nippon (Japan) failed to certify. Purchaser *** reported that NMLK (Italy) and POSCO (Korea) failed certification due to surface quality issues and sulfur content. Purchaser *** reported that Kloeckner was unable to provide the required ***.

In addition, purchasers were asked if they require qualified suppliers to also meet specific requirements to be awarded a project and if suppliers failed to meet requirements for

[26] Fifteen purchasers reported the time it takes to qualify a new supplier is one month or less, 9 purchasers reported that it takes over 1 month to 3 months, and 14 purchasers reported over 3 months to a year to certify a new supplier.

specific projects since January 1, 2013. A majority of purchasers (50 of 85) do not require their suppliers to also meet project specific requirements; however 35 responding purchasers do, of which 21 purchasers reported that all or nearly all of their purchases had such requirements. Some of the types of requirements cited were prescribed chemistries, physical properties, ISO certification, melting mill certifications, and ASTM, ASME, ABS certifications.[27]

Nine of 83 responding purchasers reported that a supplier had failed to meet project specific requirements. *** submitted a listing of 10 projects totaling 1.2 million short tons and the reasons why the three largest domestic producers could not supply these projects.[28] *** identified SSAB and ArcelorMittal because they refused to provide quotes that would include a just in time delivery structure. *** stated that U.S. mills cannot currently meet requirements for fabricating TMCP offshore grade plate. *** stated that Joy Global failed to meet several plates load requirements. *** stated that ArcelorMittal and Nucor did not have DNV/GL class certification for its ship contract, which prohibited them from its qualified bidders list. *** stated that voestalpine and POSCO can furnish ABS EH 40. Lastly, ***. *** reported that U.S. producers ***.

Changes in purchasing patterns

Purchasers were asked about changes in their purchasing patterns from different sources since 2013 (table II-9). For most country sources, a plurality of purchasers reported fluctuating purchases. Purchasers reported constant purchases from France, and decreasing or fluctuating purchases from Austria and South Africa. Reasons reported for changes in sourcing included pricing, availability, lead times, and business cycles. Purchaser *** reported that CTL plate from Belgium was approved in 2013 and replaced purchases from the Netherlands and Sweden. Purchasers *** reported increased purchases of "***" from Japan due to increased availability, adherence to customer specifications, and better delivery times. Purchaser *** reported that due to ArcelorMittal's "poor quality and unpredictable delivery performance," it changed suppliers in favor of foreign suppliers "***." ***. ***.

[27] SSAB stated that there is an open, tripartite discussion between the plate producer, pipe producer and end user in which the plate producer may offer alternatives or exceptions during the bid process to determine how to the suppliers' production processes can meet the technical and cost needs of the customer. Hearing transcript, pp. 124-125 (Schmitt) and Petitioner SSAB's posthearing brief, responses to Commissioner questions, p. 22. Respondent POSCO stated that '"exceptions" or "alternatives"' to the end users requested specifications are "in fact instances in which the domestic supplier is unable to meet the required specifications for a project and therefore requests that requirements be waived to allow the supplier to submit a bid to supply non-conforming plate." Respondent POSCO's posthearing brief, p. 7.

[28] *** response to purchaser questionnaire, app. 2.

Table II-9
CTL plate: Changes in purchase patterns from U.S., subject, and nonsubject countries

Source of purchases	Did not purchase	Decreased	Increased	Constant	Fluctuated
United States (US)	6	25	9	23	25
Austria	43	8	3	3	8
Belgium	48	3	3	4	7
Brazil	43	4	2	4	14
China	43	6	5	2	9
France	50	3	2	5	3
Germany	33	5	8	10	11
Italy	42	3	5	3	12
Japan	37	2	6	4	18
Korea, POSCO & affiliates	32	6	11	3	18
South Africa	46	5	3	3	5
Taiwan	44	5	2	2	11
Turkey	44	1	5	3	11
All other countries[1]	25	11	9	7	15
Sources unknown	31	2	3	6	9

[1] Other includes Australia, Bulgaria, Canada, Czech Republic, Finland, Macedonia, Mexico, Netherlands, New Zealand, Russia, Slovenia, Sweden, Thailand, Ukraine, and the United Kingdom.

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

Twenty-six of 86 responding purchasers reported that they had changed suppliers since January 1, 2013. Specifically, firms dropped or reduced purchases from U.S. producers ArcelorMittal, JSW Steel, and SSAB due to quality and delivery issues. Purchaser *** reported dropping POSCO (Korea), voestalpine (Austria), Dillinger (Germany), NMLK (Italy), and Technoside (Italy) due to the present investigations. Other purchasers reported dropping International Tool Steel (sources unknown) due to quality issues, Steel Warehouse (Netherlands), because pricing was no longer competitive, and Kloeckner (Turkey and other sources) for unspecified reasons.

Purchasers reported adding new suppliers primarily to broaden product ranges, to expand their supply base, and to insure against quality, delivery, and cost issues. Purchasers added or increased purchases from U.S. producers Evraz, Nucor, Severstal, and Steel Warehouse. Purchaser *** reported that it added Nucor once it ***. Firms also increased purchases from Bestar (Austria, China, Germany, and Slovenia), Burwell/Hunan Valin (sources unknown), Dillinger (Germany), Dongkuk (sources unknown), Essar (sources unknown), Ferralloy (sources unknown), JFE Steel (Japan), Hyundai/Okaya (Korea), Kopo International (Slovenia), NLMK (Italy), NSSMC (Japan), POSCO (Korea), and Salzgitter Ilsenberg (Germany). Fifteen of 86 purchasers reported new suppliers, including U.S. suppliers at Big River, SSAB and Nucor because they expanded their product offerings. Other purchasers reported new suppliers BgH Edelstahl (source unknown), Burwell/Hunan Valin (source unknown), Cotia (Brazil), Elwood Special Steel (source unknown), Makstil (Macedonia), and NMLK (Italy).

Importance of purchasing domestic product

Seventy-five of 78 purchasers reported that most of their purchases were not subject to domestic requirements. Forty-one purchasers reported that domestic product was required by law: 23 purchasers reported that less than 10 percent of their purchases were required to be domestic, 17 purchasers reported that 10 to 40 percent of their purchases were required to be domestic, and one purchaser (***) reported that 100 percent of its purchases were required to be domestic in 2015. Thirty-nine purchasers reported that domestic product was required by their customers (ranging from 1 to 80 percent of their purchases), and 10 purchasers reported other preferences for domestic product. Reasons cited for preferring domestic product included: lead time constraints, that certain material composition is only available from domestic sources, and customer preference.

Comparisons of domestic products, subject imports, and nonsubject imports

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

Most purchasers reported that CTL plate from the United States and most subject sources were comparable on all factors except availability, delivery terms, delivery time, and price (table II-11). Most purchasers reported that the U.S. product has superior delivery time compared with all subject sources, but inferior (i.e., higher) prices compared with product from all subject sources except Germany and Turkey. In addition, purchasers indicated that the U.S. product has superior availability when compared with CTL plate from China, France, Italy, Japan, Korea, and Taiwan, and superior delivery terms when compared with CTL plate from Belgium, Brazil, Italy, Japan, South Africa, and Turkey. U.S. product is superior in delivery terms to CTL plate from Belgium, Brazil, Italy, Japan, South Africa, and Turkey; and is superior in delivery time to CTL plate from all subject countries with the exception of France. In regards to prior experience with suppliers, most purchasers reported that U.S. product and subject product were comparable, although an equal amount of purchasers reported the U.S. product as superior as noted that they are comparable.

Most purchasers reported that CTL plate from nonsubject countries was comparable to U.S.-produced CTL plate on all factors. Most purchasers reported that CTL plate from the 12 subject countries is comparable on all factors with the CTL plate supplied by nonsubject sources.

Table II-10
CTL plate: Purchasers' comparisons between U.S.-produced and imported product

Factor	Number of firms reporting								
	United States vs. Austria			United States vs. Belgium			United States vs. Brazil		
	S	C	I	S	C	I	S	C	I
Availability	5	8	6	3	8	2	9	11	2
Delivery terms	6	10	3	6	5	1	10	9	2
Delivery time	11	4	4	8	3	2	11	7	3
Discounts offered	4	10	4	2	9	1	4	14	2
Extension of credit	3	13	3	1	9	2	4	15	0
Minimum quantity requirements	3	11	5	1	10	0	6	14	0
Packaging	1	13	4	1	9	1	2	17	0
Price[1]	3	7	9	1	6	6	3	8	10
Prior experience with suppliers	4	8	8	4	7	1	8	10	1
Product consistency	3	9	7	2	9	1	3	16	1
Product range	4	7	9	4	7	1	6	11	2
Quality meets industry standards	3	11	7	2	11	0	3	17	1
Quality exceeds industry standards	4	9	8	4	8	1	5	15	1
Reliability of supply	5	7	7	4	6	2	7	13	0
Supplier certification	1	15	4	0	11	1	1	19	0
Technical support/service	6	8	6	5	7	0	8	9	2
U.S. transportation costs[1]	6	9	3	3	8	0	6	13	0

Factor	Number of firms reporting								
	United States vs. China			United States vs. France			United States vs. Germany		
	S	C	I	S	C	I	S	C	I
Availability	10	7	2	5	3	1	11	19	6
Delivery terms	8	9	0	4	5	0	11	20	3
Delivery time	14	2	2	4	4	1	17	12	6
Discounts offered	1	15	0	0	9	0	4	24	4
Extension of credit	2	14	0	0	9	0	2	30	2
Minimum quantity requirements	5	11	1	0	9	0	6	22	6
Packaging	2	15	0	0	7	1	2	25	5
Price[1]	0	6	11	1	4	4	5	17	12
Prior experience with suppliers	7	9	1	2	5	2	7	20	8
Product consistency	5	11	1	2	5	2	6	15	13
Product range	5	9	3	3	4	2	7	14	13
Quality meets industry standards	4	14	1	1	8	1	4	24	8
Quality exceeds industry standards	7	10	2	3	4	2	7	11	17
Reliability of supply	9	7	2	2	6	1	8	17	9
Supplier certification	2	16	0	0	9	0	3	26	7
Technical support/service	7	10	0	2	5	2	8	17	10
U.S. transportation costs[1]	5	11	1	3	5	1	9	22	3

Table continued on next page.

Table II-10—Continued
CTL plate: Purchasers' comparisons between U.S.-produced and imported product

Factor	Number of firms reporting								
	United States vs. Italy			United States vs. Japan			United States vs. Korea		
	S	C	I	S	C	I	S	C	I
Availability	9	9	1	13	12	1	15	14	6
Delivery terms	10	7	1	11	10	3	11	16	7
Delivery time	12	4	2	16	4	5	19	7	9
Discounts offered	3	14	0	4	14	6	6	18	10
Extension of credit	3	14	0	2	20	2	6	25	3
Minimum quantity requirements	5	12	0	4	17	4	7	24	3
Packaging	2	14	0	2	19	2	3	27	2
Price[1]	2	6	10	2	8	14	3	11	21
Prior experience with suppliers	8	8	0	8	14	3	8	22	3
Product consistency	4	13	0	4	14	7	3	25	6
Product range	7	10	0	4	16	6	7	21	6
Quality meets industry standards	3	15	0	2	21	4	3	30	2
Quality exceeds industry standards	6	12	0	5	13	7	4	24	6
Reliability of supply	10	7	1	6	14	4	7	20	7
Supplier certification	1	16	0	2	20	4	2	29	3
Technical support/service	10	7	0	7	13	6	11	19	4
U.S. transportation costs[1]	5	11	0	7	12	5	7	24	4

Factor	Number of firms reporting								
	United States vs. South Africa			United States vs. Taiwan			United States vs. Turkey		
	S	C	I	S	C	I	S	C	I
Availability	5	6	2	9	7	2	7	9	3
Delivery terms	6	4	2	6	9	2	9	6	2
Delivery time	7	3	2	11	4	3	10	5	3
Discounts offered	2	9	1	3	10	4	2	11	4
Extension of credit	2	10	0	2	15	0	2	14	1
Minimum quantity requirements	2	10	0	4	10	3	4	13	0
Packaging	1	10	0	2	14	1	2	14	1
Price[1]	1	3	8	2	5	11	1	9	8
Prior experience with suppliers	5	6	1	4	12	1	5	11	1
Product consistency	2	10	0	2	15	0	4	13	0
Product range	5	5	2	5	8	4	5	10	2
Quality meets industry standards	2	12	0	2	16	0	2	17	0
Quality exceeds industry standards	3	7	2	4	14	0	5	13	0
Reliability of supply	6	4	2	5	9	3	6	10	1
Supplier certification	2	11	0	1	16	0	1	17	0
Technical support/service	6	5	1	5	10	2	7	10	0
U.S. transportation costs[1]	3	9	0	2	11	3	5	13	0

Table continued on next page.

Table II-10—Continued
CTL plate: Purchasers' comparisons between U.S.-produced and imported product

Factor	Number of firms reporting								
	United States vs. Nonsubject			Austria vs. Nonsubject			Belgium vs. Nonsubject		
	S	C	I	S	C	I	S	C	I
Availability	7	16	1	2	8	0	0	6	0
Delivery terms	7	16	1	1	9	0	0	6	0
Delivery time	9	14	1	1	9	0	0	6	0
Discounts offered	2	20	2	0	10	0	0	6	0
Extension of credit	3	21	0	1	9	0	0	6	0
Minimum quantity requirements	2	20	2	1	9	0	0	6	0
Packaging	1	22	1	4	6	0	0	6	0
Price[1]	3	12	9	2	6	2	1	5	0
Prior experience with suppliers	5	17	2	4	6	0	0	6	0
Product consistency	2	19	3	5	5	0	0	6	0
Product range	7	11	5	4	6	0	1	5	0
Quality meets industry standards	2	22	1	5	6	0	0	7	0
Quality exceeds industry standards	5	17	3	5	6	0	0	7	0
Reliability of supply	6	16	2	4	6	0	0	6	0
Supplier certification	1	23	0	3	7	0	0	6	0
Technical support/service	6	16	2	3	7	0	0	6	0
U.S. transportation costs[1]	6	17	1	1	9	0	0	6	0

Factor	Number of firms reporting								
	Brazil vs. Nonsubject			China vs. Nonsubject			France vs. Nonsubject		
	S	C	I	S	C	I	S	C	I
Availability	1	7	0	0	8	1	1	3	0
Delivery terms	0	7	1	0	9	0	0	4	0
Delivery time	1	7	0	1	8	0	0	4	0
Discounts offered	0	8	0	0	9	0	0	4	0
Extension of credit	0	8	0	0	9	0	0	4	0
Minimum quantity requirements	0	7	1	0	8	1	0	4	0
Packaging	0	8	0	0	8	1	1	3	0
Price[1]	2	5	1	4	5	0	1	2	1
Prior experience with suppliers	1	6	1	0	7	2	1	3	0
Product consistency	1	7	0	0	6	3	1	3	0
Product range	2	6	0	0	6	3	1	3	0
Quality meets industry standards	1	8	0	1	5	4	1	4	0
Quality exceeds industry standards	0	9	0	0	6	4	1	4	0
Reliability of supply	1	6	1	0	6	3	1	3	0
Supplier certification	1	7	0	0	7	2	0	4	0
Technical support/service	1	5	2	0	8	1	1	3	0
U.S. transportation costs[1]	0	8	0	0	10	0	0	4	0

Table continued on next page.

Table II-10—Continued
CTL plate: Purchasers' comparisons between U.S.-produced and imported product

Factor	Number of firms reporting								
	Germany vs. Nonsubject			Italy vs. Nonsubject			Japan vs. Nonsubject		
	S	C	I	S	C	I	S	C	I
Availability	4	11	0	0	9	0	1	8	0
Delivery terms	2	12	0	0	7	1	1	6	1
Delivery time	2	12	0	0	7	1	1	6	1
Discounts offered	1	12	1	0	8	0	2	6	0
Extension of credit	1	12	1	0	8	0	2	6	0
Minimum quantity requirements	3	11	0	0	8	0	1	6	1
Packaging	3	11	0	0	8	0	1	7	0
Price[1]	2	10	2	1	6	1	3	5	0
Prior experience with suppliers	5	9	0	1	7	0	1	7	0
Product consistency	6	8	0	0	8	0	2	6	0
Product range	6	7	1	1	6	1	2	6	0
Quality meets industry standards	6	10	0	0	10	0	2	8	0
Quality exceeds industry standards	6	9	0	0	9	0	2	7	0
Reliability of supply	6	8	0	0	7	0	2	6	0
Supplier certification	4	10	0	0	8	0	2	6	0
Technical support/service	7	7	0	0	7	1	2	6	0
U.S. transportation costs[1]	2	12	0	0	8	0	1	7	0

Factor	Number of firms reporting								
	Korea vs. Nonsubject			South Africa vs. Nonsubject			Taiwan vs. Nonsubject		
	S	C	I	S	C	I	S	C	I
Availability	1	10	1	0	5	2	0	7	0
Delivery terms	1	8	2	0	5	1	0	7	0
Delivery time	0	8	3	0	4	2	0	6	1
Discounts offered	1	9	0	0	6	0	0	7	0
Extension of credit	2	8	0	0	6	0	0	7	0
Minimum quantity requirements	0	8	3	0	6	0	0	7	0
Packaging	0	11	0	0	6	0	0	7	0
Price[1]	5	5	1	2	3	1	1	6	0
Prior experience with suppliers	0	9	2	0	5	1	0	7	0
Product consistency	2	8	0	0	6	0	0	7	0
Product range	3	8	0	1	4	1	0	7	0
Quality meets industry standards	2	11	0	0	8	0	0	7	0
Quality exceeds industry standards	1	10	1	0	7	0	0	7	0
Reliability of supply	2	9	0	0	5	1	0	7	0
Supplier certification	2	9	0	0	6	0	0	7	0
Technical support/service	1	8	2	0	5	1	0	7	0
U.S. transportation costs[1]	0	10	1	0	6	0	0	7	0

Table continued on next page.

Table II-10—Continued
CTL plate: Purchasers' comparisons between U.S.-produced and imported product

Factor	Number of firms reporting		
	Turkey vs. Nonsubject		
	S	C	I
Availability	1	6	1
Delivery terms	0	6	1
Delivery time	0	6	1
Discounts offered	0	7	0
Extension of credit	0	7	0
Minimum quantity requirements	0	7	0
Packaging	0	7	0
Price[1]	3	4	0
Prior experience with suppliers	0	6	1
Product consistency	0	7	0
Product range	1	6	0
Quality meets industry standards	0	9	0
Quality exceeds industry standards	0	8	0
Reliability of supply	0	7	0
Supplier certification	0	7	0
Technical support/service	0	5	2
U.S. transportation costs[1]	0	7	0

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

Note.--S=first listed country's product is superior; C=both countries' products are comparable; I=first list country's product is inferior.

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

Table II-11
CTL plate: Summary of purchaser subject country comparisons in which a plurality or majority of purchasers report one country as superior (or inferior)

Factor	Comparison	Superior country	Number of purchasers stating		
			Superior	Comparable	Inferior
Availability	United States vs. China	United States	10	7	2
	United States vs. France	United States	5	3	1
	United States vs. Italy	United States	9	9	1
	United States vs. Japan	United States	13	12	1
	United States vs. Korea	United States	15	14	5
	United States vs. Taiwan	United States	9	7	2
Delivery terms	United States vs. Belgium	United States	6	5	1
	United States vs. Brazil	United States	10	9	2
	United States vs. Italy	United States	10	7	1
	United States vs. Japan	United States	11	10	3
	United States vs. South Africa	United States	6	4	2
	United States vs. Turkey	United States	9	6	2
Delivery time	United States vs. Austria	United States	11	4	4
	United States vs. Belgium	United States	8	3	2
	United States vs. Brazil	United States	11	7	3
	United States vs. China	United States	14	2	2
	United States vs. France	United States	4	4	1
	United States vs. Germany	United States	17	12	6
	United States vs. Italy	United States	12	4	2
	United States vs. Japan	United States	16	4	5
	United States vs. Korea	United States	19	7	9
	United States vs. South Africa	United States	7	3	2
	United States vs. Taiwan	United States	11	4	3
	United States vs. Turkey	United States	10	5	3
Price[1]	United States vs. Austria	Austria	3	7	9
	United States vs. Belgium	Belgium	1	6	6
	United States vs. Brazil	Brazil	3	8	10
	United States vs. China	China	0	6	11
	United States vs. France	France	1	4	4
	United States vs. Italy	Italy	2	6	10
	United States vs. Japan	Japan	2	8	14
	United States vs. Korea	Korea	3	11	21
	United States vs. South Africa	South Africa	1	3	8
	United States vs. Taiwan	Taiwan	2	5	11
	Korea vs. nonsubject	Korea	5	5	1

Table continued on next page.

Table II-11—Continued
CTL plate: Summary of purchaser subject country comparisons in which a plurality or majority of purchasers report one country as superior (or inferior)

Factor	Comparison	Superior Country	Number of purchasers stating		
			Superior	Comparable	Inferior
Prior experience with supplier	United States vs. Italy	United States	8	8	0
Product consistency	Austria vs. nonsubject	Austria	5	5	0
Product range	United States vs. Austria	Austria	4	7	9
	United States vs. South Africa	United States	5	5	2
Quality exceeds industry standards	United States vs. Germany	Germany	7	11	17
Reliability of supply	United States vs. China	United States	9	7	2
	United States vs. Italy	United States	10	7	1
	United States vs. South Africa	United States	6	4	2
Technical support/service	United States vs. Italy	United States	10	7	0
	United States vs. South Africa	United States	6	5	1
	Germany vs. nonsubject	Germany	7	7	0

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

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

Comparison of U.S.-produced and imported CTL plate

In order to determine whether U.S.-produced CTL plate can generally be used in the same applications as imports from the subject countries, U.S. producers, importers, and purchasers were asked whether the products can "always," "frequently," "sometimes," or "never" be used interchangeably. As shown in table II-12, all responding U.S. producers stated that domestically produced CTL plate is either "always" or "frequently" interchangeable with CTL plate from subject and nonsubject countries, with the exception of China and Brazil where one producer each reported "sometimes". Importers did not evaluate U.S. and subject product to be as frequently interchangeable as producers did. Most reporting importers noted that CTL plate from Austria, Brazil, China, France, Germany, and Japan was "sometimes" interchangeable with that from the United States. A few importers indicated that CTL plate from Austria, China, and Japan was "never" interchangeable with CTL plate produced domestically. Most responding importers reported that subject imports of CTL plate are either "always" or "frequently" interchangeable with each other, with the exceptions of Brazil, China, and Korea (POSCO), which were "sometimes" interchangeable.

Table II-12
CTL plate: Interchangeability between CTL plate produced in the United States and in other countries, by country pair

Country pair	Number of U.S. producers reporting				Number of U.S. importers reporting				Number of U.S. purchasers reporting			
	A	F	S	N	A	F	S	N	A	F	S	N
U.S. vs. subject countries:												
U.S. vs. Austria	7	4	0	0	6	6	8	2	10	8	9	0
U.S. vs. Belgium	7	2	0	0	5	10	2	0	8	9	3	3
U.S. vs. Brazil	10	4	1	0	7	7	8	0	5	14	8	6
U.S. vs. China	8	3	1	0	6	4	10	4	5	8	10	5
U.S. vs. France	8	2	0	0	4	6	8	0	5	7	7	3
U.S. vs. Germany	7	6	0	0	8	6	12	1	13	11	13	5
U.S. vs. Italy	8	3	0	0	6	11	3	0	9	10	4	5
U.S. vs. Japan	8	6	0	0	5	8	11	3	11	14	9	2
U.S. vs. Korea[1]	8	5	0	0	8	11	10	0	12	12	11	5
U.S. vs. South Africa	8	3	0	0	5	7	2	0	6	7	3	2
U.S. vs. Taiwan	8	3	0	0	6	11	4	0	9	12	5	3
U.S. vs. Turkey	10	4	0	0	6	10	2	0	9	9	4	5
Subject countries comparisons:												
Austria vs. Belgium	7	1	0	0	4	5	2	0	4	4	2	0
Austria vs. Brazil	7	2	0	0	4	4	3	0	2	5	4	0
Austria vs. China	7	2	0	0	5	4	4	1	2	3	7	2
Austria vs. France	7	1	0	0	4	4	3	0	4	3	4	0
Austria vs. Germany	7	2	0	0	5	8	4	0	4	10	4	3
Austria vs. Italy	7	2	0	0	4	4	3	0	3	4	2	0
Austria vs. Japan	7	2	0	0	4	6	2	0	4	5	2	2
Austria vs. Korea	7	2	0	0	4	4	5	0	3	5	2	1
Austria vs. South Africa	7	2	0	0	4	3	2	0	2	4	2	0
Austria vs. Taiwan	7	2	0	0	4	3	2	0	3	4	2	0
Austria vs. Turkey	7	2	0	0	4	3	2	0	2	4	2	1
Belgium vs. Brazil	7	1	0	0	4	3	4	0	3	6	1	1
Belgium vs. China	7	1	0	0	5	2	5	1	2	3	3	1
Belgium vs. France	7	1	0	0	4	4	3	0	4	4	1	0
Belgium vs. Germany	7	1	0	0	4	5	4	0	4	6	1	0
Belgium vs. Italy	7	1	0	0	5	4	4	0	5	6	1	2
Belgium vs. Japan	7	1	0	0	4	6	2	0	4	6	1	1
Belgium vs. Korea	7	1	0	0	5	4	4	0	5	4	2	1
Belgium vs. South Africa	7	1	0	0	5	3	2	0	3	5	1	1
Belgium vs. Taiwan	7	1	0	0	5	3	2	0	5	4	1	2
Belgium vs. Turkey	7	1	0	0	4	3	2	0	4	5	0	3

Table continued on next page.

Table II-12—Continued
CTL plate: Interchangeability between CTL plate produced in the United States and in other countries, by country pair

Country pair	Number of U.S. producers reporting				Number of U.S. importers reporting				Number of U.S. purchasers reporting			
	A	F	S	N	A	F	S	N	A	F	S	N
Brazil vs. China	8	2	0	0	4	2	5	0	2	5	2	2
Brazil vs. France	8	1	0	0	4	2	4	0	2	4	4	0
Brazil vs. Germany	7	3	0	0	4	4	5	0	2	9	4	2
Brazil vs. Italy	8	2	0	0	4	4	5	0	2	8	1	3
Brazil vs. Japan	8	2	0	0	4	6	3	0	2	8	1	1
Brazil vs. Korea	8	2	0	0	5	4	5	0	3	5	3	3
Brazil vs. South Africa	8	2	0	0	5	4	2	0	3	5	1	2
Brazil vs. Taiwan	8	2	0	0	6	4	2	0	3	5	1	2
Brazil vs. Turkey	8	2	0	0	5	4	2	0	3	6	0	5
China vs. France	8	1	0	0	4	2	3	1	2	3	3	2
China vs. Germany	8	2	0	0	6	4	5	1	2	5	5	4
China vs. Italy	8	2	0	0	4	3	3	2	2	5	2	2
China vs. Japan	8	2	0	0	4	4	3	2	3	5	2	1
China vs. Korea	8	2	0	0	4	2	4	2	3	4	2	2
China vs. South Africa	8	2	0	0	4	2	2	2	2	3	1	2
China vs. Taiwan	8	2	0	0	4	2	2	1	3	5	1	1
China vs. Turkey	8	2	0	0	4	2	2	1	2	5	0	2
France vs. Germany	7	2	0	0	4	5	8	0	4	7	3	0
France vs. Italy	8	1	0	0	5	2	3	0	4	5	1	0
France vs. Japan	8	1	0	0	4	5	2	0	4	6	1	0
France vs. Korea	8	1	0	0	4	3	6	0	4	4	1	0
France vs. South Africa	8	1	0	0	4	2	2	0	2	3	1	0
France vs. Taiwan	8	1	0	0	4	2	2	0	3	3	1	0
France vs. Turkey	8	1	0	0	4	2	2	0	2	3	0	1
Germany vs. Italy	7	3	0	0	5	4	4	0	3	7	2	1
Germany vs. Japan	7	3	0	0	4	6	3	0	4	8	3	2
Germany vs. Korea	7	3	0	0	5	4	6	0	4	6	3	4
Germany vs. South Africa	7	3	0	0	4	3	2	0	3	4	2	1
Germany vs. Taiwan	7	3	0	0	4	3	2	0	3	5	1	0
Germany vs. Turkey	7	3	0	0	4	3	2	0	2	5	2	3
Italy vs. Japan	8	2	0	0	4	5	3	0	3	8	1	1
Italy vs. Korea	8	2	0	0	5	3	5	0	3	6	1	2
Italy vs. South Africa	8	2	0	0	4	3	2	1	3	5	1	3
Italy vs. Taiwan	8	2	0	0	4	2	3	0	4	5	1	2
Italy vs. Turkey	8	2	0	0	4	3	3	0	3	6	0	4

Table continued on next page.

Table II-12—Continued
CTL plate: Interchangeability between CTL plate produced in the United States and in other countries, by country pair

Country pair	Number of U.S. producers reporting				Number of U.S. importers reporting				Number of U.S. purchasers reporting			
	A	F	S	N	A	F	S	N	A	F	S	N
Japan vs. Korea	8	2	0	0	4	4	5	0	6	7	2	1
Japan vs. South Africa	8	2	0	0	4	3	2	0	3	5	1	0
Japan vs. Taiwan	8	2	0	0	4	3	2	0	5	6	2	0
Japan vs. Turkey	8	2	0	0	4	3	2	0	3	6	0	2
Korea vs. South Africa	8	2	0	0	5	3	2	0	4	5	1	2
Korea vs. Taiwan	8	2	0	0	4	3	2	0	6	5	1	1
Korea vs. Turkey	8	2	0	0	4	3	2	0	4	5	0	4
South Africa vs. Taiwan	8	2	0	0	5	2	2	0	4	4	1	1
South Africa vs. Turkey	8	2	0	0	4	3	2	0	3	5	0	3
Taiwan vs. Turkey	8	2	0	0	4	4	3	0	4	5	0	3
Nonsubject country comparisons:												
United States vs. Canada	11	5	0	0	7	10	0	0	12	14	6	5
United States vs. Mexico	8	6	0	0	4	9	1	0	8	13	8	3
United States vs. Other	8	3	0	0	7	5	5	0	6	4	6	1
Austria vs. Canada	7	2	0	0	4	5	1	0	4	5	2	0
Austria vs. Mexico	7	2	0	0	4	4	1	0	3	3	3	0
Austria vs. Other	7	2	0	0	4	2	2	0	2	4	3	0
Belgium vs. Canada	7	1	0	0	4	5	2	0	6	6	1	1
Belgium vs. Mexico	7	1	0	0	4	4	1	0	5	5	2	1
Belgium vs. Other	7	1	0	0	5	2	2	0	2	4	1	1
Brazil vs. Canada	8	2	0	0	4	5	2	0	3	8	2	3
Brazil vs. Mexico	8	2	0	0	4	4	2	0	3	7	3	2
Brazil vs. Other	8	2	0	0	6	3	2	0	2	4	1	1
China vs. Canada	8	2	0	0	4	2	2	1	3	5	2	2
China vs. Mexico	8	2	0	0	4	2	2	0	2	5	1	2
China vs. Other	7	2	0	0	4	2	2	0	2	3	1	2
France vs. Canada	8	1	0	0	4	4	1	0	3	5	1	0
France vs. Mexico	8	1	0	0	4	3	1	0	3	4	1	0
France vs. Other	8	1	0	0	4	2	3	0	1	2	1	0
Germany vs. Canada	7	3	0	0	5	5	1	0	5	7	2	2
Germany vs. Mexico	7	3	0	0	4	4	1	0	3	5	3	1
Germany vs. Other	7	3	0	0	5	3	4	0	3	3	3	0
Italy vs. Canada	8	2	0	0	5	4	2	0	4	8	1	2
Italy vs. Mexico	8	2	0	0	4	3	2	0	4	7	1	2
Italy vs. Other	8	2	0	0	5	3	2	0	1	4	1	1

Table continued on next page.

Table II-12—Continued
CTL plate: Interchangeability between CTL plate produced in the United States and in other countries, by country pair

Country pair	Number of U.S. producers reporting				Number of U.S. importers reporting				Number of U.S. purchasers reporting			
	A	F	S	N	A	F	S	N	A	F	S	N
Japan vs. Canada	8	2	0	0	4	5	1	0	5	9	1	0
Japan vs. Mexico	8	2	0	0	4	4	1	0	3	8	2	0
Japan vs. Other	8	2	0	0	4	2	3	0	2	4	1	1
Korea vs. Canada	8	2	0	0	5	4	3	0	7	6	2	3
Korea vs. Mexico	8	2	0	0	4	4	1	0	4	7	1	3
Korea vs. Other	8	2	0	0	6	2	3	0	3	4	1	0
South Africa vs. Canada	8	2	0	0	4	3	2	0	4	5	1	2
South Africa vs. Mexico	8	2	0	0	4	3	2	0	4	5	1	2
South Africa vs. Other	8	2	0	0	5	2	2	0	2	4	1	0
Taiwan vs. Canada	8	2	0	0	4	2	2	0	7	6	1	1
Taiwan vs. Mexico	8	2	0	0	4	2	2	0	6	7	1	1
Taiwan vs. Other	8	2	0	0	4	3	2	0	2	3	1	1
Turkey vs. Canada	8	2	0	0	5	4	2	2	4	6	1	5
Turkey vs. Mexico	8	2	0	0	4	4	1	2	4	5	1	3
Turkey vs. Other	8	2	0	0	6	3	2	0	2	4	0	2
Canada vs. Mexico	8	2	0	0	4	3	2	0	5	8	3	1
Canada vs. Other	8	2	0	0	6	2	2	0	3	4	1	0
Mexico vs. Other	8	2	0	0	4	2	2	0	2	5	1	0

[1] Comparisons with Korea reflect comparisons of subject product from POSCO in Korea.

Note.--A=Always, F=Frequently, S=Sometimes, N=Never.

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

Purchasers were mixed in their assessment of interchangeability between domestically produced CTL plate and imports of subject product. A majority of responding purchasers reported that domestically produced was “always” or “frequently” interchangeable across all subject countries except China. Most responding importers and purchasers reported that subject imports of CTL plate were either “always” or “frequently” interchangeable with nonsubject imports of CTL plate.

Respondents assert that there are types of CTL plate, such as certain sizes or thicknesses of X-70 grade and tool steel, are not available from U.S. sources.[29] Petitioners stated that there are few types of CTL plate that they cannot or do not make, but that these are a very small

[29] See for example hearing transcript, p. 27 (Planert), pp. 170-172 (Barber), p. 173 (Kim), p. 196 (Vaughn), p. 213 (Barber).

portion of the market.[30] Further, petitioners noted that SSAB has spent a great deal of effort accessing the X-70 market and that ArcelorMittal and Nucor have also done so.[31]

Importers and purchasers identified various reasons that limit the interchangeability of CTL plate between the United States and subject countries, including availability, quality, chemistry, end-user quality perceptions of the country of origin, and ability to produce to specifications. Importer *** stated that plate dimensions are the most common issue followed by maximum weights as some mills are unable to make very heavy plate over 3" - 4".

Importer and purchaser *** stated that CTL plate should be considered interchangeable for steel mills that can produce steel suitable for API grades, meet all of its specifications and the specifications of its line pipe customer(s), and requirements set forth by the Pipeline and Hazardous Materials Safety Administration (PHMSA), but that some mills are limited as to their production capability guarantees in aspects such as width, gauge, grade and chemistry/physical properties. It continued to note that the specifications for API grade steel, particularly grade X-70, are quite rigorous and designed to ensure that only the highest quality steels are used in the manufacture of oil and natural gas line pipes and that worldwide, ***. It stated that although U.S. manufacturers can deliver the quality standard requirements of API 5L grade X-70 grade, it is often the case that they have difficulty complying with its customers' project specific requirements applicable in conjunction with the standard API 5L X-70 requirements.

Importer *** stated that "owned mill steel is produced with fine as-rolled tolerances, non-standard chemistries and special melting techniques not available from U.S. mills." Purchaser *** stated that CTL plate from Germany and Korea are used in certain specifications and applications where as it is not always the reverse with domestically produced CTL plate. It also stated that CTL plate from Korea is part of a total package offered to it, including other services.

Purchaser *** stated that all of its purchases are interchangeable because the material is produced to worldwide industry standards such as AISI and ASME. It stated that the customer only wants to know that it received the grade that it ordered, though occasionally customers specify that the material has to be domestic. *** stated that grades are not interchangeable because the attributes and functionality of each grade is different and reacts differently to heat treating, grinding, machinability, and wear and tear.

Importers *** stated that, with the limited exception of SSAB's production of 2W 50 grade plate in 1.5 inches or less, the U.S. cannot meet the sophisticated technical specifications and end user approval requirements for offshore critical applications, and thus, CTL plate from U.S. mills on the one hand, and Japan on the other, is never interchangeable for offshore critical applications.

Purchaser *** stated that Belgium and Sweden produce a much more user-friendly quenched and tempered product than the USA, Mexico produces some products that may equal USA production, but is typically a lesser quality, and the Netherlands produces a much

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[30] Hearing transcript, p. 44 (Hritz), p. 57 (Insetta).

[31] Conference transcript, p. 93 (Schagrin), and SSAB's postconference brief, pp. 14-15 and exh. 5.; hearing transcript, p. 42 (Mull).

higher-quality high strength coil product by using an iron ore base rather than a scrap base. It also stated that very few mills in China produce a consistent quality product.

As can be seen from table II-13, most responding purchasers reported that domestically produced product "always" or "usually" met minimum quality specifications. Most responding purchasers reported that the CTL plate from Austria, Belgium, Germany, Japan, Korea (POSCO), Korea (other firms), Taiwan, and Turkey "always" met minimum quality specifications and China, Brazil, France, Italy, South Africa, and that nonsubject countries "always" or "usually" met minimum quality specifications.

Table II-13
CTL plate: Ability to meet minimum quality specifications, by source[1]

Source	Always	Usually	Sometimes	Rarely or never
United States	35	37	9	2
Austria	17	9	2	0
Belgium	11	9	1	0
Brazil	12	11	2	1
China	3	14	5	2
France	10	8	2	1
Germany	31	10	1	0
Italy	9	11	4	3
Japan	23	8	1	0
Korea (POSCO)	23	14	1	2
Korea (other)	15	10	0	2
South Africa	6	9	3	0
Taiwan	12	7	0	0
Turkey	13	10	0	1
Other[2]	11	15	0	0

[1] Purchasers were asked how often domestically produced or imported CTL plate meets minimum quality specifications for their own or their customers' uses.
[2] Other includes: Canada, Finland, Korea, Macedonia, Mexico, New Zealand, Russia, and Sweden.

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

In addition, producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of CTL plate from the United States, subject, or nonsubject countries. As seen in table II-14, nearly all U.S. producers indicated that there are either "sometimes" or "never" factors other than price that distinguish CTL plate from domestic, subject and nonsubject sources. Most responding importers reported that there are either "sometimes" or "never" factors other than price when comparing domestic and subject CTL plate (with the exception of China and Germany), between CTL plate from subject countries, and subject and nonsubject CTL plate. Most responding purchasers also reported that there are "sometimes" or "never" factors other than price that are important when comparing domestic, subject, and nonsubject CTL plate.

Table II-14
CTL plate: Significance of differences other than price between CTL plate produced in the United States and in other countries, by country pair

Country pair	Number of U.S. producers reporting				Number of U.S. importers reporting				Number of U.S. purchasers reporting			
	A	F	S	N	A	F	S	N	A	F	S	N
U.S. vs. subject countries:												
U.S. vs. Austria	0	0	4	7	5	3	8	4	9	2	6	9
U.S. vs. Belgium	0	0	3	6	5	1	6	4	2	1	5	10
U.S. vs. Brazil	1	0	5	9	2	3	10	5	0	3	14	12
U.S. vs. China	1	0	5	7	8	3	7	3	6	5	5	10
U.S. vs. France	0	0	4	6	2	5	5	3	2	3	3	9
U.S. vs. Germany	0	1	5	7	3	9	8	3	10	10	9	11
U.S. vs. Italy	0	0	4	7	4	2	8	3	2	1	8	10
U.S. vs. Japan	0	1	6	7	6	4	10	2	8	4	11	9
U.S. vs. Korea[1]	1	0	5	7	5	3	12	6	4	4	16	11
U.S. vs. South Africa	0	0	4	7	1	1	6	5	1	1	7	8
U.S. vs. Taiwan	0	0	5	7	2	3	11	4	0	2	10	10
U.S. vs. Turkey	1	0	4	9	2	2	8	5	0	4	10	9
Subject countries comparisons:												
Austria vs. Belgium	0	0	1	7	1	1	4	2	0	1	1	7
Austria vs. Brazil	0	0	1	8	1	1	5	2	0	1	3	6
Austria vs. China	0	0	1	8	3	2	3	2	1	2	4	6
Austria vs. France	0	0	1	7	0	1	5	2	0	1	2	8
Austria vs. Germany	0	0	1	8	2	3	5	2	0	2	5	12
Austria vs. Italy	0	0	1	8	1	1	4	2	0	1	1	8
Austria vs. Japan	0	0	1	8	1	2	4	2	0	1	3	8
Austria vs. Korea	0	0	1	8	2	1	4	2	0	1	1	7
Austria vs. South Africa	0	0	1	8	1	1	4	2	0	1	1	5
Austria vs. Taiwan	0	0	1	8	1	1	4	2	0	1	2	5
Austria vs. Turkey	0	0	1	8	1	1	4	2	0	2	1	5
Belgium vs. Brazil	0	0	1	7	2	1	4	2	0	1	3	6
Belgium vs. China	0	0	1	7	2	1	4	2	0	2	3	5
Belgium vs. France	0	0	1	7	1	1	4	2	0	1	1	6
Belgium vs. Germany	0	0	1	7	1	3	4	2	0	1	1	7
Belgium vs. Italy	0	0	1	7	2	1	4	2	0	1	2	7
Belgium vs. Japan	0	0	1	7	2	2	4	2	0	1	2	7
Belgium vs. Korea	0	0	1	7	2	1	4	3	0	1	1	7
Belgium vs. South Africa	0	0	1	7	1	1	4	3	0	1	2	6
Belgium vs. Taiwan	0	0	1	7	1	1	4	3	0	1	2	7
Belgium vs. Turkey	0	0	1	7	2	1	4	2	0	2	2	7

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Table II-14—Continued
CTL plate: Significance of differences other than price between CTL plate produced in the United States and in other countries, by country pair

Country pair	Number of U.S. producers reporting				Number of U.S. importers reporting				Number of U.S. purchasers reporting			
	A	F	S	N	A	F	S	N	A	F	S	N
Brazil vs. China	0	0	2	8	1	1	4	2	0	2	2	6
Brazil vs. France	0	0	2	7	0	1	5	2	0	1	3	5
Brazil vs. Germany	0	0	2	8	0	3	5	2	0	2	5	7
Brazil vs. Italy	0	0	2	8	1	2	4	2	0	1	4	7
Brazil vs. Japan	0	0	2	8	1	2	4	2	0	1	3	6
Brazil vs. Korea	0	0	2	8	2	1	4	3	0	1	3	7
Brazil vs. South Africa	0	0	2	8	1	1	4	3	0	1	2	8
Brazil vs. Taiwan	0	0	2	8	1	2	4	3	0	1	3	6
Brazil vs. Turkey	0	0	2	8	1	2	4	2	0	2	3	8
China vs. France	0	0	2	7	0	2	4	3	0	2	4	6
China vs. Germany	0	0	2	8	2	3	4	2	1	3	4	8
China vs. Italy	0	0	2	8	1	1	4	2	0	2	3	7
China vs. Japan	0	0	2	8	1	2	5	2	0	2	1	6
China vs. Korea	0	0	2	8	2	1	4	2	0	2	3	5
China vs. South Africa	0	0	2	8	1	1	4	2	0	2	2	5
China vs. Taiwan	0	0	2	8	1	1	4	2	0	2	2	7
China vs. Turkey	0	0	2	8	1	1	4	2	0	2	2	7
France vs. Germany	0	0	2	7	0	6	3	3	0	2	2	8
France vs. Italy	0	0	2	7	1	1	4	2	0	1	1	7
France vs. Japan	0	0	2	7	1	2	4	2	0	2	1	7
France vs. Korea	0	0	2	7	2	2	4	2	0	2	1	5
France vs. South Africa	0	0	2	7	1	1	4	2	0	1	1	5
France vs. Taiwan	0	0	2	7	1	1	4	2	0	1	1	6
France vs. Turkey	0	0	2	7	1	1	4	2	0	2	1	5
Germany vs. Italy	0	0	2	8	1	2	5	2	0	1	2	9
Germany vs. Japan	0	0	2	8	1	3	4	2	1	2	2	10
Germany vs. Korea	0	0	2	8	2	3	5	2	1	2	2	9
Germany vs. South Africa	0	0	2	8	1	2	4	2	0	1	2	6
Germany vs. Taiwan	0	0	2	8	1	2	4	2	0	1	2	6
Germany vs. Turkey	0	0	2	8	1	2	4	2	0	3	2	7
Italy vs. Japan	0	0	2	8	1	2	4	2	0	1	3	7
Italy vs. Korea	0	0	2	8	2	1	5	2	0	1	2	6
Italy vs. South Africa	0	0	2	8	1	1	4	2	0	1	3	6
Italy vs. Taiwan	0	0	2	8	1	2	4	2	0	1	3	6
Italy vs. Turkey	0	0	2	8	1	2	4	2	0	2	3	6

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Table II-14—Continued
CTL plate: Significance of differences other than price between CTL plate produced in the United States and in other countries, by country pair

Country pair	Number of U.S. producers reporting				Number of U.S. importers reporting				Number of U.S. purchasers reporting			
	A	F	S	N	A	F	S	N	A	F	S	N
Japan vs. Korea	0	0	2	8	2	1	5	2	0	2	2	7
Japan vs. South Africa	0	0	2	8	1	1	4	2	0	1	2	6
Japan vs. Taiwan	0	0	2	8	1	1	4	2	0	1	2	7
Japan vs. Turkey	0	0	2	8	1	1	4	2	0	2	2	6
Korea vs. South Africa	0	0	2	8	1	1	4	3	0	1	2	8
Korea vs. Taiwan	0	0	2	8	1	1	4	3	0	1	2	8
Korea vs. Turkey	0	0	2	8	1	1	4	3	0	2	2	8
South Africa vs. Taiwan	0	0	2	8	1	1	4	3	0	1	2	8
South Africa vs. Turkey	0	0	2	8	1	1	4	2	0	2	2	7
Taiwan vs. Turkey	0	0	2	8	1	2	5	2	0	2	1	9
Nonsubject country comparisons:												
United States vs. Canada	1	1	5	9	2	1	9	5	1	2	12	13
United States vs. Mexico	1	1	5	7	1	1	5	3	0	3	13	9
United States vs. Other	0	0	4	7	1	3	8	4	0	6	5	8
Austria vs. Canada	0	0	1	8	1	1	4	2	0	1	1	7
Austria vs. Mexico	0	0	1	8	1	1	4	2	0	1	3	5
Austria vs. Other	0	0	1	8	1	1	4	2	1	1	3	5
Belgium vs. Canada	0	0	1	7	1	1	4	2	0	1	1	8
Belgium vs. Mexico	0	0	1	7	2	1	4	2	0	1	4	6
Belgium vs. Other	0	0	1	7	2	1	4	3	0	1	2	6
Brazil vs. Canada	0	0	2	8	1	1	4	2	0	1	2	9
Brazil vs. Mexico	0	0	2	8	1	1	4	2	0	1	5	7
Brazil vs. Other	0	0	2	8	1	2	4	3	0	1	2	7
China vs. Canada	0	0	2	8	1	1	4	2	0	2	3	7
China vs. Mexico	0	0	2	8	1	1	4	2	0	2	3	6
China vs. Other	0	0	2	8	1	1	4	2	1	3	0	7
France vs. Canada	0	0	2	7	1	1	4	2	0	1	1	7
France vs. Mexico	0	0	2	7	1	2	3	3	0	1	3	5
France vs. Other	0	0	2	7	1	1	4	2	0	1	1	6
Germany vs. Canada	0	0	2	8	1	2	5	2	1	2	2	9
Germany vs. Mexico	0	0	2	8	1	2	4	2	0	1	4	6
Germany vs. Other	0	0	2	8	1	2	5	2	1	1	2	8
Italy vs. Canada	0	0	2	8	1	1	5	2	0	1	2	8
Italy vs. Mexico	0	0	2	8	1	1	4	2	0	1	5	6
Italy vs. Other	0	0	2	8	1	2	5	2	0	1	2	6

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Table II-14—Continued
CTL plate: Significance of differences other than price between CTL plate produced in the United States and in other countries, by country pair

Country pair	Number of U.S. producers reporting				Number of U.S. importers reporting				Number of U.S. purchasers reporting			
	A	F	S	N	A	F	S	N	A	F	S	N
Japan vs. Canada	0	0	2	8	1	1	4	2	1	1	1	8
Japan vs. Mexico	0	0	2	8	1	1	4	2	0	1	4	6
Japan vs. Other	0	0	2	8	1	1	4	2	1	1	2	6
Korea vs. Canada	0	0	2	8	1	1	6	3	0	2	2	12
Korea vs. Mexico	0	0	2	8	1	1	4	2	0	1	4	9
Korea vs. Other	0	0	2	8	1	1	5	2	0	1	1	8
South Africa vs. Canada	0	0	2	8	1	1	4	2	0	1	2	8
South Africa vs. Mexico	0	0	2	8	1	1	4	2	0	1	4	7
South Africa vs. Other	0	0	2	8	1	1	4	3	0	1	2	7
Taiwan vs. Canada	0	0	2	8	1	1	4	2	0	1	2	9
Taiwan vs. Mexico	0	0	2	8	1	1	4	2	0	1	4	7
Taiwan vs. Other	0	0	2	8	1	2	4	3	0	1	2	8
Turkey vs. Canada	0	0	2	8	1	1	5	2	0	2	0	9
Turkey vs. Mexico	0	0	2	8	1	1	4	2	0	2	2	8
Turkey vs. Other	0	0	2	8	1	2	5	3	0	2	1	8
Canada vs. Mexico	0	0	2	8	1	1	4	2	0	1	3	8
Canada vs. Other	0	0	2	8	1	1	5	3	0	1	2	7
Mexico vs. Other	0	0	2	8	1	1	4	3	0	1	2	8

[1] Comparisons with Korea reflect comparisons of subject product from POSCO in Korea.

Note.--A=Always, F=Frequently, S=Sometimes, N=Never.

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

Similar to the responses for interchangeability, importers and purchasers stated that significant factors other than price between domestically produced CTL plate and imported CTL plate by subject countries are quality, chemistry, ability to produce, lead times, pre-qualification, supply risk, geographic and logistics factors. Importer and purchaser *** reported that physical differences in thickness, width, grades, technical support, and/or the ultimate consumer perception and quality control departments' approval process differentiate its plate products from the others.

ELASTICITY ESTIMATES

U.S. supply elasticity

The domestic supply elasticity[32] for CTL plate measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of CTL plate. The elasticity of domestic supply depends on several factors including the level of excess capacity, the ease with which producers can alter capacity, producers' ability to shift to production of other products, the existence of inventories, and the availability of alternate markets for U.S.-produced CTL plate. Analysis of these factors earlier indicates that the U.S. industry is likely to be able to increase or decrease shipments to the U.S. market in a moderate-to-large manner based on unused capacity and production flexibilities; an estimate in the range of 2.5 to 5 is suggested.

U.S. demand elasticity

The U.S. demand elasticity for CTL plate measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of CTL plate. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the CTL plate in the production of any downstream products. Because of a lack of close, broadly accepted substitutes, it is likely that the aggregate demand for plate is moderately inelastic, with values ranging between -0.25 and -0.75.

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.[33] Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/ discounts/ promotions, etc.). Based on available information, the elasticity of substitution between the majority of U.S.-produced CTL plate and imported CTL plate is likely to be in the range of 3 to 5, however for certain products that are reportedly not available from domestic manufacturers (e.g., certain grades of tool steel, high-speed steel, plate for offshore applications, certain sizes of X-70 plate, etc.) the elasticity of substitution will be diminished.

[32] A supply function is not defined in the case of a non-competitive market.

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

PART III: U.S. PRODUCERS' PRODUCTION, SHIPMENTS, AND EMPLOYMENT

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the subsidies and dumping margins was presented in *Part I* of this report and information on the volume of subject imports and pricing of domestic and imported products are presented in *Part IV* and *Part V*, respectively. Information on the other factors specified is presented in this section and/or *Part VI* and (except as noted) is based on the questionnaire responses of 21 firms that accounted for a substantial majority of U.S. production of CTL plate during 2015. Data was requested from both steel mills and steel processors of CTL plate (firms that purchase steel coils and cut them to length).

U.S. PRODUCERS

The Commission issued a U.S. producer questionnaire to 21 firms identified as steel mills and 10 firms identified as steel processors of CTL plate.[1] Twenty-one firms (*i.e.*, nine mills and 12 processors)[2] provided useable data on their productive operations.[3] Staff believes that these responses represent a substantial majority of U.S. production of CTL plate.

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[1] The 21 mills identified are as follows: All Metals, Anderson, Allegheny, ArcelorMittal USA, Carpenter, Crucible, CMC, Composite Forgings, EDRO, Ellwood, EVRAZ, Finkl, Gerdau, Joy Global, JSW, Niagara, Nucor, Optima, SSAB, Universal, and U.S. Steel Corporation. The 10 firms identified as steel processors of CTL plate are as follows: American, Cargill, Feralloy, Friedman, Kloeckner, Lapham-Hickey, Olympic, Reliance, Ryerson, and Steel Warehouse. Although *** certified that they are not producers or processors of CTL plate during the preliminary phase of these investigations, Staff issued a U.S. producer questionnaire to these firms since they submitted completed questionnaires in the five-year review investigations on CTL plate (*Investigation Nos. 731-TA-753, 754, and 756 (Third Review): Cut-to-Length Carbon Steel Plate from China, Russia, and Ukraine*, U.S. Producer Questionnaire, item II-7).

[2] The Commission received more questionnaire responses than were issued due to ***.

[3] The Commission received 12 completed questionnaires from AHT, ArcelorMittal USA, Cargill, CMC, EVRAZ, Friedman, Gerdau, JSW, Niagara, Nucor, SSAB, and Universal with usable trade and financial data. While the processors Allegheny, American Steel, Feralloy, Kloeckner, Metals USA, PDM, Reliance, Ryerson, and Steel Warehouse submitted questionnaire responses to the Commission, they did not provide usable financial results. The CTL plate operations of these companies, therefore, are not reflected in Part VI of the report. These companies represented *** percent of U.S. commercial shipments and *** percent of total shipments by quantity in 2015.

In addition, ***. ***.

Four firms identified as steel mills (Carpenter, Finkl, Optima, and U.S. Steel Corporation) and two firms identified as steel processors (Lapham-Hickey and Olympic) certified that they do not produce or process subject CTL plate. Finkl, however, submitted comments indicating that they did not receive a questionnaire, which is in contrast with the Commission's record. Finkl explained that it is one of the largest tool steel producers in the United States and completed construction on its new steel mill in

(*continued*...)

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

Table III-1
CTL plate: U.S. producers, their positions on the petition, location of production, and share of reported production, 2015

Firm	Position on petition	Production location(s)	Share of production (percent)
AHT	***	Pell City, AL Chicora, PA	***
Allegheny	***	Indianola, PA	***
American	***	Oregon (Canby)	***
ArcelorMittal USA	Petitioner	Indiana (Burns Harbor, Gary[1]) North Carolina (Newton) Pennsylvania (Coatesville, Conshohocken, Steelton)	***
Cargill	***	Colorado (Fort Collins) Illinois (Granite City) Indiana (East Chicago) Tennessee (Loudon, Nashville) Texas (Houston)	***
CMC	***	Alabama (Birmingham) Texas (Segiun)	***
EVRAZ	***	Delaware (Claymont) Oregon (Portland)	***
Ferralloy	***	Alabama (Decatur) California (Stockton) Indiana (Portage) South Carolina (Huger)	***
Friedman	***	Arkansas (Hickman) Alabama (Decatur)	***

Table continued on next page.

(…*continued*)
addition to relocating to its current mill in 2014. Finkl currently has *** tons of available capacity for tool steel, although it has lost over *** percent of its sales tonnage and *** percent of its average sales price since 2014. Finkl Steel's Comments, pp. 1-2. Furthermore, Siskin Steel & Supply Co., a steel distributor owned by Reliance, certified that it does not process subject CTL plate. Six additional steel mills (All Metals & Forge Group, Anderson Schumaker Company, Composite Forgings, Crucible, EDRO, and Ellwood) did not respond to the Commission's questionnaire.

***.

Furthermore, the Commission issued supplemental questionnaires to U.S. producers (***) of tool steel and high speed steel CTL plate in order to present tool/high speed CTL plate domestic industry data.

Table III-1—Continued
CTL plate: U.S. producers, their position on the petition, location of production, and share of reported production, 2015

Firm	Position on petition	Production location(s)	Share of production (percent)
Gerdau	***[2]	Georgia (Cartersville) Kentucky (Calvert City) Tennessee (Jackson)	***
JSW	***	Texas (Baytown)	***
Kloeckner	***	California (Santa Fe Springs, Tulare) Connecticut (Middletown) North Carolina (Charlotte) Oklahoma (Catoosa) South Carolina (Charleston) Texas (Houston).	***
Metals USA	***	Pennsylvania (Philadelphia)	***
Niagara	***[3]	New York (Akron)	***[5]
Nucor[4]	Petitioner	Alabama (Tuscaloosa) North Carolina (Cofield) Texas (Longview)	***
PDM	***	California (Stockton)	***
Reliance	***	Kansas (Wichita) Utah (Salt Lake City)	***
Ryerson	***	Arkansas (Blytheville) California (Vernon) Kentucky (Shelbyville) Pennsylvania (Ambridge) Texas (Carrollton)	***
SSAB	Petitioner	Alabama (Axis) Iowa (Montpelier) Minnesota (Roseville) Texas (Houston)	***
Steel Warehouse	***	Illinois (Rock Island) Indiana (South Bend) Tennessee (Chattanooga, Memphis)	***
Universal	***	Pennsylvania (Bridgeville)	***
Total			100.0

[1] ArcelorMittal USA's rolling mill in Gary, Indiana was idled in 2008 and permanently closed in May 2015.
[2] Gerdau ***.
[3] Niagara ***.
[4] Nucor ***.
[5] ***.

Note.--Total may not sum to 100 percent due to rounding.

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

Related firms

Table III-2 presents information on responding U.S. producers' ownership and related and/or affiliated firms. As shown, the following U.S. producers are related to foreign producers of CTL plate in the subject countries: ***. In addition, as discussed in greater detail below, six U.S. producers (***) reported direct imports of the subject merchandise and seven U.S. producers reported purchases of the subject merchandise from U.S. importers.

Table III-2
CTL plate: U.S. producers' ownership, related and/or affiliated firms, since January 2013

* * * * * * *

Tolling operations

Three of the responding U.S. mills *** reported that they have been involved in toll agreements regarding the production of CTL plate. However, none of these mills operate exclusively under toll agreements:

- ***.
- ***
- ***.

Six of the responding U.S. processors reported that they have been involved in toll agreements regarding the processing of CTL plate:

- ***.[4]
- ***.
- ***.
- ***.
- ***.
- ***.

[4] ***. ***.

Changes in operations

Table III-3 summarizes recent important events that have taken place in the United States since January 1, 2013. Specifically, 13 domestic CTL plate producers reported in their questionnaire responses changes in their operations related to the production of CTL plate since January 1, 2013. Such changes are presented in table III-4.

Table III-3
CTL plate: Important industry events since January 1, 2013

Date		Company	Action
Month	Year		
February	2013	Kentucky Electric Steel[1]	Optima Specialty Steel purchased Kentucky Electric Steel.[2]
June		Nucor[3]	Production starts at a new 120,000 ton normalizing line, which brings Hertford's value-added plate production capacity to 240,000 tons.[4]
October		EVRAZ[3]	EVRAZ North America announced the suspension of operations at its Claymont, Delaware facility, citing poor market conditions.[5]
June	2014	SSAB[3]	Announced feasibility study to expand melting and casting capabilities by up to 1.2 million tons above current melting capacity at its Montpelier, Iowa facility to be transferred as slab to SSAB's Mobile, Alabama facility for rolling and finishing.[6]
October		Cargill[7]	Full operations began at Cargill's newly constructed service center in Windsor, Colorado.[8]
March	2015	EVRAZ[3]	The Claymont, Delaware plate mill was sold at auction on March 4-5, 2015.The mill has been idled since October 2013.[9]
May		ArcelorMittal[3]	After being idled in 2008, ArcelorMittal permanently closed its plate rolling operations in Gary, Indiana.[10]
September		Cargill[7]	Announced plans to close its service center in Nashville, Tennessee in early 2016.[11]
January	2016	Nucor[3]	Nucor direct reduced iron facility resumes operations at the end of January 2016.[12]
June		ArcelorMittal[3]	ArcelorMittal reaches a labor agreement with the United Steelworkers that runs to September 1, 2018.[13]
August		Joy Global[3]	Joy Global sells its plate mill operation in Longview, TX to Nucor.[14]
September		Gerdau[1]	Files a Worker Adjustment and Retraining Notification (WARN) Act notice with Kentucky labor officials that the Calvert City, Kentucky mill will be indefinitely idled November 15, 2016. About 138 workers will be affected.[15]

Table continued on next page.

Table III-3—Continued
CTL plate: Important industry events since January 1, 2013

Date		Company	Action
Month	Year		
		Nucor	Nucor acquired Republic Conduit. A maker of steel electrical conduit, for $335 million. This acquisition would make Nucor a market leader in electric conduit as Republic Conduit employs about 300 non-unionized workers at two mills in Louisville, KY and Cedar Springs, GA with annual volume of 146,000 tons.[16]
December	2016	Optima	Optima filed for bankruptcy protection on December 15, 2016.[17]

[1] A flat bar producer.
[2] Optima Specialty Steel, Inc., "Optima Specialty Steel, Inc. to Acquire Kentucky Electric Steel," press release, February 5, 2013.
[3] A traditional plate producer.
[4] American Metal Market, "Planned Expansions at Nucor Push Ahead," July 19, 2013
[5] American Metal Market, "EVRAZ to Idle Claymont Steel Plate Mill Within Two Months," October 14, 2013.
[6] SSAB, **"**SSAB is Looking to Expand its Facility in Montpelier, Iowa, U.S.," press release, June 19, 2014.
[7] A service center.
[8] WindsorNow! (newspaper), "Cargill's Windsor Facility Benefits Northern Colorado Community, Attracts New Companies," May 23, 2015.
[9] American Metal Market, "EVRAZ to Raze Claymont Steel Plate Mill," November 11, 2014; American Metal Market, EVRAZ's Plate Mill Auction Set," November 17, 2014; Myron Bowling Auctioneers, Inc., "Auctions: EVRAZ Claymont Steel, Inc." http://www.myronbowling.com/Auctions/Former-EVRAZ-Claymont-Steel-Inc-726C50.html?LayoutID=23.
[10] ArcelorMittal news release, "Testimony of Jeff Unruth: ITC hearing on cut-to-length carbon steel plate from China, Russia, and Ukraine," September 29, 2015, http://usa.arcelormittal.com/News-and-media/Announcements/2015/sep/testimony-of-jeff-unruh-itc-hearing-on-cut-to-length-carbon-steel-plate/.
[11] Metal Center News, "Cargill to Close Nashville Facility," September 30, 2015.
[12] American Recycler, "Nucor Steel Louisiana DRI Plant to Resume Operations," http://americanrecycler.com/8568759/index.php/news/metal-recycling/1558-nucor-steel-louisiana-dri-to-resume-operations.
[13] United Steelworkers News Release, "Steelworkers Ratify Agreement with ArcelorMittal USA," June 23, 2016, http://www.usw.org/news/media-center/articles/2016/steelworkers-ratify-agreement-with-arcelormittal-usa.
[14] Joy Global, Inc., press release, "Joy Global completes sale of Texas steel plate mill," August 5, 2016.
[15] American Metal Market, "Gerdau's Calvert City mill to be idled Nov. 15," September 28, 2016.
[16] American Metal Market, "Nucor to acquire Republic Conduit for $335M," December 15, 2016.
[17] American Metal Market, "Optima Specialty Steel files for Ch. 11," December 15, 2016.

Source: Compiled from news articles and company news releases as noted above.

Table III-4
CTL plate: Reported changes in operations by U.S. producers, since January 1, 2013

* * * * * * *

U.S. PRODUCTION, CAPACITY, AND CAPACITY UTILIZATION

CTL plate

Table III-5 and figure III-1 present U.S. producers' production, capacity, and capacity utilization. Domestic producers' aggregate capacity fell overall by 3.3 percent as five U.S. producers (***) reported plant closings another five U.S. producers (***) reported prolonged shutdowns or curtailments (see table III-4).[5] Overall capacity was approximately the same during January to September 2016 compared with January to September 2015. With the permanent closure of EVRAZ's Claymont facility in December 2013, aggregate overall capacity decreased by 3.4 percent (436,965 short tons) from 2013 to 2014 despite the fact that several firms reported capacity increases from 2013 to 2014. PDM, for example, ***.

Domestic production followed a somewhat different year-to-year trend, increasing by 7.9 percent from 2013 to 2014, decreasing by 18.5 percent from 2014 to 2015, and was 7.4 percent lower during January to September 2016 than during January to September 2015. Thirteen of the 21 responding domestic producers reported declines in production from 2014 to 2015. The largest share of the decline (*** percent) was accounted for by ***. Reported production was 12.1 percent lower in 2015 than in 2013. Capacity utilization likewise increased from 66.4 percent in 2013 to 74.1 percent in 2014, fell to 60.3 percent in 2015, and was 59.3 percent during January to September 2016 compared with 64.0 percent during January to September 2015.

[5] ***. ***.

Table III-5
CTL plate: U.S. producers' production, capacity, and capacity utilization, 2013-15, January to September 2015, and January to September 2016

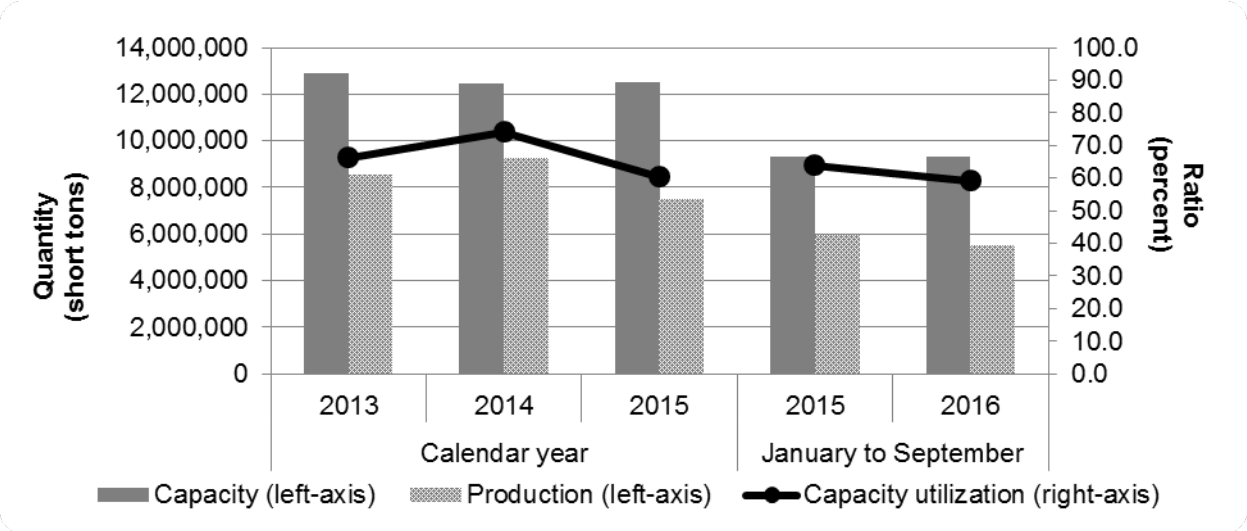
Item	Calendar year			January to September	
	2013	2014	2015	2015	2016
Capacity (short tons)					
ArcelorMittal	***	***	***	***	***
EVRAZ	***	***	***	***	***
Nucor	***	***	***	***	***
SSAB	***	***	***	***	***
All other mills	***	***	***	***	***
All mills	9,845,469	9,370,469	9,380,065	7,034,163	7,034,034
All processors	3,067,235	3,105,270	3,107,035	2,307,416	2,306,526
Total capacity	12,912,704	12,475,739	12,487,100	9,341,579	9,340,560
Production (short tons)					
ArcelorMittal	***	***	***	***	***
EVRAZ	***	***	***	***	***
Nucor	***	***	***	***	***
SSAB	***	***	***	***	***
All other mills	***	***	***	***	***
All mills	6,909,720	7,488,986	5,979,916	4,753,206	4,503,280
All processors	1,659,103	1,753,581	1,549,001	1,226,639	1,033,346
Total production	8,568,823	9,242,567	7,528,917	5,979,845	5,536,626
Capacity utilization (percent)					
ArcelorMittal	***	***	***	***	***
EVRAZ	***	***	***	***	***
Nucor	***	***	***	***	***
SSAB	***	***	***	***	***
All other mills	***	***	***	***	***
All mills	70.2	79.9	63.8	67.6	64.0
All processors	54.1	56.5	49.9	53.2	44.8
Average capacity utilization	66.4	74.1	60.3	64.0	59.3

Note.--Most responding mill operating domestic producers reported capacity based on operating 160-168 hours per week. ***. Most responding processors reported capacity based on operating 40-80 hours per week. ***. All producers and processors providing this information reported capacity based on operating 49-52 weeks per year.

Note.--ArcelorMittal USA did not include in its capacity data that of its Gary, Indiana facility. The Gary rolling mill was idled in 2008 and was permanently closed in May 2015. The heat treating facilities at the Gary mill continue to operate. Before its permanent closure, the Gary facility had an annual rolling capacity of *** short tons.

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

Figure III-1
CTL plate: U.S. producers' production, capacity, and capacity utilization, 2013-15, January to September 2015, and January to September 2016



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

Alternative products

As shown in table III-6, the majority of product produced by U.S. producers on mill operations and produced from purchased coil is subject CTL plate, which accounted for 67.5 percent of total facility production of all products on mill operations and 80.4 percent of all products produced from purchased coil on the same machinery during 2015. Twelve of the 21 responding firms reported data concerning production of alternative products on the same equipment or using the same employees as CTL plate. Production of out-of-scope items accounted for 32.5 percent of total plant production on mill operations and 19.6 percent of total production from purchased coil by CTL plate producers during 2015.

Table III-6
CTL plate: U.S. producers' overall plant capacity and production on the same equipment as subject production, 2013-15, January to September 2015, and January to September 2016

Item	Calendar year			January to September	
	2013	2014	2015	2015	2016
PRODUCTION FROM MILL OPERATIONS:	**Quantity (short tons)**				
Overall mill capacity	11,766,318	11,266,318	11,334,858	8,509,105	8,508,182
Mill production:					
CTL plate	5,950,986	6,427,852	5,126,207	4,082,625	3,832,467
Out-of-scope production[1]	2,596,953	2,698,212	2,470,994	1,778,890	1,850,531
Total production on same machinery	8,547,939	9,126,064	7,597,201	5,861,515	5,682,998
	Ratios and shares (percent)				
Overall mill capacity utilization	72.6	81.0	67.0	68.9	66.8
Share of mill production:					
CTL plate	69.6	70.4	67.5	69.7	67.4
Out-of-scope production	30.4	29.6	32.5	30.3	32.6
Total production on same machinery	100.0	100.0	100.0	100.0	100.0
PRODUCTION FROM PURCHASED COIL:	**Quantity (short tons)**				
Overall coil capacity	5,394,860	5,457,360	5,457,360	4,093,020	4,093,020
Production using purchased coil:					
CTL plate	2,617,837	2,814,715	2,402,710	1,897,220	1,704,159
Out-of-scope production[2]	740,080	773,545	584,955	481,800	404,130
Total production on same machinery	3,357,917	3,588,260	2,987,665	2,379,020	2,108,289
	Ratios and shares (percent)				
Overall capacity utilization from coils	62.2	65.8	54.7	58.1	51.5
Share of production using purchased coil:					
CTL plate	78.0	78.4	80.4	79.7	80.8
Out-of-scope production	22.0	21.6	19.6	20.3	19.2
Total production on same machinery	100.0	100.0	100.0	100.0	100.0

[1] Out-of-scope production listed by responding producers on mill operations include out-of-scope CTL plate (***), angles, bar, posts, channels and rebar (***), wide flange beams and angles (***), sheet, stainless steel, titanium and other non-iron alloys (***), steel coils (***), and various billets and slabs (***).

[2] Out-of-scope production listed by responding producers of CTL plate from purchased coil include sheet (***), galvanized, cold-rolled, hot-rolled, hot-rolled pickled, and oiled steel (***), hot-rolled coil (***), hot-rolled sheet and heavy gauge galvanized sheet (***), and CTL sheet (***).

Note.--No firm reported capacity or production of CTL plate from forging operations. Nucor explained that ***. ***.
Note.--***.

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

U.S. PRODUCERS' U.S. SHIPMENTS AND EXPORTS

Table III-7 presents U.S. producers' U.S. shipments, export shipments, and total shipments. These data show that the quantity and value of U.S. producers' total shipments increased from 2013 to 2014, but declined in 2015 to a level below that reported in 2013. The quantity and value of total shipments were also lower during January to September 2016 than during January to September 2015. Similarly, average unit values increased from 2013 to 2014 but fell in 2015, and were lower during January to September 2016 than during January to September 2015.

During 2015, 89.4 percent of the quantity of domestic producers' total shipments of CTL plate were shipments to the U.S. market, *** of which were commercially shipped. In fact, internal consumption and company transfers accounted for *** percent of total domestic producers' shipments during 2015. The following eight domestic producers reported internal consumption and/or domestic transfers to related companies: ***. Domestic producers' exports, which accounted for 10.6 percent of U.S. producers' total shipments during 2015, were reported by seven responding domestic producers. All seven producers identified Canada and Mexico as included their primary export markets for CTL plate. *** were the largest exporters, together accounting for *** percent of domestic producers' U.S. exports during 2015.

Table III-7
CTL plate: U.S. producers' U.S. shipments, export shipments, and total shipments, 2013-15, January to September 2015, and January to September 2016

Item	Calendar year			January to September	
	2013	2014	2015	2015	2016
	Quantity (short tons)				
U.S. shipments	7,921,986	8,157,818	6,807,726	5,393,745	4,992,656
Export shipments	736,490	912,996	807,911	621,903	652,762
Total shipments	8,658,476	9,070,814	7,615,637	6,015,648	5,645,418
	Value (1,000 dollars)				
U.S. shipments	6,084,393	6,883,745	4,703,435	3,900,417	3,008,689
Export shipments	582,251	779,486	573,212	466,475	387,287
Total shipments	6,666,644	7,663,231	5,276,647	4,366,892	3,395,976
	Unit value (dollars per short ton)				
U.S. shipments	768	844	691	723	603
Export shipments	791	854	709	750	593
Total shipments	770	845	693	726	602
	Share of quantity (percent)				
U.S. shipments	91.5	89.9	89.4	89.7	88.4
Export shipments	8.5	10.1	10.6	10.3	11.6
Total shipments	100.0	100.0	100.0	100.0	100.0
	Share of value (percent)				
U.S. shipments	91.3	89.8	89.1	89.3	88.6
Export shipments	8.7	10.2	10.9	10.7	11.4
Total shipments	100.0	100.0	100.0	100.0	100.0

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

U.S. PRODUCERS' INVENTORIES

Table III-8 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments during 2013-15, January to September 2015, and January to September 2016**.** Inventories increased by 21.4 percent from 2013 to 2014, decreased by 8.7 percent from 2014 to 2015, and were 12.0 percent lower during January to September 2016 than during January to September 2015. Inventories were equivalent to between 9.5 and 12.0 percent of U.S. producers' total shipments during 2013-15, and were 10.7 percent during January to September 2016 as compared to 11.4 percent during January to September 2015. All responding domestic producers with the exception of ***[6] reported holding end-of-period inventories of CTL plate. Domestic producers *** accounted for the largest share of the increase in inventories, together holding *** percent of total domestic inventories by year-end 2015.

[6] ***. ***.

Table III-8
CTL plate: U.S. producers' inventories, 2013-15, January to September 2015, and January to September 2016

Item	Calendar year			January to September	
	2013	2014	2015	2015	2016
	Quantity (short tons)				
U.S. producers' end-of-period inventories	823,720	999,797	913,079	916,457	806,036
	Ratio (percent)				
Ratio of inventories to.--					
U.S. production	9.6	10.8	12.1	11.5	10.9
U.S. shipments	10.4	12.3	13.4	12.7	12.1
Total shipments	9.5	11.0	12.0	11.4	10.7

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

U.S. PRODUCERS' IMPORTS AND PURCHASES

Six U.S. producers indicated in their responses to Commission questionnaires that they imported CTL plate since January 1, 2013; these six firms also provided responses to the Commission's U.S. importer questionnaire. Four U.S. producers (***) reported imports of CTL plate from nonsubject sources as well as imports of CTL plate from ***. One U.S. producer (***) reported imports of CTL plate from only nonsubject countries. In addition, one U.S. producer (***) is related to U.S. importer *** through a common corporate parent.[7] *** reported imports of CTL plate from ***. Furthermore, seven U.S. producers (***) reported purchases of U.S. imports.

U.S. producers' imports of CTL plate, as well as the imports of related U.S. importer ***, are presented in table III-9. U.S. producers' purchases of CTL plate are presented in table III-10.

Table III-9
CTL plate: U.S. producers' U.S. production and imports, 2013-15, January to September 2015, and January to September 2016

* * * * * * *

Table III-10
CTL plate: U.S. producers' U.S. production and purchases of imports, 2013-15, January to September 2015, and January to September 2016

* * * * * * *

[7] Reasons for importing CTL plate include ***.

U.S. employment, wages, and productivity

At the preliminary conference, ArcelorMittal USA testified that as it saw demand conditions improving in early 2014, it added capacity and a second crew to one of its rolling mills in Burns Harbor, Indiana. However, it stated that as imports increased in late 2014, it took the second crew off and continued to see downsizing in 2015, especially in connection with the closure of its Gary, Indiana mill.[8] ArcelorMittal USA also testified at the hearing that it had experienced layoffs of about 15 percent of its workforce in its Coatesville, Pennsylvania plant, and at least one-third of the workers at the Conshohoken, Pennsylvania plant are already receiving trade adjustment assistant benefits.[9] In addition, domestic producer SSAB testified that, although it did not enact worker layoffs directly, it reduced employee compensation based on production and shipments and reduced its workforce through attrition.[10] Domestic producer Nucor testified that it operates under a "no layoff" policy, but that its workers' salaries and bonuses were negatively impacted during the production downturn.[11]

U.S. producers' employment-related data as provided in response to Commission questionnaires are shown in table III-11. U.S. producers' employment measured by production and related workers increased by 5.3 percent from 2013 to 2014, decreased by 4.8 percent from 2014 to 2015, and were 8.5 percent lower during January to September 2016 than during January to September 2015. Hours worked by production employees and wages paid followed the same trend, with *** accounting for the majority of the overall decline in hours worked and wages paid from 2013 to 2015. Domestic producers' reported productivity increased by 0.9 percent from 2013 to 2014, decreased by 10.1 percent from 2014 to 2015, but was 5.7 percent higher during January to September 2016 than during January to September 2015. Unit labor costs increased by 10.2 percent from 2013 to 2015, but were 1.4 percent lower during January to September 2016 than during January to September 2015.

Table III-11
CTL plate: U.S. producers' employment related data, 2013-15, January to September 2015, and January to September 2016

Item	Calendar year			January to September	
	2013	2014	2015	2015	2016
Production and related workers (PRWs) (number)	4,579	4,823	4,591	4,694	4,296
Total hours worked (1,000 hours)	10,000	10,688	9,687	7,707	6,751
Hours worked per PRW (hours)	2,184	2,216	2,110	1,642	1,571
Wages paid ($1,000)	344,601	383,957	333,810	266,096	242,910
Hourly wages (dollars per hour)	$34.46	$35.92	$34.46	$34.53	$35.98
Productivity (short tons per 1,000 hours)	856.9	864.8	777.2	775.9	820.1
Unit labor costs (dollars per short ton)	$40.22	$41.54	$44.34	$44.50	$43.87

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

[8] Conference transcript, pp. 60-61 (Unruth and Insetta).
[9] Hearing transcript, p. 60 (Trinidad).
[10] Conference transcript, pp. 61-62 (Moskaluk).
[11] Conference transcript, pp. 62-63 (Whiteman and Price).

PART IV: U.S. IMPORTS, APPARENT U.S. CONSUMPTION, AND MARKET SHARES

U.S. IMPORTERS

The Commission issued importer questionnaires to 266 firms believed to be importers of subject CTL plate, as well as to all U.S. producers of CTL plate.[1] Usable questionnaire responses were received from 93 companies, representing *** U.S. imports of CTL plate from all subject sources combined and approximately *** of nonsubject sources combined in 2015.[2] Import data in this report are based on official Commerce statistics for CTL plate.[3]

[1] The Commission issued questionnaires to those firms identified in the petition, along with firms that, based on a review of data provided by ***, may have accounted for more than 0.2 percent of total imports under the following HTS statistical reporting numbers since 2013: 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.1190 (during 2013-15 and was replaced with 7225.40.1180 at the beginning of 2016) 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000. These HTS statistical reporting numbers also were used to generate the import data presented in this report.

[2] The coverage estimate presented is based on official import statistics. Country-specific estimates appear in Part I of this report.

[3] Data concerning certain forms of CTL plate that were specifically excluded from the scope (and which are accounted for in the HTS numbers used in the compilation of the report) were collected separately in importer questionnaire responses. These reported import data on excluded forms (primarily from ***) accounted for less than *** percent of total reported U.S. imports in each of the annual periods from 2013 to 2015 and interim periods during 2015 and 2016. These data were used to adjust official statistics as presented in table IV-2.

Data concerning subject imports from Korea presented throughout this report include all U.S. imports of CTL plate produced by POSCO and POSCO affiliates. In addition, subject imports include imports from Korea produced/exported by non-POSCO entities, provided such imports were not subject to the existing antidumping and countervailing duty orders (*i.e.*, alloy steel plate).[4]

Table IV-1 lists all responding U.S. importers of CTL plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, Turkey, and other sources, their locations, and their shares of U.S. imports, in 2015.

[4] Antidumping and countervailing duty orders are currently in place on imports of certain cut-to-length carbon steel plate products from Korea. *Notice of Final Determination of Sales at Less Than Fair Value: Certain Cut-To-Length Carbon-Quality Steel Plate Products from Korea*, 64 FR 73196, December 29, 1999 (as amended, 65 FR 6585, February 10, 2000); *Final Affirmative Countervailing Duty Determination: Certain Cut-to-Length Carbon-Quality Steel Plate From the Republic of Korea*, 64 FR 73176, Dec. 29, 1999 (as amended, 65 FR 6587, February 10, 2000). The scope of these current antidumping and countervailing duty investigations with respect to CTL plate from Korea covers only (1) subject CTL plate not within the physical description of cut-to-length carbon quality steel plate in the 1999 orders, regardless of producer or exporter; and (2) CTL plate produced and/or exported by POSCO and its affiliates, which were excluded or revoked from the 1999 orders as of April 8, 2016. There is also an antidumping duty order currently in place on imports of certain cut-to-length carbon steel plate from China. *Suspension Agreement on Certain Cut-to-Length Carbon Steel Plate From the People's Republic of China; Termination of Suspension Agreement and Notice of Antidumping Duty Order*, 68 FR 60081, October 21, 2003 (as amended 76 FR 50996, 50996-97, August 17, 2011). Since there is no companion countervailing duty order in place on such imports from China, U.S. imports of CTL plate from China are presented as subject imports for purposes of the countervailing duty petition throughout this report.

Table IV-1
CTL plate: U.S. importers, their headquarters, and share of imports by source, 2015

Firm	Headquarters	Share of imports by source (percent)							
		Austria	Belgium	Brazil	China	France	Germany	Italy	Japan
A.M. Castle & Co.	Oak Brook, IL	***	***	***	***	***	***	***	***
Abelardo A. Salinas Inc.	Laredo, TX	***	***	***	***	***	***	***	***
Acier Wirth Steel	Montreal, QC	***	***	***	***	***	***	***	***
AHMSA International	San Antonio, TX	***	***	***	***	***	***	***	***
AIDA America Corp	Dayton, OH	***	***	***	***	***	***	***	***
Artco Group International	White Plains, NY	***	***	***	***	***	***	***	***
Berg Steel	Panama City, FL	***	***	***	***	***	***	***	***
Bestar LLC	Atlanta, GA	***	***	***	***[3]	***	***	***	***
Bluescope Steel Americas	Long Beach, CA	***	***	***	***	***	***	***	***
Bohler-Uddeholm Corporation	Elgin, IL	***	***	***	***	***	***	***	***
C&F International Incorporated	Houston, TX	***	***	***	***	***	***	***	***
C.V. Aceros AG	Zurich, Switzerland	***	***	***	***	***	***	***	***
CMC	Irving, TX	***	***	***	***	***	***	***	***
Cotia (USA) Ltd.	New York, NY	***	***	***	***	***	***	***	***
CPW America Co.	Houston, TX	***	***	***	***	***	***	***	***
Curfman Steel Corporation	Sunnyside, WA	***	***	***	***	***	***	***	***
Dillinger America, Inc.	Chicago, IL	***	***	***	***	***	***	***	***
Dosco America, Inc.	Torrance, CA	***	***	***	***	***	***	***	***
Duferco Steel Inc.	Matawan, NJ	***	***	***	***	***	***	***	***
Dura-Bond Pipe, LLC	Export, PA	***	***	***	***	***	***	***	***
Dynamic Materials Corp.	Boulder, CO	***	***	***	***	***	***	***	***
Edgen Murray Corporation	Baton Rouge, LA	***	***	***	***	***	***	***	***
EDRO	Walnut, CA	***	***	***	***	***	***	***	***
EEW Steel Trading, LLC	Houston, TX	***	***	***	***	***	***	***	***
Empire Resources Inc.	Fort Lee, NJ	***	***	***	***	***	***	***	***
EVRAZ	Chicago, IL	***	***	***	***	***	***	***	***
Ferrum International Ltd	New York, NY	***	***	***	***	***	***	***	***
GHM America Corporation	Duluth, GA	***	***	***	***	***	***	***	***
Global Metal Services, Ltd.	Chagrin Falls, OH	***	***	***	***	***	***	***	***
Great Lakes Towers, LLC	Monroe, MI	***	***	***	***	***	***	***	***
GS Global USA, Inc	Cerritos, CA	***	***	***	***	***	***	***	***
Hanwa American Corp.	Houston, TX	***	***	***	***	***	***	***	***

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Table IV-1—Continued
CTL plate: U.S. importers, their headquarters, and share of imports by source, 2015

Firm	Headquarters	Share of imports by source (percent)							
		Austria	Belgium	Brazil	China	France	Germany	Italy	Japan
Hitachi Metals America, Ltd.	Purchase, NY	***	***	***	***	***	***	***	***
Hyundai Corporation (USA)	Englewood Cliffs, NJ	***	***	***	***	***	***	***	***
Industeel USA, LLC	Coatesville, PA	***	***	***	***	***	***	***	***
Intsel Steel Distributors	Houston, TX	***	***	***	***	***	***	***	***
Janco Steel Ltd.	Stoney Creek, ON	***	***	***	***	***	***	***	***
JFE Shoji Trade America, Inc.	Long Beach, CA	***	***	***	***	***	***	***	***
Kanematsu USA Inc.	New York, NY	***	***	***	***	***	***	***	***
Kenwal Canada Inc.	Toronto, ON	***	***	***	***	***	***	***	***
Kloeckner	Roswell, GA	***	***	***	***	***	***	***	***
Kopo International, Inc	Hazlet, NJ	***	***	***	***	***	***	***	***
Latrobe Specialty Metals Distribution	Vienna, OH	***	***	***	***	***	***[3]	***	***
Lyman Steel Company	Warresnville Hts, OH	***	***	***	***	***	***	***	***
Macsteel International USA Corp.	White Plains, NY	***	***	***	***	***	***	***	***
Marubeni Itochu Steel Canada Inc.	Burnaby, BC	***	***	***	***	***	***	***	***
Marubeni-Itochu Steel America Inc.	New York, NY	***	***	***	***	***	***	***	***
MC Tubular Products, Inc.	Houston, TX	***	***	***	***	***	***	***	***
Metal One America Inc.	Rosemont, IL	***	***	***	***	***	***	***	***
Metallia U.S.A., LLC	Fort Lee, NJ	***	***	***	***	***	***	***	***
Mitsui & Co. (USA), Inc.	New York, NY	***	***	***	***	***	***	***	***
MS Global Steel, Inc.	Cerritos, CA	***	***	***	***	***	***	***	***
MX Industrial Corporation	City Of Industry, CA	***	***	***	***	***	***	***	***
Nippon Steel & Sumikin Bussan Americas, Inc.	Houston, TX	***	***	***	***	***	***	***	***
NLMK North America Plate LLC	Moon Township, PA	***	***	***	***	***	***	***	***
Okaya (USA) Inc	Arlington Heights, IL	***	***	***	***	***	***	***	***
Olbert Metal Sales Inc.	Mississauga, ON	***	***	***	***	***	***	***	***
Optima Steel International, LLC	Concord, CA	***	***	***	***	***	***	***	***
PCS Company	Fraser, MI	***	***	***	***	***	***	***	***
PlatesAhead Inc.	Birmingham, AL	***	***	***	***	***	***	***	***
POSCO America Corporation	Fort Lee, NJ	***	***	***	***	***	***	***	***
POSCO Daewoo America Corp.	Teaneck, NJ	***	***	***	***	***	***	***	***
Precision Industies Inc.	Washington, PA	***	***	***	***	***	***	***	***
Rushmore Enterprises Inc.	Baytown, TX	***	***	***	***	***	***	***	***

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Table IV-1—Continued
CTL plate: U.S. importers, their headquarters, and share of imports by source, 2015

Firm	Headquarters	Share of imports by source (percent)							
		Austria	Belgium	Brazil	China	France	Germany	Italy	Japan
Ryerson	Chicago, IL	***	***	***	***	***	***	***	***
Salzgitter Mannesmann International GmbH	Dusseldorf, Germany	***	***	***	***	***	***	***	***
Salzgitter Mannesmann International USA Inc.	Houston, TX	***	***	***	***	***	***	***	***
Samsung C&T America, Inc	Ridgefield Park, NJ	***	***	***	***	***	***	***	***
Samuel, Son & Co., Limited	Mississauga, ON	***	***	***	***	***	***[3]	***	***
SB Specialty Metals LLC	Liverpool, NY	***	***	***	***	***	***	***	***
Schmidewerke Gröditz GmbH	Gröditz, SN	***	***	***	***	***	***	***	***
Schmolz+Bickenbach USA, Inc.	Carol Stream, IL	***	***	***	***	***	***	***	***
Seba International Inc.	Houston, TX	***	***	***	***	***	***	***	***
Severstal Export Miami Corp	Doral, FL	***	***	***	***	***	***	***	***
Shinsho American Corporation	Novi, MI	***	***	***	***	***	***	***	***
SKC INC	Covington, GA	***	***	***	***	***	***	***	***
SSAB	Lisle, IL	***	***	***	***	***	***	***	***
Stemcor USA Inc.	New York, NY	***	***	***	***	***	***	***	***
Sturdell Industries Inc.	Rochester, NY	***	***	***[3]	***	***[3]	***	***	***
Sumitomo Corporation of Americas	New York, NY	***	***	***	***	***	***	***	***
Sunbelt Group LP	Houston, TX	***	***	***	***	***	***	***	***
Tata Steel International (Americas) Inc.	Schaumburg,, IL	***	***	***	***	***	***	***	***
The Herrick Corporation	Stockton, CA	***	***	***	***	***	***	***	***
Thyssenkrupp Materials North America Inc.	Southfield, MI	***	***	***	***	***	***	***	***
Thyssenkrupp Steel North America, Inc.	Southfield, MI	***	***	***	***	***	***	***	***
Trinity Industries, Inc.	Dallas, TX	***	***	***	***	***	***	***	***
Universal Steel America	Houston, TX	***	***	***	***	***	***	***	***
UPC Interpipe, Inc.	Houston, TX	***	***	***	***	***	***	***	***
Vestas Towers America, Inc.	Pueblo, CO	***	***	***	***	***	***	***	***
voestalpine USA Corp	Houston, TX	***	***	***	***	***	***	***	***
VR Steel LLC	Oakdale, MN	***	***	***	***	***	***[3]	***	***
Wagner Plate Works Texas LLC	Houston, TX	***	***	***	***	***	***	***	***
Xingcheng Special Steel America, Inc.	Houston, TX	***	***	***	***	***	***	***	***
Total		100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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Table IV-1—Continued
CTL plate: U.S. importers, their headquarters, and share of imports by source, 2015

Firm	Share of imports by source (percent)							
	Korea, POSCO[1]	Korea, all others[2]	South Africa	Taiwan	Turkey	Subject sources	Nonsubject sources	All sources
A.M. Castle & Co.	***	***	***	***	***	***	***[3]	***[3]
Abelardo A. Salinas Inc.	***	***	***	***	***	***	***	***
Acier Wirth Steel	***	***	***	***	***	***	***	***
AHMSA International	***	***	***	***	***	***	***	***
AIDA America Corp	***	***	***	***	***	***	***	***
Artco Group International	***	***	***	***	***	***	***	***
Berg Steel	***	***	***	***	***	***	***	***
Bestar LLC	***	***	***	***	***	***	***	***
Bluescope Steel Americas	***	***	***	***	***	***	***	***
Bohler-Uddeholm Corporation	***	***	***	***	***	***	***	***
C&F International Incorporated	***	***	***	***	***	***	***[3]	***[3]
C.V. Aceros AG	***	***	***	***	***	***	***	***
CMC	***	***	***	***	***	***	***	***
Cotia (USA) Ltd.	***	***	***	***	***	***	***	***
CPW America Co.	***	***	***	***	***	***	***	***
Curfman Steel Corporation	***	***	***	***	***	***[3]	***	***[3]
Dillinger America, Inc.	***	***	***	***	***	***	***	***
Dosco America, Inc.	***	***	***	***	***	***	***	***
Duferco Steel Inc.	***	***	***	***	***	***	***	***
Dura-Bond Pipe, LLC	***	***	***	***	***	***	***	***
Dynamic Materials Corp.	***	***	***	***	***	***	***[3]	***
Edgen Murray Corporation	***	***	***	***	***	***	***	***
EDRO	***	***	***	***	***	***[3]	***	***[3]
EEW Steel Trading, LLC	***	***	***	***	***	***	***	***[3]
Empire Resources Inc.	***	***	***	***	***	***	***	***
EVRAZ	***	***	***	***	***	***	***	***
Ferrum International Ltd	***	***	***	***	***	***	***	***[3]
GHM America Corporation	***	***	***	***	***	***	***	***
Global Metal Services, Ltd.	***	***	***	***	***	***	***	***
Great Lakes Towers, LLC	***	***	***	***	***	***	***	***
GS Global USA, Inc	***	***	***	***	***	***	***	***
Hanwa American Corp.	***	***	***	***	***	***[3]	***	***[3]

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Table IV-1—Continued
CTL plate: U.S. importers, their headquarters, and share of imports by source, 2015

Firm	Share of imports by source (percent)							
	Korea, POSCO[1]	Korea, all others[2]	South Africa	Taiwan	Turkey	Subject sources	Nonsubject sources	All sources
Hitachi Metals America, Ltd.	***	***	***	***	***	***[3]	***	***[3]
Hyundai Corporation (USA)	***	***	***	***	***	***	***	***
Industeel USA, LLC	***	***	***	***	***	***	***	***
Intsel Steel Distributors	***	***	***	***	***	***	***	***
Janco Steel Ltd.	***[3]	***	***	***	***	***[3]	***	***
JFE Shoji Trade America, Inc.	***	***	***	***	***	***	***	***
Kanematsu USA Inc.	***	***	***	***	***	***[3]	***	***[3]
Kenwal Canada Inc.	***	***	***	***	***	***	***	***
Kloeckner	***	***	***	***	***	***	***	***
Kopo International, Inc	***	***	***	***	***	***	***	***
Latrobe Specialty Metals Distribution	***	***	***	***	***	***[3]	***	***[3]
Lyman Steel Company	***	***	***	***	***	***	***	***
Macsteel International USA Corp.	***	***	***	***	***	***	***	***
Marubeni Itochu Steel Canada Inc.	***	***	***	***	***	***	***	***
Marubeni-Itochu Steel America Inc.	***	***	***	***	***	***	***	***
MC Tubular Products, Inc.	***	***	***	***	***	***[3]	***	***[3]
Metal One America Inc.	***	***	***	***	***	***	***	***
Metallia U.S.A., LLC	***	***	***	***	***	***	***	***
Mitsui & Co. (USA), Inc.	***	***	***	***	***	***	***	***
MS Global Steel, Inc.	***	***	***	***	***	***[3]	***	***[3]
MX Industrial Corporation	***	***	***	***	***	***	***	***
Nippon Steel & Sumikin Bussan Americas, Inc.	***	***	***	***	***	***	***	***
NLMK North America Plate LLC	***	***	***	***	***	***	***	***
Okaya (USA) Inc	***	***	***	***	***	***	***	***
Olbert Metal Sales Inc.	***	***	***	***	***	***	***	***
Optima Steel International, LLC	***	***	***	***	***	***	***	***
PCS Company	***	***	***	***	***	***	***	***
PlatesAhead Inc.	***	***	***	***	***	***[3]	***	***[3]
POSCO America Corporation	***	***	***	***	***	***	***	***
POSCO Daewoo America Corp.	***	***	***	***	***	***	***	***
Precision Industies Inc.	***	***	***	***	***	***	***	***
Rushmore Enterprises Inc.	***	***	***	***	***	***	***	***

Table continued on next page.

Table IV-1—Continued
CTL plate: U.S. importers, their headquarters, and share of imports by source, 2015

Firm	Share of imports by source (percent)							
	Korea, POSCO[1]	Korea, all others[2]	South Africa	Taiwan	Turkey	Subject sources	Nonsubject sources	All sources
Ryerson	***	***	***	***	***	***	***	***
Salzgitter Mannesmann International GmbH	***	***	***	***	***	***	***	***
Salzgitter Mannesmann International USA Inc.	***	***	***	***	***	***	***	***
Samsung C&T America, Inc	***	***	***	***	***	***	***	***
Samuel, Son & Co., Limited	***[3]	***	***	***	***	***[3]	***	***
SB Specialty Metals LLC	***	***	***	***	***	***	***	***
Schmidewerke Gröditz GmbH	***	***	***	***	***	***	***	***
Schmolz+Bickenbach USA, Inc.	***	***	***	***	***	***	***	***
Seba International Inc.	***	***	***	***	***	***	***	***
Severstal Export Miami Corp	***	***	***	***	***	***	***	***
Shinsho American Corporation	***	***	***	***	***	***[3]	***	***[3]
SKC INC	***	***	***	***	***	***	***	***
SSAB	***	***	***	***	***	***	***	***
Stemcor USA Inc.	***	***	***	***	***	***	***	***
Sturdell Industries Inc.	***	***	***	***	***	***[3]	***	***[3]
Sumitomo Corporation of Americas	***	***	***	***	***	***	***	***
Sunbelt Group LP	***	***	***	***	***	***	***	***
Tata Steel International (Americas) Inc.	***	***	***	***	***	***	***	***
The Herrick Corporation	***	***	***	***	***	***	***	***
Thyssenkrupp Materials North America Inc.	***	***	***	***	***	***	***	***
Thyssenkrupp Steel North America, Inc.	***	***	***	***	***	***	***	***
Trinity Industries, Inc.	***	***	***	***	***	***	***	***
Universal Steel America	***	***	***	***	***	***	***	***
UPC Interpipe, Inc.	***	***	***	***	***	***	***	***
Vestas Towers America, Inc.	***	***	***	***	***	***	***	***
voestalpine USA Corp	***	***	***	***	***	***	***	***
VR Steel LLC	***	***	***	***	***	***[3]	***	***[3]
Wagner Plate Works Texas LLC	***	***	***	***	***	***	***	***
Xingcheng Special Steel America, Inc.	***	***	***	***	***	***	***	***
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Footnotes continued on next page.

Table IV-1—Continued
CTL plate: U.S. importers, their headquarters, and share of imports by source, 2015

[1] Korea subject includes U.S. imports of CTL plate produced by POSCO and/or its affiliates in Korea, as well as imports from Korea produced/exported by non-POSCO entities, provided such imports were not subject to the existing antidumping and countervailing duty orders (*i.e.*, alloy steel plate). A portion of the importer questionnaire data for Korea (POSCO) submitted by 23 importing firms listed in this table may double-count a small share of imports also reported by ***.
[2] The data reported in the "Korea, all others" column is also included in the combined data for nonsubject sources.
[3] ***.

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

U.S. IMPORTS

U.S. imports from subject and nonsubject countries

Table IV-2 and figure IV-1 present data for U.S. imports of CTL plate. The quantity of subject imports of CTL plate increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, and was *** percent lower during January to September 2016 than during January to September 2015. As a share of the quantity of total imports, subject imports increased from *** percent in 2013 to *** percent in 2014, and further increased to *** percent in 2015 due to the drop in nonsubject imports. The quantity of subject imports accounted for *** percent during January to September 2016 as compared to *** percent during January to September 2015. The average unit values of subject imports decreased by *** percent from 2013 to 2015, and were *** percent lower during January to September 2016 than during January to September 2015.

Canada was the largest nonsubject source for U.S. imports of CTL plate in 2013 and 2014, accounting for 19.6 percent of the quantity of total U.S. imports of CTL plate in 2013, 10.5 percent in 2014, and 11.3 percent in 2015, 12.9 percent during January to September 2016, and 10.5 percent during January to September 2015. The quantity of U.S. imports from all nonsubject sources combined increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, and were *** percent lower during January to September 2016 than during January to September 2015. The average unit values of all nonsubject imports combined increased by *** percent from 2013 to 2015, and were *** percent lower during January to September 2016 than during January to September 2015.

The ratio of subject import volume to U.S. production increased from *** percent in 2013 to *** percent in 2015, but was lower at *** percent during January to September 2016 as compared to *** percent during January to September 2015.

When comparing trends in shipments and consumption of X-70 grade CTL plate to overall import trends from subject countries, shipments of X-70 by producers and importers decreased from 2013 to 2014 but increased from 2014 to 2015, while subject imports overall showed the opposite trend during these calendar years. In the interim periods, however, shipments of X-70 grade CTL plate of both producers and importers were generally higher

during January to September 2016 than during January to September 2015, as were imports of all types of CTL plate from subject countries.[5]

Table IV-2
CTL plate: U.S. imports, by source, 2013-15, January to September 2015, and January to September 2016

Item	Calendar year			January to September	
	2013	2014	2015	2015	2016
	Quantity (short tons)				
U.S. imports from.--					
Austria	50,292	52,031	13,305	11,883	14,564
Belgium	7,873	32,400	21,023	18,544	17,281
Brazil	22,152	137,460	46,183	34,348	8,428
China	29,221	47,992	72,239	32,943	37,718
France	87,727	111,176	217,558	199,409	104,263
Germany	138,540	72,631	234,810	205,366	142,329
Italy	46,508	97,326	59,455	55,472	28,915
Japan	48,325	76,002	77,500	71,632	31,959
Korea (subject)	***	***	***	***	***
South Africa	5,174	38,252	21,495	15,401	93
Taiwan	34,302	58,472	35,482	30,610	10,600
Turkey	20,079	116,494	23,281	15,070	35,575
Subject sources	***	***	***	***	***
Canada	175,743	185,888	166,604	128,464	126,234
Korea (nonsubject)	***	***	***	***	***
Mexico	55,966	83,862	49,516	36,105	40,682
All other sources[2]	97,054	354,289	110,617	89,938	49,243
Nonsubject sources	***	***	***	***	***
Total U.S. imports	897,417	1,773,391	1,479,800	1,226,867	979,304

Table continued on next page.

[5] Import sources of X-70 grade CTL plate to the United States were primarily France, Germany, and Korea. POSCO contends that grade X-70 CTL plate accounted for a large and increasing share of subject imports, including the increase in overall subject imports between 2014 and 2015 and between the interim periods, because the domestic industry was not able to supply X-70 grade CTL plate. Petitioners, however, contend that this claim is incorrect because U.S. producers do produce and ship X-70 grade CTL plate. In addition, French and German respondents note that while subject imports of X-70 grade CTL plate *** from 2013 to 2015, domestic shipments of X-70 grade CTL plate *** over the same period, causing the U.S. producers' share of the X-70 grade CTL plate market to substantially increase. French and German respondents' posthearing brief, p. 3; POSCO's posthearing brief, pp. 1-2; Nucor's posthearing brief, p. 7.

Table IV-2—Continued
CTL plate: U.S. imports, by source, 2013-15, January to September 2015, and January to September 2016

Item	Calendar year			January to September	
	2013	2014	2015	2015	2016
	Value (1,000 dollars)				
U.S. imports from.--					
Austria	53,016	51,434	15,353	13,569	13,983
Belgium	8,676	32,544	20,921	18,239	18,434
Brazil	14,890	95,565	28,386	23,134	3,567
China	50,150	64,801	74,601	48,600	33,370
France	85,196	108,137	167,625	151,914	72,426
Germany	132,899	97,294	194,609	169,151	123,619
Italy	34,207	71,988	40,484	38,055	19,507
Japan	49,909	61,615	57,964	53,748	21,497
Korea (subject)	***	***	***	***	***
South Africa	3,398	23,436	10,626	8,275	39
Taiwan	23,061	41,149	22,986	20,586	5,232
Turkey	12,432	73,789	13,425	10,083	14,789
Subject sources	***	***	***	***	***
Canada	147,708	161,584	113,848	90,253	75,703
Korea (nonsubject)	***	***	***	***	***
Mexico	34,706	58,271	24,985	19,086	17,886
All other sources[2]	95,956	301,008	99,029	82,185	44,007
Nonsubject sources	***	***	***	***	***
Total U.S. imports	799,507	1,462,312	1,114,132	944,466	668,151

Table continued on next page.

Table IV-2—Continued
CTL plate: U.S. imports, by source, 2013-15, January to September 2015, and January to September 2016

Item	Calendar year			January to September	
	2013	2014	2015	2015	2016
	Unit value (dollars per short ton)				
U.S. imports from.--					
Austria	1,054	989	1,154	1,142	960
Belgium	1,102	1,004	995	984	1,067
Brazil	672	695	615	674	423
China	1,716	1,350	1,033	1,475	885
France	971	973	770	762	695
Germany	959	1,340	829	824	869
Italy	735	740	681	686	675
Japan	1,033	811	748	750	673
Korea (subject)	***	***	***	***	***
South Africa	657	613	494	537	414
Taiwan	672	704	648	673	494
Turkey	619	633	577	669	416
Subject sources	***	***	***	***	***
Canada	840	869	683	703	600
Korea (nonsubject)	***	***	***	***	***
Mexico	620	695	505	529	440
All other sources[2]	989	850	895	914	894
Nonsubject sources	***	***	***	***	***
Total U.S. imports	891	825	753	770	682

Table continued on next page.

Table IV-2—Continued
CTL plate: U.S. imports, by source, 2013-15, January to September 2015, and January to September 2016

Item	Calendar year			January to September	
	2013	2014	2015	2015	2016
	Share of quantity (percent)				
U.S. imports from.--					
Austria	5.6	2.9	0.9	1.0	1.5
Belgium	0.9	1.8	1.4	1.5	1.8
Brazil	2.5	7.8	3.1	2.8	0.9
China	3.3	2.7	4.9	2.7	3.9
France	9.8	6.3	14.7	16.3	10.6
Germany	15.4	4.1	15.9	16.7	14.5
Italy	5.2	5.5	4.0	4.5	3.0
Japan	5.4	4.3	5.2	5.8	3.3
Korea (subject)	***	***	***	***	***
South Africa	0.6	2.2	1.5	1.3	0.0
Taiwan	3.8	3.3	2.4	2.5	1.1
Turkey	2.2	6.6	1.6	1.2	3.6
Subject sources	***	***	***	***	***
Canada	19.6	10.5	11.3	10.5	12.9
Korea (nonsubject)	***	***	***	***	***
Mexico	6.2	4.7	3.3	2.9	4.2
All other sources[2]	10.8	20.0	7.5	7.3	5.0
Nonsubject sources	***	***	***	***	***
Total U.S. imports	100.0	100.0	100.0	100.0	100.0

Table continued on next page.

Table IV-2—Continued
CTL plate: U.S. imports, by source, 2013-15, January to September 2015, and January to September 2016

Item	Calendar year			January to September	
	2013	2014	2015	2015	2016
	Share of value (percent)				
U.S. imports from.--					
Austria	6.6	3.5	1.4	1.4	2.1
Belgium	1.1	2.2	1.9	1.9	2.8
Brazil	1.9	6.5	2.5	2.4	0.5
China	6.3	4.4	6.7	5.1	5.0
France	10.7	7.4	15.0	16.1	10.8
Germany	16.6	6.7	17.5	17.9	18.5
Italy	4.3	4.9	3.6	4.0	2.9
Japan	6.2	4.2	5.2	5.7	3.2
Korea (subject)	***	***	***	***	***
South Africa	0.4	1.6	1.0	0.9	0.0
Taiwan	2.9	2.8	2.1	2.2	0.8
Turkey	1.6	5.0	1.2	1.1	2.2
Subject sources	***	***	***	***	***
Canada	18.5	11.0	10.2	9.6	11.3
Korea (nonsubject)	***	***	***	***	***
Mexico	4.3	4.0	2.2	2.0	2.7
All other sources[2]	12.0	20.6	8.9	8.7	6.6
Nonsubject sources	***	***	***	***	***
Total U.S. imports	100.0	100.0	100.0	100.0	100.0

Table continued on next page.

Table IV-2—Continued
CTL plate: U.S. imports, by source, 2013-15, January to September 2015, and January to September 2016

Item	Calendar year			January to September	
	2013	2014	2015	2015	2016
	Ratio to U.S. production				
U.S. imports from.--					
Austria	0.6	0.6	0.2	0.2	0.3
Belgium	0.1	0.4	0.3	0.3	0.3
Brazil	0.3	1.5	0.6	0.6	0.2
China	0.3	0.5	1.0	0.6	0.7
France	1.0	1.2	2.9	3.3	1.9
Germany	1.6	0.8	3.1	3.4	2.6
Italy	0.5	1.1	0.8	0.9	0.5
Japan	0.6	0.8	1.0	1.2	0.6
Korea (subject)	***	***	***	***	***
South Africa	0.1	0.4	0.3	0.3	0.0
Taiwan	0.4	0.6	0.5	0.5	0.2
Turkey	0.2	1.3	0.3	0.3	0.6
Subject sources	***	***	***	***	***
Canada	2.1	2.0	2.2	2.1	2.3
Korea (nonsubject)	***	***	***	***	***
Mexico	0.7	0.9	0.7	0.6	0.7
All other sources[2]	1.1	3.8	1.5	1.5	0.9
Nonsubject sources	***	***	***	***	***
Total U.S. imports	10.5	19.2	19.7	20.5	17.7

[1] Less than 0.05 percent.
[2] The largest of these sources in 2015 were Finland and Sweden.

Source: Official U.S. import statistics and proprietary Customs records using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.1190, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed November 8, 2016, with adjustments based on data submitted in response to Commission questionnaires.

Figure IV-1
CTL plate: U.S. import quantities and average unit values, 2013-15, January to September 2015, and January to September 2016

* * * * * * *

Historical U.S. imports

U.S. imports of CTL plate for the period from 2007 to 2015 are presented in table IV-3 and figure IV-2. Historically, official U.S. import statistics show that U.S. imports of CTL plate from all sources fell from 2007 to 2009 as the financial crisis and recession spread in the United States, and remained at low levels in 2010. Total U.S. imports recovered in 2011 and 2012, fell sharply in 2013, and then resumed their growth in 2014. Imports of CTL plate from the 12 countries subject to these investigations followed the same general trend as total U.S. imports from all countries from 2007 to 2014. However, from 2014 to 2015, total U.S. imports and U.S. imports from nonsubject countries declined, whereas U.S. imports from the subject countries remained relatively constant.

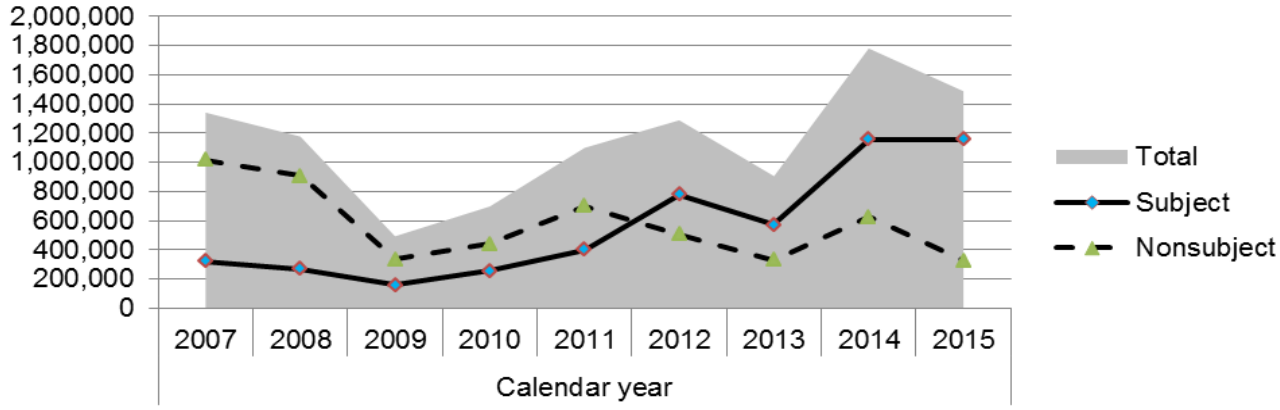
Table IV-3
CTL plate: Historical U.S. imports, by source, 2007-15

Item	Calendar year								
	2007	2008	2009	2010	2011	2012	2013	2014	2015
U.S. imports from.--									
Austria	28,820	23,143	22,314	25,637	56,220	53,141	50,292	52,031	13,305
Belgium	25,422	14,182	8,094	4,996	4,632	9,308	7,873	32,400	21,023
Brazil	9,974	13,826	15,162	41,680	43,945	125,581	22,152	137,460	46,183
China	30,977	41,187	2,483	8,986	15,130	15,071	29,429	47,992	72,239
France	20,878	19,069	13,945	25,712	28,413	47,812	92,858	116,295	222,494
Germany	52,491	45,372	24,680	108,510	81,385	96,537	138,540	73,146	235,445
Italy	3,107	100	4,580	595	983	46,758	46,508	97,326	59,455
Japan	38,502	48,409	22,531	19,336	27,015	60,044	48,962	77,333	78,523
Korea	85,469	46,973	15,257	11,201	76,211	208,461	78,459	309,115	330,732
South Africa	24,807	13,904	10,805	7,759	19,017	16,631	5,174	38,252	21,495
Taiwan	790	4,012	2,129	201	11,986	38,634	34,302	58,472	35,482
Turkey	1,906	205	18,281	791	36,856	62,218	20,079	116,494	23,281
All subject sources	323,145	270,381	160,262	255,404	401,793	780,196	574,630	1,156,317	1,159,657
Canada	360,297	381,406	196,364	246,773	274,590	245,129	178,573	187,079	168,550
Mexico	2,574	1,173	7,775	19,685	51,273	25,204	55,966	83,862	49,516
All other sources	658,402	526,193	137,920	196,567	424,049	263,794	97,054	354,289	110,617
Nonsubject Sources	1,018,699	907,598	334,283	443,340	698,639	508,923	331,593	625,230	328,683
Total U.S. imports	1,341,844	1,177,980	494,545	698,745	1,100,432	1,289,119	906,223	1,781,547	1,488,340

Note.--Prior to 2007 some statistical reporting numbers for CTL plate did not exist. No adjustment has been made with respect to imports from Korea.

Source: Official U.S. import statistics using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.1190, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed May 5, 2016 and October 13, 2016. Additionally, HTS statistical reporting number 7225.40.1190 was replaced by 7224.40.1180 in 2016 and are therefore not listed in Commerce's scope in this proceeding.

Figure IV-2
CTL plate: Historical U.S. import volumes, 2007-15



Source: Official U.S. import statistics using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1115, 7225.40.1180, 7225.40.1190, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed May 5, 2016 and October 13, 2016.

NEGLIGIBILITY

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.[6] Negligible imports are generally defined in the Tariff Act of 1930, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.[7] In the case of countervailing duty investigations involving developing countries, the negligibility limits are 4 percent and 9 percent rather than 3 percent and 7 percent.[8]

The quantity of U.S. imports in the 12-month period preceding the filing of the petitions (April 2015 through March 2016) and the share of quantity of total U.S. imports for which each accounted are presented in table IV-4.[9]

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

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

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

[9] Data regarding the quantity of U.S. imports of tool steel in the 12-month period preceding the filing of the petitions (April 2015 through March 2016) and the share of quantity of total U.S. imports of tool steel for which each accounted are presented in app. G.

Table IV-4
CTL plate: U.S. imports in the twelve month period preceding the filing of the petition, by source, April 2015 through March 2016

Item	April 2015 through March 2016					
	Adjusted official U.S. imports[1]		Adjusted official U.S. imports excluding merchandise subject to related orders on Korea[2]		Adjusted official U.S. imports excluding merchandise subject to related orders on China and Korea[3]	
	Quantity (short tons)	Share of quantity (percent)	Quantity (short tons)	Share of quantity (percent)	Quantity (short tons)	Share of quantity (percent)
U.S. imports from.--						
Austria	13,110	1.0	13,110	1.1	13,110	1.1
Belgium	14,272	1.1	14,272	1.1	14,272	1.1
Brazil	31,478	2.5	31,478	2.5	31,478	2.5
China	87,395	6.9	87,395	7.0	87,368	7.0
France	167,466	13.3	167,466	13.4	167,466	13.4
Germany	204,683	16.3	204,683	16.4	204,683	16.4
Italy	38,021	3.02	38,021	3.05	38,021	3.05
Japan	61,041	4.8	61,041	4.9	61,041	4.9
Korea (subject)	***	***	***	***	***	***
South Africa	19,375	1.5	19,375	1.6	19,375	1.6
Taiwan	20,032	1.6	20,032	1.6	20,032	1.6
Turkey	15,851	1.3	15,851	1.3	15,851	1.3
Subject sources	***	***	***	***	***	***
Of which individually negligible	114,117	9.1	114,117	9.2	114,117	9.2
Canada	179,224	14.2	179,224	14.4	179,224	14.4
Korea (nonsubject)	***	***	***	***	***	***
Mexico	64,674	5.1	64,674	5.2	64,674	5.2
All other sources	65,788	5.2	65,788	5.3	65,788	5.3
Nonsubject sources	***	***	***	***	***	***
Total U.S. imports	1,258,849	100.0	1,245,236	100.0	1,245,209	100.0

[1] The first calculation is based on the import dataset presented in Table IV-2, where imports from Korea subject to the related order are classified as nonsubject imports.
[2] The second calculation excludes imports from Korea subject to the related orders based on whether initial antidumping and/or countervailing duty deposits were gathered.
[3] The third calculation excludes imports from China and Korea subject to the antidumping and/or countervailing duty orders based on whether initial antidumping and/or countervailing duty deposits were gathered.

Source: Official U.S. import statistics and proprietary Customs records using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.1190, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed November 8, 2016, with adjustments based on data submitted in response to Commission questionnaires.

CRITICAL CIRCUMSTANCES

Commerce issued its preliminary determinations concerning critical circumstances on September 7, 2016 (see table I-2 presented in Part I of this report) with regard to imports from of CTL plate from Austria, Belgium, Brazil, Korea, Taiwan, and Turkey.[10] Commerce issued its preliminary determination concerning critical circumstances on November 14, 2016 with regard to imports from of CTL plate from Italy.[11] Commerce issued its final affirmative determinations concerning critical circumstances on November 30, 2016 with regard to imports from Brazil and Turkey.[12] Commerce's final determinations concerning critical circumstances with regard to imports from Austria, Belgium, Italy, Korea, and Taiwan are scheduled to be issued on March 20, 2016.

In this proceeding, if both Commerce and the Commission make affirmative final critical circumstances determinations, certain subject imports may be subject to antidumping and countervailing duties retroactive by 90 days from September 14, 2016 (Korea), the effective date of Commerce's preliminary countervailing duty determination, as well as September 22, 2016 (Brazil and Turkey) and November 14, 2016 (Austria, Belgium, Italy, Korea, and Taiwan), the effective dates of Commerce's preliminary antidumping duty determinations. As discussed below, Commerce made critical circumstances determinations with respect to seven countries: the countervailing duty investigation on CTL plate from Korea (no companies), and antidumping duty investigation on CTL plate from Austria (certain companies), Belgium (certain companies), Brazil (all companies), Italy (certain companies), Korea (no companies), Taiwan (certain companies) and Turkey (all companies).

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[10] *Certain Carbon and Alloy Steel Cut-to-Length Plate From Austria, Belgium, Brazil, the Republic of Korea, Taiwan, and Turkey; Antidumping and Countervailing Duty Investigations: Preliminary Determinations of Critical Circumstances*, 81 FR 61666, September 7, 2016, referenced in app. A. When petitioners file timely allegations of critical circumstances, Commerce examines whether there is a reasonable basis to believe or suspect that (1) either there is a history of dumping and material injury by reason of dumped imports in the United States or elsewhere of the subject merchandise, or the person by whom, or for whose account, the merchandise was imported knew or should have known that the exporter was selling the subject merchandise at LTFV and that there was likely to be material injury by reason of such sales; and (2) there have been massive imports of the subject merchandise over a relatively short period.

[11] *Certain Carbon and Alloy Steel Cut-To-Length Plate From Italy: Preliminary Determination of Sales at Less Than Fair Value, Affirmative Determination of Critical Circumstances, and Postponement of Final Determination*, 81 FR 79423, November 14, 2016.

[12] *Certain Carbon and Alloy Steel Cut-to-Length Plate From Brazil, South Africa, and the Republic of Turkey: Affirmative Final Determinations of Sales at Less Than Fair Value and Affirmative Final Determinations of Critical Circumstances for Brazil and the Republic of Turkey*, 81 FR 87544, December 5, 2016.

Austria (antidumping duty)

In its preliminary antidumping critical circumstances determination concerning Austria, Commerce determined that critical circumstances exist with regard to imports of CTL plate from Austrian producer voestalpine and related entities. Table IV-5 and figure IV-3 present monthly imports of CTL plate by U.S. importers from voestalpine for the six month periods before and after the filing of the petition on April 8, 2016 (October 2015 through March 2016 and April 2016 through September 2016). These data show that U.S. imports from firms receiving affirmative preliminary antidumping duty critical circumstances determinations during the six-month period for which data are available after the filing of the petition were *** percent higher than during the six-month period prior to the filing of the petition.

Of the 12 firms that reported U.S. imports of CTL plate from Austria, five firms indicated that inventories of the imported merchandise were held in the United States. Reported U.S. importers' inventories of CTL plate imported from Austria amounted to *** short tons at September 2015 and *** short tons at September 2016. These data, however, are overstated for the purposes of critical circumstances considerations because they include inventories of imports from other Austrian producers for which Commerce made a negative finding.

Table IV-5
CTL plate: Imports by U.S. importers from Austrian producer voestalpine, October 2015–March 2016 and April 2016–September 2016

* * * * * * *

Figure IV-3
CTL plate: Imports by U.S. importers from Austrian producer voestalpine, October 2015–September 2016

* * * * * * *

Belgium (antidumping duty)

In its preliminary antidumping critical circumstances determination concerning Belgium, Commerce determined that critical circumstances exist with regard to imports of CTL plate from Belgian producers Industeel (Belgium) and NLMK Clabecq. Table IV-6 and figure IV-4 present monthly imports of CTL plate by U.S. importers from Industeel (Belgium) and NLMK Clabecq for the six month periods before and after the filing of the petition on April 8, 2016 (October 2015 through March 2016 and April 2016 through September 2016). These data show that U.S. imports from firms receiving affirmative preliminary antidumping duty critical circumstances determinations during the six-month period for which data are available after the filing of the petition were *** percent higher than during the six-month period prior to the filing of the petition.

Of the nine firms that reported U.S. imports of CTL plate from Industeel (Belgium) and NLMK Clabecq, four firms indicated that inventories of the imported merchandise were held in the United States. Reported U.S. importers' inventories of CTL plate imported from Industeel (Belgium) and NLMK Clabecq amounted to *** short tons at September 2015 and *** short tons at September 2016.

Table IV-6
CTL plate: Imports by U.S. importers from Belgian producers Industeel (Belgium) and NLMK Clabecq, October 2015–March 2016 and April 2016–September 2016

* * * * * * *

Figure IV-4
CTL plate: Imports by U.S. importers from Belgian producers Industeel (Belgium) and NLMK Clabecq, October 2015–September 2016

* * * * * * *

Brazil (antidumping duty)

In its preliminary antidumping critical circumstances determination concerning Brazil, Commerce determined that critical circumstances exist with regard to imports of CTL plate from all producers in Brazil. In its final critical circumstances determination concerning Brazil, Commerce determined that critical circumstances continue to exist with regard to imports of CTL plate from all producers in Brazil. Table IV-7 and figure IV-5 present monthly imports of CTL plate by U.S. importers from Brazil for the six month periods before and after the filing of the petition on April 8, 2016 (October 2015 through March 2016 and April 2016 through September 2016). These data show that U.S. imports from firms receiving affirmative preliminary antidumping duty critical circumstances determinations during the six-month period after the filing of the petition were 46.3 percent lower than during the six-month period prior to the filing of the petition.

Of the 17 firms that reported U.S. imports of CTL plate from Brazil, nine firms indicated that inventories of the imported merchandise were held in the United States. Reported U.S. importers' inventories of CTL plate imported from Brazil amounted to *** short tons at September 2015 and *** short tons at September 2016.

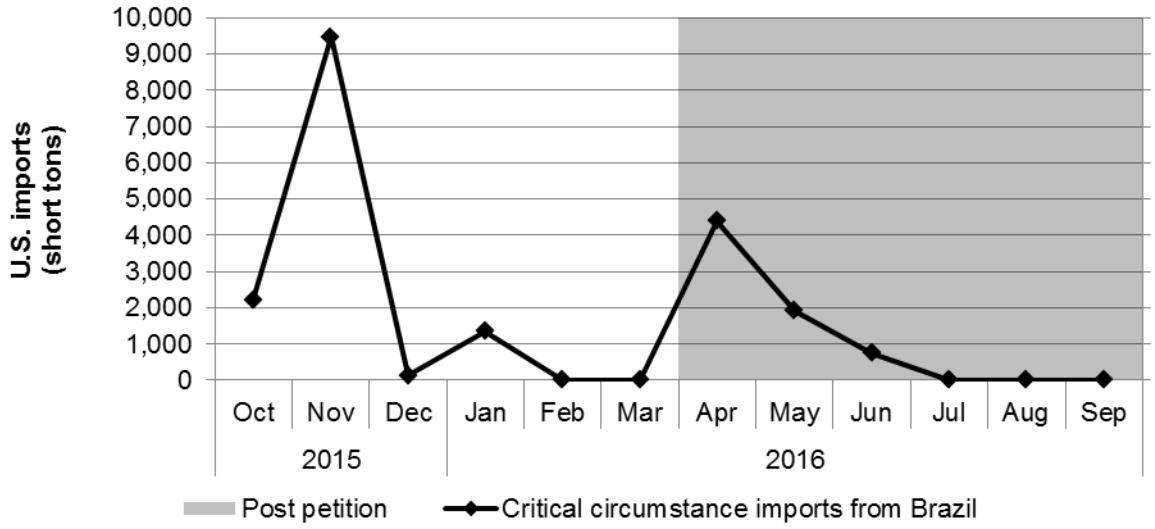
Table IV-7
CTL plate: Imports by U.S. importers from all producers/exporters in Brazil, October 2015–March 2016 and April 2016–September 2016

Period	Actual monthly quantity (short tons)	Outwardly cumulative subtotals (short tons)	Outwardly cumulative 2-, 4-, 6-, 8-, 10- and 12-month totals (short tons)[1]	Mirror shares (percent)[2]	Mirror shares (enumeration)[3]
2015.--					
October	2,225	13,184	20,263	65.1	F
November	9,478	10,959	18,038	60.8	E
December	132	1,482	8,549	17.3	D
2016.--					
January	1,349	1,349	8,416	16.0	C
February	0	0	6,323	0.0	B
March	0	0	4,398	0.0	A
Petition file date: April 8, 2016					
April	4,398	4,398	4,398	100.0	A
May	1,926	6,323	6,323	100.0	B
June	744	7,067	8,416	84.0	C
July	0	7,067	8,549	82.7	D
August	11	7,078	18,038	39.2	E
September	0	7,078	20,263	34.9	F

[1] The totals represent the total imports summing both sides of the petition file date. For example, the total reported for the April line represents April 2016 and March 2016 data; whereas the total reported for the May line represents 4 months of data for the February 2016 through May 2016 period.
[2] Mirror shares represent data in the second column divided by the data in third column.
[3] The enumerations indicate which two shares should sum to 100 percent (*e.g.*, the two lines labeled A should sum to 100 percent, the two lines labeled B should sum to 100 percent, et cetera).

Source: Official U.S. import statistics using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.1190, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed on November 7, 2016.

Figure IV-5
CTL plate: Imports by U.S. importers from all producers/exporters in Brazil, October 2015–September 2016



Source: Official U.S. import statistics using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.1190, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed November 3, 2016.

Italy (antidumping duty)

In its preliminary antidumping critical circumstances determination concerning Italy, Commerce determined that critical circumstances exist with regard to imports of CTL plate from Marcegaglia, NLMK Verona, and Officine. Table IV-8 and figure IV-6 present monthly imports of CTL plate by U.S. importers from Marcegaglia, NLMK Verona, and Officina for the six month periods before and after the filing of the petition on April 8, 2016 (October 2015 through March 2016 and April 2016 through September 2016). These data show that U.S. imports from firms receiving affirmative preliminary antidumping duty critical circumstances determinations during the six-month period for which data are available after the filing of the petition were *** percent higher than during the six-month period prior to the filing of the petition.

Of the 12 firms that reported U.S. imports of CTL plate from Italy, seven indicated that inventories of the imported merchandise were held in the United States. Reported U.S. importers' inventories of CTL plate imported from Italy amounted to *** short tons at September 2015 and *** short tons at September 2016. These data, however, are overstated for the purposes of critical circumstances considerations because they include inventories of other Italian producers for which Commerce made a negative finding.

Table IV-8
CTL plate: Imports by U.S. importers from Marcegaglia, NLMK Verona, and Officine, October 2015–March 2016 and April 2016–September 2016

* * * * * * *

Figure IV-6
CTL plate: Imports by U.S. importers from Marcegaglia, NLMK Verona, and Officine, October 2015–September 2016

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Korea (antidumping duty and countervailing duty)

In its preliminary antidumping critical circumstances determination concerning Korea, Commerce determined that critical circumstances do not exist with regard to imports of CTL plate from POSCO/POSCO Daewoo Corporation and all other producers/exporters in Korea. However, because of the abbreviated schedule for this proceeding, Staff is providing analysis with respect to imports from Korea. Table IV-9 and figure IV-7 present monthly imports of CTL plate by U.S. importers from POSCO that are not subject to any affirmative preliminary critical circumstances findings at Commerce for the six month periods before and after the filing of the petition on April 8, 2016 (October 2015 through March 2016 and April 2016 through September 2016). These data show that U.S. imports from POSCO during the six-month period for which data are available after the filing of the petition were *** percent higher than during the six-month period prior to the filing of the petition.

Of the 23 firms that reported U.S. imports of CTL plate from POSCO, nine indicated that inventories of the imported merchandise were held in the United States. Reported U.S. importers' inventories of CTL plate imported from Korea amounted to *** short tons at September 2015 and *** short tons at September 2016.

Table IV-9
CTL plate: Imports by U.S. importers from POSCO but not subject to any affirmative preliminary critical circumstances findings by Commerce, October 2015–March 2016 and April 2016–September 2016

* * * * * * *

Figure IV-7
CTL plate: Imports by U.S. importers from POSCO but not subject to any affirmative preliminary critical circumstances findings at Commerce, October 2015–September 2016

* * * * * * *

As explained above, in its preliminary antidumping critical circumstances determination concerning Korea, Commerce determined that critical circumstances do not exist with regard to imports of CTL plate from POSCO/POSCO Daewoo Corporation and all other producers/exporters in Korea. However, because of the abbreviated schedule for this proceeding, Staff is providing analysis with respect to U.S. imports from firms other than POSCO

in the Korea subject category that are not subject to any affirmative preliminary critical circumstances findings at Commerce. Table IV-10 and figure IV-8 present monthly imports of CTL plate by U.S. importers from firms other than POSCO in the Korea subject category, but not subject to any affirmative preliminary critical circumstances findings at Commerce, for the six month periods before and after the filing of the petition on April 8, 2016 (October 2015 through March 2016 and April 2016 through September 2016). These data show that U.S. imports from firms receiving affirmative preliminary antidumping duty critical circumstances determinations during the six-month period for which data are available after the filing of the petition were *** percent lower than during the six-month period prior to the filing of the petition.

Of the five firms that reported U.S. imports of CTL plate from firms other than POSCO in the Korea subject category, but are not subject to any affirmative preliminary critical circumstances findings at Commerce, no firm indicated that inventories of the imported merchandise were held in the United States.

Table IV-10
CTL plate: Imports by U.S. importers from firms other than POSCO in the Korea subject category, but not subject to any affirmative preliminary critical circumstances findings at Commerce, October 2015–March 2016 and April 2016–September 2016

* * * * * * *

Figure IV-8
CTL plate: Imports by U.S. importers from firms other than POSCO in the Korea subject category, but not subject to any affirmative preliminary critical circumstances findings at Commerce, October 2015–September 2016

* * * * * * *

Taiwan (antidumping duty)

In its preliminary antidumping critical circumstances determination concerning Taiwan, Commerce determined that critical circumstances exist with regard to imports of CTL plate from CSC and all other producers/exporters in Taiwan except for Shang Chen. Table IV-11 and figure IV-9 present monthly imports of CTL plate by U.S. importers from CSC and all other producers/exporters in Taiwan for the six-month periods before and after the filing of the petition on April 8, 2016 (October 2015 through March 2016 and April 2016 through September 2016). These data show that U.S. imports from firms receiving affirmative preliminary antidumping duty critical circumstances determinations during the six-month period for which data are available after the filing of the petition were *** percent lower than during the six-month period prior to the filing of the petition.

Of the 15 firms that reported U.S. imports of CTL plate from CSC and all other producers/exporters in Taiwan, two firms indicated that inventories of the imported merchandise were held in the United States. Reported U.S. importers' inventories of CTL plate imported from CSC and all other producers/exporters in Taiwan amounted to *** short tons at September 2015 and *** short tons at September 2016. These data, however, are overstated

for the purposes of critical circumstances considerations because they include inventories of Shang Chen for which Commerce made a negative finding.

Table IV-11
CTL plate: Imports by U.S. importers from CSC and all other producers/exporters in Taiwan other than Shang Chen, October 2015–March 2016 and April 2016–September 2016

* * * * * * *

Figure IV-9
CTL plate: Imports by U.S. importers from CSC and all other producers/exporters in Taiwan other than Shang Chen, October 2015–September 2016

* * * * * * *

Turkey (antidumping duty)

In its preliminary antidumping critical circumstances determination concerning Turkey, Commerce determined that critical circumstances exist with regard to imports of CTL plate from all producers in Turkey. In its final antidumping critical circumstances determination concerning Turkey, Commerce determined that critical circumstances continue to exist with regard to imports of CTL plate from all producers in Turkey. Table IV-12 and figure IV-10 present monthly imports of CTL plate by U.S. importers from Turkey for the six-month periods before and after the filing of the petition on April 8, 2016 (October 2015 through March 2016 and April 2016 through September 2016). These data show that U.S. imports from firms receiving affirmative preliminary antidumping duty critical circumstances determinations during the six-month period after the filing of the petition were 103.9 percent higher than during the six-month period prior to the filing of the petition.

Of the 14 firms that reported U.S. imports of CTL plate from Turkey, three firms indicated that inventories of the imported merchandise were held in the United States. Reported U.S. importers' inventories of CTL plate imported from Turkey amounted to *** short tons at September 2015 and *** short tons at September 2016.

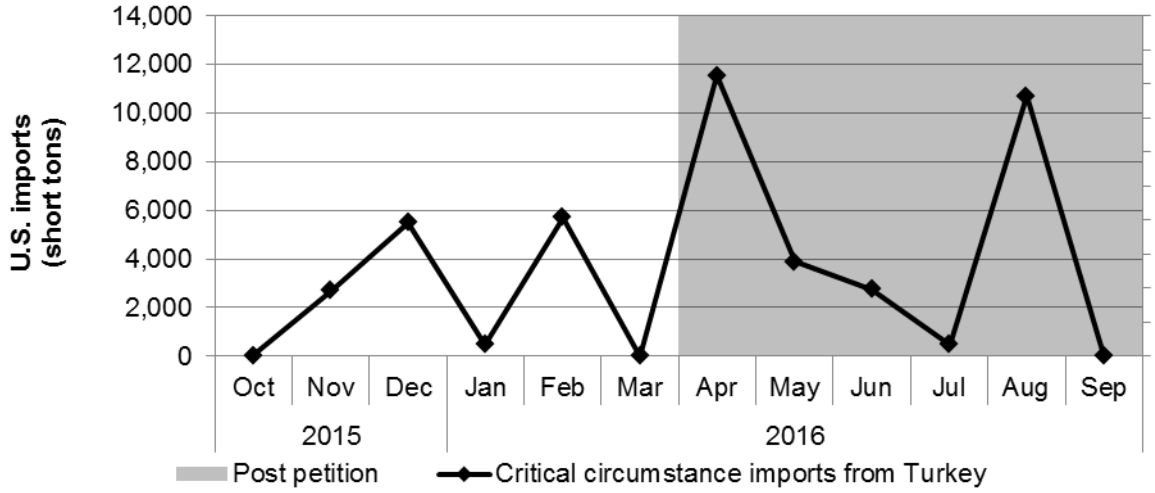
Table IV-12
CTL plate: Imports by U.S. importers from all producers/exporters in Turkey, October 2015–March 2016 and April 2016–September 2016

Period	Actual monthly quantity (short tons)	Outwardly cumulative subtotals (short tons)	Outwardly cumulative 2-, 4-, 6-, 8-, 10- and 12-month totals (short tons)[1]	Mirror shares (percent)[2]	Mirror shares (enumeration)[3]
2015.--					
October	22	14,406	43,786	32.9	F
November	2,702	14,385	43,736	32.9	E
December	5,488	11,683	30,336	38.5	D
2016.--					
January	490	6,195	24,377	25.4	C
February	5,705	5,705	21,144	27.0	B
March	0	0	11,546	0.0	A
Petition file date: April 8, 2016					
April	11,546	11,546	11,546	100.0	A
May	3,893	15,439	21,144	73.0	B
June	2,743	18,182	24,377	74.6	C
July	472	18,653	30,336	61.5	D
August	10,698	29,351	43,736	67.1	E
September	28	29,379	43,786	67.1	F

[1] The totals represent the total imports summing both sides of the petition file date. For example, the total reported for the April line represents April 2016 and March 2016 data; whereas the total reported for the May line represents 4 months of data for the February 2016 through May 2016 period.
[2] Mirror shares represent data in the second column divided by the data in third column.
[3] The enumerations indicate which two shares should sum to 100 percent (*e.g.*, the two lines labeled A should sum to 100 percent, the two lines labeled B should sum to 100 percent, et cetera).

Source: Official U.S. import statistics using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.1190, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed November 3, 2016.

Figure IV-10
CTL plate: Imports by U.S. importers from all producers/exporters in Turkey, October 2015–September 2016



Source: Official U.S. import statistics using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.1190, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed November 3, 2016.

CUMULATION CONSIDERATIONS

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

Fungibility

Shipments of CTL plate, by type

Three U.S. producers (ArcelorMittal USA, JSW, and SSAB) reported production and sales of X-70 CTL plate for U.S. consumption during 2015. Domestic producer *** noted that, although it does produce X-70 CTL plate in the United States, it *** in 2015. Rather, ***.[13] Nucor noted that, "***."[14]

[13] ***. ***.

[14] ***.

Three U.S. importers (Berg Steel Pipe Corp. ("Berg"), ***) reported U.S. shipments of U.S. imports of X-70 during 2015. Berg reported U.S. imports of X-70 CTL plate from ***,[15] and *** reported U.S. shipments of U.S. imports of X-70 CTL plate from *** for internal consumption in the production of pipe. *** reported that its U.S. imports of X-70 CTL plate from *** were commercially shipped within the United States to *** for its internal consumption.

Table IV-13 presents data for U.S. producers' and U.S. importers' commercial U.S. shipments of X-70 grade CTL plate in 2015. The three U.S. producers reported (***) short tons of shipments of X-70 steel CTL plate, representing *** percent of total U.S. producers' U.S. shipments in 2015. In 2015, there were *** short tons of U.S. shipments of imports of X-70 steel CTL plate from subject countries (***), accounting for *** percent of U.S. shipments of U.S. imports.

Table IV-13
CTL plate: U.S. producers' and U.S. importers shipments of X-70 plate, 2013-15, January to September 2015, and January to September 2016

* * * * * * *

Three U.S. producers (ArcelorMittal USA, Niagara, and Universal) reported production and sales of tool steel CTL plate for U.S. consumption during 2015.[16] [17] Fifteen U.S. importers reported U.S. imports of tool steel CTL plate during 2015. The three largest U.S. importers of tool steel CTL plate include ***. ***.

Table IV-14 presents data for U.S. producers' and U.S. importers' commercial U.S. shipments of tool steel CTL plate in the 2013-15 period. The three U.S. producers reported (***) short tons of U.S. shipments of tool steel CTL plate, representing *** percent of U.S. producers' U.S. shipments in 2015. In 2015, there were *** short tons of U.S. shipments of imports of tool steel CTL plate from subject countries (***), accounting for *** percent of U.S. shipments of U.S. imports.

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[15] Ninety-six percent of Berg's reported imports of CTL plate consisted of X-70 grade CTL plate customized for specific pipeline purposes and *** of the X-70 grade CTL plate imported into the United States from France and Germany during 2015 and January to September 2016 was sold to Berg. Hearing transcript, p. 162 (Riemer); German respondents' posthearing brief, p. 3.

[16] Tool steel is defined as alloy steels which contain the following combinations of elements in the quantity by weight respectively indicated: (i) more than 1.2 percent carbon and more than 10.5 percent chromium; or (ii) not less than 0.3 percent carbon and 1.25 percent or more but less than 10.5 percent chromium; or (iii) not less than 0.85 percent carbon and 1 percent to 1.8 percent, inclusive, manganese; or (iv) 0.9 percent to 1.2 percent, inclusive, chromium and 0.9 percent to 1.4 percent, inclusive, molybdenum; or (v) not less than 0.5 percent carbon and not less than 3.5 percent molybdenum, or (vi) not less than 0.5 percent carbon and not less than 5.5 percent tungsten.

[17] Niagara noted that it is a low volume steel producer that produces sheets and plates of tool steel, high speed steel, stainless steel, and other highly alloyed products.

Table IV-14
CTL plate: U.S. producers' and U.S. importers shipments of tool steel, 2013-15, January to September 2015, and January to September 2016

* * * * * * *

Three U.S. producers (Niagara, Nucor, and Universal) reported production and sales of high speed steel CTL plate for U.S. consumption during 2015.[18] U.S. producers' shipments of high speed steel CTL plate accounted for *** percent of total shipments during 2015. Four U.S. importers (***) reported U.S. shipments of U.S. imports of high speed steel CTL plate during 2015. ***.

Table IV-15 presents data for U.S. producers' and U.S. importers' U.S. shipments of high speed steel CTL plate in the 2013-15 period. The three U.S. producers reported *** short tons of U.S. shipments of high speed steel CTL plate, representing *** percent of total U.S. producers' U.S. shipments in 2015. In 2015, there were *** short tons U.S. shipments of imports of high speed steel CTL plate from subject countries (***), accounting for *** percent of U.S. shipments of U.S. imports.

Table IV-15
CTL plate: U.S. producers' and U.S. importers shipments of high speed steel, 2013-15, January to September 2015, and January to September 2016

* * * * * * *

Table IV-16 presents data on U.S. producers' and U.S. importers' composition of select types of CTL plate in their reported shipments. Tool steel and high speed CTL plate on average accounted for two percent or less of U.S. importers' reported U.S. shipments of imports from subject sources over the period of investigation. China was the only source of subject imports from which tool steel and high speed steel CTL plate consistently accounted for a larger share of importers' U.S. shipments than the average.

Table IV-16
CTL plate: U.S. producers' and U.S. importers' composition of select types of CTL plate in their reported U.S. shipments, 2013-15, January to September 2015, and January to September 2016

* * * * * * *

Table IV-17 presents data on U.S. production and imports of carbon structural steel plate as well as other varieties of CTL plate with more limited numbers of suppliers.

[18] High speed steel is defined as alloy steel containing, with or without other elements, at least two of the three elements molybdenum, tungsten and vanadium with a combined content by weight of 7 percent or more, 0.6 percent or more of carbon and 3 to 6 percent of chromium.

Table IV-17
CTL plate: U.S. production and imports of CTL plate, by type

Item	U.S. production	U.S. imports from:							
		Austria	Belgium	Brazil	China	France	Germany	Italy	Japan
	Firms reporting (number)								
Carbon structural steel plate	18	2	4	10	3	2	8	7	6
CrMo pressure vessel plate	2	1	1	0	2	0	2	0	2
Ni pressure vessel plate	2	0	1	0	0	0	2	0	2
Other pressure vessel plate	4	1	3	3	0	1	6	1	3
Tool steel plate	4	6	0	4	8	2	6	1	2
Mold steel plate	4	1	1	1	1	1	4	2	0
Wear/resistant/abrasion resistant plate	6	1	2	1	3	1	2	1	4
Oil-drilling platform plate	3	2	1	0	0	1	5	0	4
Shipbuilding plate	6	1	1	2	0	1	1	0	1
X-70 (or higher) plate a width < 120 inches	4	0	0	0	0	1	1	0	2
X-70 (or higher) plate width > 120 inches	2	0	0	0	0	1	1	0	0
Other plate for line pipe	5	0	0	0	0	1	1	0	0
Sour service plate	3	0	0	0	0	1	0	0	0
High-speed steel plate	3	3	0	0	3	0	2	0	1
Heat-resisting steel plate	3	0	0	0	0	0	0	0	0
Strength steel plate (UHSS or AHSS)	5	1	0	0	1	1	2	0	0
Forged alloy steel plate	0	0	0	0	1	1	1	2	0

Table continued on next page.

Table IV-17—Continued
CTL plate: U.S. production and imports of CTL plate, by type

Item	U.S. imports from:								
	Korea	South Africa	Taiwan	Turkey	Subject sources	Canada	Mexico	All other sources	Nonsubject imports
Carbon structural steel plate	14	4	9	11	44	6	8	19	26
CrMo pressure vessel plate	0	0	0	0	8	2	0	2	2
Ni pressure vessel plate	0	0	0	0	5	2	0	0	0
Other pressure vessel plate	6	0	0	1	18	3	2	5	7
Tool steel plate	1	0	0	0	18	2	0	5	5
Mold steel plate	0	0	0	0	8	0	0	3	3
Wear/resistant/abrasion resistant plate	1	0	0	0	15	4	0	2	5
Oil-drilling platform plate	0	0	0	0	10	4	0	1	1
Shipbuilding plate	4	0	0	0	11	1	1	3	4
X-70 (or higher) plate a width < 120 inches	1	0	0	0	3	2	0	0	1
X-70 (or higher) plate width > 120 inches	0	0	0	0	1	0	0	0	0
Other plate for line pipe	0	0	0	0	1	0	0	0	1
Sour service plate	0	0	0	0	1	0	0	0	0
High-speed steel plate	0	0	0	0	7	1	0	0	0
Heat-resisting steel plate	0	0	0	0	0	0	0	0	0
Strength steel plate (UHSS or AHSS)	0	0	0	0	3	0	0	1	2
Forged alloy steel plate	0	0	0	0	5	0	0	0	0

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

Presence in the market

Table IV-18 presents monthly U.S. imports during January 2013 to September 2016.[19] These data show that imports of CTL plate were present in the U.S. market in every month during the period examined from January 2013 to September 2016 for every subject country except Brazil, South Africa, and Turkey. With respect to Brazil, imports were present in the U.S. market for 6 months in 2013, 11 months in 2014, 12 months in 2015, 9 months during January to September 2015, and 5 months during January to September 2016. With respect to South Africa, imports were present in the U.S. market for 7 months in 2013, 11 months in 2014, 9 months in 2015, 9 months during January to September 2015, and 1 month during January to

[19] Monthly U.S. import quantities are presented in app. E.

September 2016. With respect to Turkey, imports were present in the U.S. market for 10 months in 2013, 12 months in 2014, 12 months in 2015, 9 months during January to September 2015, and 8 months during January to September 2016.

Table IV-18
CTL plate: Monthly presence of U.S. imports, by source, January 2013 through September 2016

Item	Calendar year			January to September	
	2013	2014	2015	2015	2016
	Months present (number)				
U.S. imports from.--					
Austria	12	12	12	9	9
Belgium	12	12	12	9	9
Brazil	6	11	12	9	5
China	12	12	12	9	9
France	12	12	12	9	9
Germany	12	12	12	9	9
Italy	12	12	12	9	9
Japan	12	12	12	9	9
Korea (subject)	12	12	12	9	9
South Africa	7	11	9	9	1
Taiwan	12	12	12	9	9
Turkey	10	12	12	9	8
Subject sources	12	12	12	9	9
Canada	12	12	12	9	9
Korea (nonsubject)	12	12	12	9	9
Mexico	12	12	12	9	9
All other sources	12	12	12	9	9
Nonsubject sources	12	12	12	9	9
Total U.S. imports	12	12	12	9	9

Source: Official U.S. import statistics and proprietary Customs records using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.1190, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed November 8, 2016.

Geographical markets

As illustrated in table IV-19, U.S. Customs districts located in the South[20] accounted for *** of the imports of CTL plate from the subject countries during 2015, whereas U.S. Customs districts located in the East,[21] North,[22] and West[23] accounted for much smaller shares (*** percent, *** percent, and *** percent of imports from the subject countries, respectively).

[20] The "South" includes the following Customs entry districts: Dallas-Fort Worth, Texas; El Paso, Texas; Houston-Galveston, Texas; Laredo, Texas; Miami, Florida; Mobile, Alabama; New Orleans, Louisiana; and Tampa, Florida.

[21] The "East" includes the following Customs entry districts: Baltimore, Maryland; Boston, Massachusetts; Buffalo, New York; Charleston, South Carolina; Charlotte, North Carolina; New York, New York; Norfolk, Virginia; Ogdensburg, New York; Philadelphia, Pennsylvania; Portland, Maine; San Juan, Puerto Rico; Savannah, Georgia; St. Albans, Vermont; and Washington, District of Columbia.

[22] The "North" includes the following Customs entry districts: Chicago, Illinois; Cleveland, Ohio; Detroit, Michigan; Duluth, Minnesota; Great Falls, Montana; Milwaukee, Wisconsin; Minneapolis, Minnesota; and Pembina, North Dakota.

[23] The "West" includes the following Customs entry districts: Columbia-Snake, Oregon; Honolulu, Hawaii; Los Angeles, California; Nogales, Arizona; San Diego, California; San Francisco, California; and Seattle, Washington.

Table IV-19
CTL plate: U.S. imports, by source and border of entry, 2015

Source	Border of entry				
	East	North	South	West	Total
	Quantity (short tons)				
U.S. imports from.--					
Austria	3,252	516	9,513	24	13,305
Belgium	6,060	645	13,414	904	21,023
Brazil	6,819	0	39,364	0	46,183
China	6,139	3,684	44,473	17,944	72,239
France	10,797	7,245	204,141	311	222,494
Germany	21,074	8,431	203,387	2,554	235,445
Italy	5,215	4,239	50,000	0	59,455
Japan	2,655	165	53,606	22,097	78,523
Korea (subject)	***	***	***	***	***
South Africa	593	992	19,911	0	21,495
Taiwan	5,722	145	8,717	20,898	35,482
Turkey	3,194	8,210	11,877	0	23,281
Subject sources	***	***	***	***	***
Canada	42,503	125,844	0	203	168,550
Korea (nonsubject)	***	***	***	***	***
Mexico	1,198	39	48,109	170	49,516
All other sources	15,771	25,767	65,366	3,713	110,617
Nonsubject sources	***	***	***	***	***
Total U.S. imports	206,655	185,930	978,352	117,405	1,488,340
	Share of border of entry by source (percent across)				
U.S. imports from.--					
Austria	24.4	3.9	71.5	0.2	100.0
Belgium	28.8	3.1	63.8	4.3	100.0
Brazil	14.8	0.0	85.2	0.0	100.0
China	8.5	5.1	61.6	24.8	100.0
France	4.9	3.3	91.8	0.1	100.0
Germany	9.0	3.6	86.4	1.1	100.0
Italy	8.8	7.1	84.1	0.0	100.0
Japan	3.4	0.2	68.3	28.1	100.0
Korea (subject)	***	***	***	***	100.0
South Africa	2.8	4.6	92.6	0.0	100.0
Taiwan	16.1	0.4	24.6	58.9	100.0
Turkey	13.7	35.3	51.0	0.0	100.0
Subject sources	***	***	***	***	100.0
Canada	25.2	74.7	0.0	0.1	100.0
Korea (nonsubject)	***	***	***	***	100.0
Mexico	2.4	0.1	97.2	0.3	100.0
All other sources	14.3	23.3	59.1	3.4	100.0
Nonsubject sources	***	***	***	***	100.0
Total U.S. imports	13.9	12.5	65.7	7.9	100.0

Table continued on next page.

Table IV-19—Continued
CTL plate: U.S. imports, by source and border of entry, 2015

Source	Border of entry				
	East	North	South	West	Total
	Share of source by border of entry (percent down)				
U.S. imports from.--					
Austria	1.6	0.3	1.0	0.0	0.9
Belgium	2.9	0.3	1.4	0.8	1.4
Brazil	3.3	0.0	4.0	0.0	3.1
China	3.0	2.0	4.5	15.3	4.9
France	5.2	3.9	20.9	0.3	14.9
Germany	10.2	4.5	20.8	2.2	15.8
Italy	2.5	2.3	5.1	0.0	4.0
Japan	1.3	0.1	5.5	18.8	5.3
Korea (subject)	***	***	***	***	***
South Africa	0.3	0.5	2.0	0.0	1.4
Taiwan	2.8	0.1	0.9	17.8	2.4
Turkey	1.5	4.4	1.2	0.0	1.6
Subject sources	***	***	***	***	***
Canada	20.6	67.7	0.0	0.2	11.3
Korea (nonsubject)	***	***	***	***	***
Mexico	0.6	0.0	4.9	0.1	3.3
All other sources	7.6	13.9	6.7	3.2	7.4
Nonsubject sources	***	***	***	***	***
Total U.S. imports	100.0	100.0	100.0	100.0	100.0

Note.--In 2015, the three highest-volume ports of entry for each of the subject import sources were as follows:

- Austria: Houston-Galveston, TX; Philadelphia, PA; and Baltimore, MD.
- Belgium: Houston-Galveston, TX; Philadelphia, PA; and Savannah, GA.
- Brazil: New Orleans, LA; Houston-Galveston, TX; and Boston, MA.
- China: New Orleans, LA; Houston-Galveston, TX; and Los Angeles, CA.
- France: Tampa, FL; Houston-Galveston, TX; and Philadelphia, PA.
- Germany subject: Tampa, FL; Houston-Galveston, TX; and Philadelphia, PA.
- Italy: New Orleans, LA; Houston-Galveston, TX; and Philadelphia, PA.
- Japan: Houston-Galveston, TX; New Orleans, LA; and Los Angeles, CA.
- Korea subject: Houston-Galveston, TX; New Orleans, LA; and Mobile, AL.
- South Africa: Houston-Galveston, TX; New Orleans, LA; and Detroit, MI.
- Taiwan: Columbia-Snake, OR; Los Angeles, CA; and Houston-Galveston, TX.
- Turkey: New Orleans, LA; Detroit, MI; and Houston-Galveston, TX.

Source: Official U.S. import statistics using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.1190, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed April 26, 2016 with modification based on proprietary Customs records for the same HTS numbers to identify as “Korea subject” plate produced by POSCO and POSCO affiliates, as well as imports from Korea produced/exported by non-POSCO entities, provided such imports were not subject to the existing antidumping and countervailing duty orders (*i.e.*, alloy steel plate).

Apparent U.S. consumption

Table IV-20 and figure IV-2 present data on apparent U.S. consumption of CTL plate. These data show that apparent U.S. consumption in terms of quantity increased by 12.6 percent from 2013 to 2014, decreased by 16.6 percent from 2014 to 2015, and was 9.8 percent lower during January to September than during January to September 2015. Overall, apparent U.S. consumption was 6.0 percent lower in 2015 than in 2013. Similar but more magnified trends were reported for apparent U.S. consumption of CTL plate in terms of value.

Table IV-20
CTL plate: Apparent U.S. consumption, 2013-15, January to September 2015, and January to September 2016

Item	Calendar year			January to September	
	2013	2014	2015	2015	2016
	Quantity (short tons)				
U.S. producers' U.S. shipments	7,921,986	8,157,818	6,807,726	5,393,745	4,992,656
U.S. imports from.--					
Austria	50,292	52,031	13,305	11,883	14,564
Belgium	7,873	32,400	21,023	18,544	17,281
Brazil	22,152	137,460	46,183	34,348	8,428
China	29,221	47,992	72,239	32,943	37,718
France	87,727	111,176	217,558	199,409	104,263
Germany	138,540	72,631	234,810	205,366	142,329
Italy	46,508	97,326	59,455	55,472	28,915
Japan	48,325	76,002	77,500	71,632	31,959
Korea (subject)	***	***	***	***	***
South Africa	5,174	38,252	21,495	15,401	93
Taiwan	34,302	58,472	35,482	30,610	10,600
Turkey	20,079	116,494	23,281	15,070	35,575
Subject sources	***	***	***	***	***
Canada	175,743	185,888	166,604	128,464	126,234
Korea (nonsubject)	***	***	***	***	***
Mexico	55,966	83,862	49,516	36,105	40,682
All other sources	97,054	354,289	110,617	89,938	49,243
Nonsubject sources	***	***	***	***	***
Total U.S. imports	897,417	1,773,391	1,479,800	1,226,867	979,304
Apparent U.S. consumption	8,819,403	9,931,209	8,287,526	6,620,612	5,971,960

Table continued on next page.

Table IV-20—Continued
CTL plate: Apparent U.S. consumption, 2013-15, January to September 2015, and January to September 2016

Item	Calendar year			January to September	
	2013	2014	2015	2015	2016
	Value (1,000 dollars)				
U.S. producers' U.S. shipments	6,084,393	6,883,745	4,703,435	3,900,417	3,008,689
U.S. imports from.--					
Austria	53,016	51,434	15,353	13,569	13,983
Belgium	8,676	32,544	20,921	18,239	18,434
Brazil	14,890	95,565	28,386	23,134	3,567
China	50,150	64,801	74,601	48,600	33,370
France	85,196	108,137	167,625	151,914	72,426
Germany	132,899	97,294	194,609	169,151	123,619
Italy	34,207	71,988	40,484	38,055	19,507
Japan	49,909	61,615	57,964	53,748	21,497
Korea (subject)	***	***	***	***	***
South Africa	3,398	23,436	10,626	8,275	39
Taiwan	23,061	41,149	22,986	20,586	5,232
Turkey	12,432	73,789	13,425	10,083	14,789
Subject sources	***	***	***	***	***
Canada	147,708	161,584	113,848	90,253	75,703
Korea (nonsubject)	***	***	***	***	***
Mexico	34,706	58,271	24,985	19,086	17,886
All other sources	95,956	301,008	99,029	82,185	44,007
Nonsubject sources	***	***	***	***	***
Total U.S. imports	799,507	1,462,312	1,114,132	944,466	668,151
Apparent U.S. consumption	6,883,900	8,346,057	5,817,567	4,844,883	3,676,840

Source: Official U.S. import statistics and proprietary Customs records using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.1190, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed November 8, 2016, with adjustments based on data submitted in response to Commission questionnaires.

Figure IV-2
CTL plate: Apparent U.S. consumption, 2013-15, January to September 2015, and January to September 2016

* * * * * * *

U.S. market shares

U.S. market share data for CTL plate are presented in table IV-21. These data show that the U.S. producers' market share decreased from 89.8 percent in 2013 to 82.1 percent in 2014, remained the same in 2015, and was 83.6 percent during January to September 2016, up from 81.5 percent during January to September 2015. Although the subject countries combined gained market share overall from 2013 to 2015, Austria consistently lost market share from 0.6 percent of the market in 2013 to 0.2 percent of the market in 2014 and 2015.

Table IV-21
CTL plate: Market shares, 2013-15, January to September 2015, and January to September 2016

Item	Calendar year			January to September	
	2013	2014	2015	2015	2016
	Quantity (short tons)				
Apparent U.S. consumption	8,819,403	9,931,209	8,287,526	6,620,612	5,971,960
	Share of quantity (percent)				
U.S. producers' U.S. shipments	89.8	82.1	82.1	81.5	83.6
U.S. imports from.--					
Austria	0.6	0.5	0.2	0.2	0.2
Belgium	0.1	0.3	0.3	0.3	0.3
Brazil	0.3	1.4	0.6	0.5	0.1
China	0.3	0.5	0.9	0.5	0.6
France	1.0	1.1	2.6	3.0	1.7
Germany	1.6	0.7	2.8	3.1	2.4
Italy	0.5	1.0	0.7	0.8	0.5
Japan	0.5	0.8	0.9	1.1	0.5
Korea subject	***	***	***	***	***
South Africa	0.1	0.4	0.3	0.2	0.0
Taiwan	0.4	0.6	0.4	0.5	0.2
Turkey	0.2	1.2	0.3	0.2	0.6
Subject sources	***	***	***	***	***
Canada	2.0	1.9	2.0	1.9	2.1
Korea nonsubject	***	***	***	***	***
Mexico	0.6	0.8	0.6	0.5	0.7
All other sources	1.1	3.6	1.3	1.4	0.8
Nonsubject sources	***	***	***	***	***
Total U.S. imports	10.2	17.9	17.9	18.5	16.4

Table continued on next page.

Table IV-21—Continued
CTL plate: Market shares, 2013-15, January to September 2015, and January to September 2016

Item	Calendar year			January to September	
	2013	2014	2015	2015	2016
	Value (1,000 dollars)				
Apparent U.S. consumption	6,883,900	8,346,057	5,817,567	4,844,883	3,676,840
	Share of value (percent)				
U.S. producers' U.S. shipments	88.4	82.5	80.8	80.5	81.8
U.S. imports from.--					
Austria	0.8	0.6	0.3	0.3	0.4
Belgium	0.1	0.4	0.4	0.4	0.5
Brazil	0.2	1.1	0.5	0.5	0.1
China	0.7	0.8	1.3	1.0	0.9
France	1.2	1.3	2.9	3.1	2.0
Germany	1.9	1.2	3.3	3.5	3.4
Italy	0.5	0.9	0.7	0.8	0.5
Japan	0.7	0.7	1.0	1.1	0.6
Korea (subject)	***	***	***	***	***
South Africa	0.0	0.3	0.2	0.2	0.0
Taiwan	0.3	0.5	0.4	0.4	0.1
Turkey	0.2	0.9	0.2	0.2	0.4
Subject sources	***	***	***	***	***
Canada	2.1	1.9	2.0	1.9	2.1
Korea (nonsubject)	***	***	***	***	***
Mexico	0.5	0.7	0.4	0.4	0.5
All other sources	1.4	3.6	1.7	1.7	1.2
Nonsubject sources	***	***	***	***	***
Total U.S. imports	11.6	17.5	19.2	19.5	18.2

Source: Official U.S. import statistics and proprietary Customs records using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.1190, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed on November 8, 2016, with adjustments based on data submitted in response to Commission questionnaires.

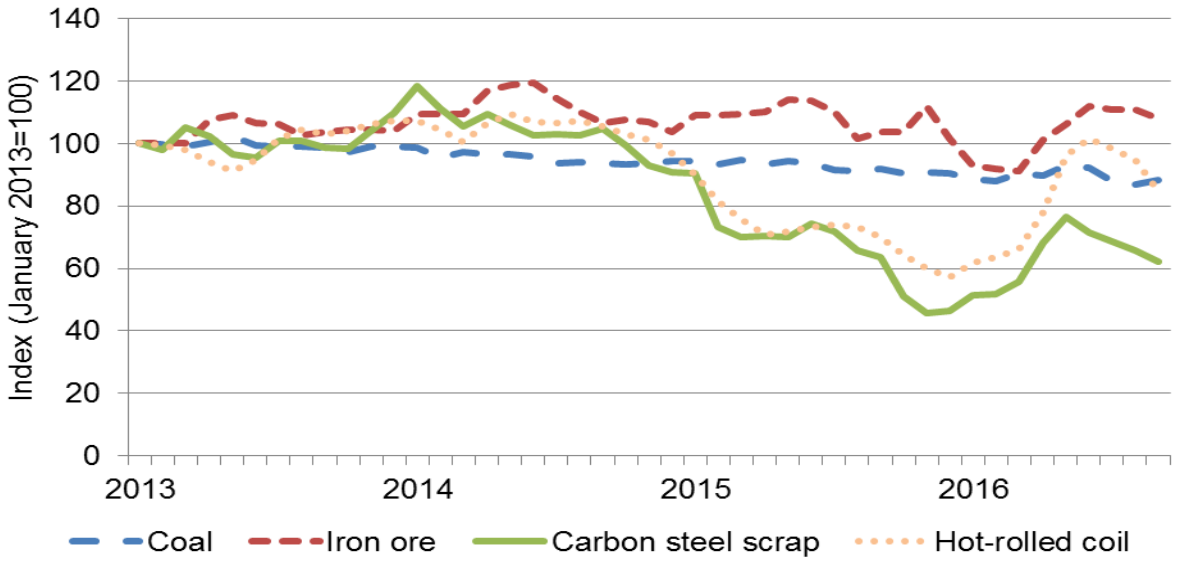
PART V: PRICING DATA

FACTORS AFFECTING PRICES

Raw material costs

Raw materials constitute a substantial portion of the final costs of CTL plate. The primary raw materials used to produce CTL plate include iron ore, coal, iron and steel scrap, and hot-rolled coil. Prices for these raw materials fluctuated but decreased overall during January 2013-September 2016. Between January 2013 and September 2016 prices for coal, carbon steel scrap, and hot-rolled coil decreased by 11.6, 38.0, and 15.3 percent, respectively, while prices for iron ore increased by 8.1 percent (figure V-1). U.S. producers' raw material costs as a share of the cost of goods sold ("COGS") decreased from 62.7 percent in 2013 and 2014 to 57.0 percent in 2015, and was 55.5 percent in the first nine months of 2016, compared with 58.5 percent in the first nine months of 2015.

Figure V-1
Raw material costs: Producer price indexes of iron ore, coal, iron and steel scrap, and hot-rolled coil in the United States, monthly, January 2013-September 2016



Source: U.S. Bureau of Labor Statistics, November 6, 2016, and American Metal Markets, November 8, 2016.

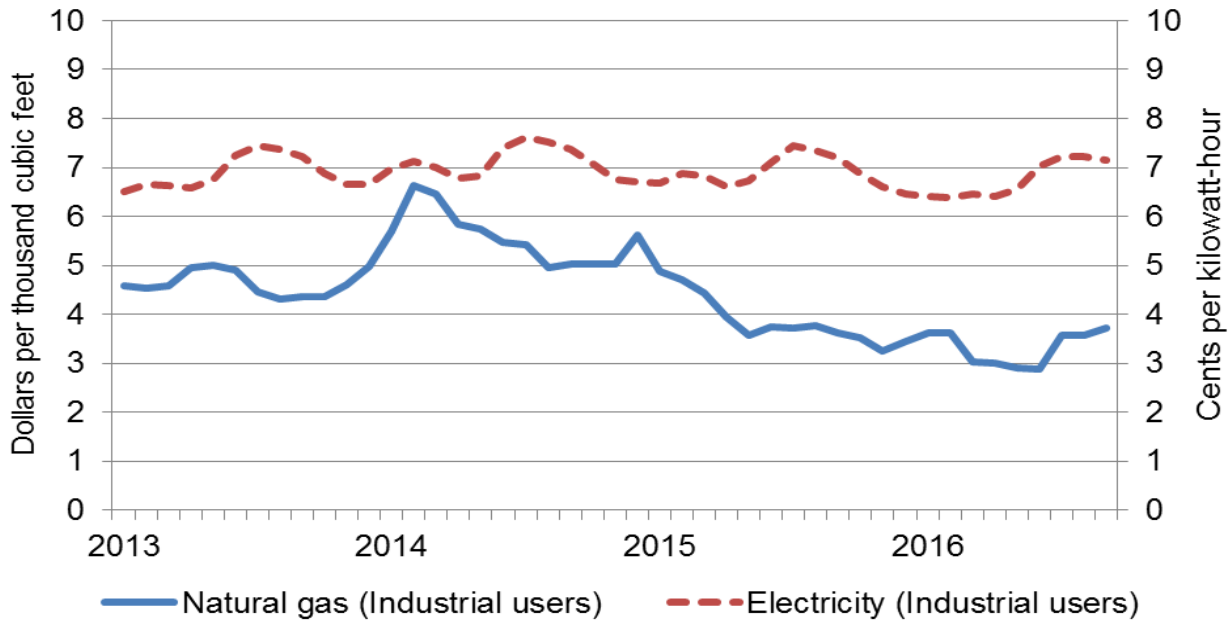
All 14 responding U.S. producers, 58 of 59 importers, and 58 of 65 responding purchasers reported that raw material prices had either fluctuated or decreased since January 2013. Six U.S. producers reported that raw material prices decreased while nine reported that raw material prices had fluctuated.[1] Similarly, 31 of 59 responding importers and 26 of 63 responding purchasers reported that raw material prices had decreased while 27 importers and 30 purchasers reported that they had fluctuated.

Half (9 of 18) of responding producers, just over 40 percent (32 of 75) of responding importers, and almost half (41 of 84) of responding purchasers reported that raw material pricing affected the price negotiations or prices paid for the CTL plate that they sold, imported, or purchased since January 1, 2013. While four producers (***) noted that raw material prices—including hot-rolled coil prices for processors—impact CTL plate prices, four (***) also noted that market conditions or imports have a greater impact on prices. Alloys (e.g., chromium, manganese, molybdenum, nickel, vanadium), coking coal, energy products like oil and gas, iron ore, and scrap were most often cited by importers and purchasers as having an effect either on CTL prices or the levels of surcharges paid. Three of 17 responding producers indicated that their sales are indexed to raw material prices, and 9 of 78 responding importers and 18 of 83 responding purchasers reported that their imports and purchases are indexed to raw material costs such as those published by American Metal Market, CRU, the London Metals Exchange, or Metal Bulletin.

Energy costs are another important factor in CTL plate production. Electricity prices fluctuated slightly from January 2013 to August 2016, mainly due to monthly fluctuations in demand for electricity. Although electricity prices increased by 10 percent through the entire period, they were 1 percent lower in September 2016 than in September 2013 (figure V-2). Natural gas prices increased by 45 percent from 2013 until early 2014, but declined by 55 percent through April 2016. Between April 2016 and September 2016, natural gas prices have increased by 24 percent, leading to an overall decrease of 19 percent between January 2013 and September 2016.

[1] During U.S. producer Nucor's quarterly earnings conference call in April 2015, it was noted by the firm's president and CEO that their St. James Parish facility – which produces direct-reduced iron ("DRI") – produced 1.3 million tons of DRI during the previous year, and that this was a "meaningful factor supporting February {2015}'s dramatic downward adjustment of more than $100 per ton in scrap pricing." Nucor Corporation's Q1 2015 Earnings conference call transcript, available at http://s.t.st/media/xtranscript/2015/Q2/13125011.pdf. U.S. producer *** reported both decreasing and fluctuating raw material prices.

Figure V-2
Industrial natural gas and electricity: Monthly prices, January 2013-September 2016



Source: *Short-Term Energy Outlook December 2016*, Energy Information Administration, www.eia.gov, retrieved December 7, 2016.

U.S. inland transportation costs

Fifteen of 20 U.S. producers and just over half of responding importers (42 of 77) reported that they typically arrange transportation to their customers. Most U.S. producers reported that their U.S. inland transportation costs ranged from 2 to 8 percent of the total delivered cost. Similarly, most responding importers (43 of 47) reported inland transportation costs of 1 to 10 percent, with 47 of 70 shipping from the point of importation.

PRICING PRACTICES

Pricing methods

As presented in table V-1, all but one responding U.S. producer and a large majority of importers sell CTL plate on a transaction-by-transaction basis. Eight of the 18 responding U.S. producers also sell via contract, whereas less than one-quarter of importers do. A few producers and importers use set price lists or some other method of price setting, such as referencing competing import or market prices, or using short-term, back-to-back contracts.

Table V-1
CTL plate: U.S. producers and importers reported price setting methods, by number of responding firms[1]

Method	U.S. producers	Importers
Transaction-by-transaction	18	73
Contract	8	18
Set price list	5	8
Other	1	8
Total responding	19	85

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

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

U.S. producers reported selling more than half of their product in the spot market and importers reported selling nearly two-thirds of their product in the spot market (table V-2). A majority of U.S. producers' and importers' short-term contracts do not allow for price renegotiation, but half of importers' and producers' annual contracts and *** long-term contracts do. A majority of their short-term, annual, and long-term contracts do not contain meet-or-release provisions, and fix both price and quantity.

Table V-2
CTL plate: U.S. producers' and importers' shares of U.S. commercial shipments by type of sale, 2015

Type of sale	U.S. producers	Importers
Long-term contracts	4.6	0.0
Annual contracts	6.5	3.2
Short-term contracts	37.5	30.4
Spot sales	51.3	66.3
Total	100.0	100.0

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

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

Sales terms and discounts

U.S. producers and importers were nearly evenly divided between quoting prices on an f.o.b. or delivered basis.[2] The majority of U.S. producers (14 of 19) and importers (68 of 81) do not offer discounts. Of those producers that offer discounts, three offer quantity discounts, two offer total volume discounts, and one offers a "foreign fighter" discount and rebates based on annual volume. Among importers, seven offer quantity discounts, five offer total volume discounts, and one offers an annual volume rebate. The majority of producers and importers

[2] Slightly more importers reported quoting prices on an f.o.b. basis (41) than on a delivered basis (34).

reported sales terms of net 30 days. In addition, nine producers and five importers offer terms of net 30 days but offer a discount for payment within 10 days.

Price leadership

Fifty-six purchasers specified CTL plate suppliers that they consider to be price leaders in the market. Domestic producers were named by 48 of the 56 responding purchasers, with Nucor named by more purchasers (40) than ArcelorMittal USA (16), SSAB (14), and JSW (1) combined.[3] In their explanations of how domestic firms led prices, 19 reported that the domestic mills initiated price increases, 6 led price increases or decreases, and 19 reported they led in price changes generally but did not specify in which direction. Nucor was listed by all six purchasers that stated that a domestic mill lead prices upward or downward, compared with one purchaser each reporting AreclorMittal USA or SSAB doing so. Three purchasers (***) noted specifically that domestic mills do not announce price decreases.

Ten of 56 responding purchasers indicated that some other firm or firms were price leaders. Five of these purchasers mentioned producers/importers of tool steel, with four mentioning Bohler (including Bohler-Edelstahl and Bohler-Uddeholm). Purchaser *** stated that Bohler-Uddeholm is the "{l}argest producer of alloy tool steel plate {and} sheet globally. If not the highest priced always close to highest." Purchaser *** reported Bohler and ArcelorMittal USA as leaders, adding that "{w}e only buy certain products from both of these firms. Most of which they do not compete against each other on. It is easy to be a price leader when there are a limited amount of mills in the world who produce quality tool steel products." The other tool steel suppliers mentioned include Finkl, Latrobe Specialty Steel Distribution, S B Metals, and Schmolz+Bickenbach. Of the other five responding purchasers, *** stated that ArcelorMittal, Dillinger, Kobe, and POSCO are all price leaders based on geography; *** stated that Kloeckner does "not {have} much leadership but they just buy heavy import and sell off that number"; *** stated Cargill Steel will "typically lead a price change"; *** stated Kenilworth Steel is a leader that "{follows} the steel market conditions"; and *** stated POSCO "continued to be the lowest cost provider."

Three purchasers did not mention any specific price leaders, but described price leadership in the market. ***, a manufacturer of large diameter steel pipes, stated that price leadership was not applicable to its market but that "the lower prices generally come from Asia (Japan & Korea)." *** stated "{d}umped and subsidized imports generally lead prices downwards while domestic suppliers generally lead price increases." In addition, purchaser *** stated that it did not "have any information on price leaders as prices for Offshore Grade TMCP plate are based on projects and not market/commodity prices." Finally, purchaser *** reported that its prices follow a price index, not price increase or decrease letters, and purchaser *** negotiates all its prices, so it could not name any price leaders.

[3] This does not include one purchaser which stated broadly that "U.S. domestic mills" are price leaders.

PRICE DATA

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following CTL plate products shipped to unrelated U.S. customers during January 2013-September 2016 and purchase costs for two products from select countries:[4]

Product 1.-- Hot-rolled CTL carbon steel plate, ASTM A-36 or equivalent as rolled, mill edge, not heat treated, not cleaned or oiled, in cut lengths, 72" through 96" in width, 0.250" thick.

Product 2.-- Hot-rolled CTL carbon steel plate, ASTM A-36 or equivalent as rolled, mill edge, not heat treated, not cleaned or oiled, in cut lengths, 72" through 96" in width, 0.3125" thick.

Product 3.-- Hot-rolled CTL carbon steel plate, ASTM A-36 or equivalent as rolled, mill edge, not heat treated, not cleaned or oiled, in cut lengths, 72" through 120" in width, 0.375" through 3.00" in thickness.

Product 4.-- Hot-rolled CTL carbon steel plate, high strength low alloy (HSLA), ASTM A-572, Grade 50, mill edge, not cleaned or oiled, in cut lengths, 72" through 120" in width, 0.5" through 1.5" in thickness.

Product 5.-- Hot-rolled CTL carbon steel plate, API X-70 or equivalent as rolled, mill or cut edge, not heat treated, not cleaned or oiled, in cut lengths, 72" through 152" in width, 0.375" through 1.0" thick.

Product 6.-- Hot-rolled CTL plate, AISI A2 or equivalent as rolled, mill edge, annealed, descaled, in random lengths from 73"-144", 20"-41" in width and from 0.187" through 3.5" thick.

[4] Data were requested for products 5 and 6 from Austria, France, Germany, Japan, and Korea (POSCO).

Ten U.S. producers and 43 importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products, quarters, or countries.[5] Pricing data reported by these firms accounted for 34.4 percent of U.S. producers' shipments in 2015, as well as the following percentages of imports from subject countries: Austria (3.1 percent), Belgium (15.4 percent), Brazil (55.3 percent), China (1.3 percent), France (0.6 percent), Germany (less than 0.1 percent), Italy (53.0 percent), Japan (43.3 percent), Korea (54.1 percent), South Africa (50.2 percent), Taiwan (28.2 percent), and Turkey (81.0 percent).[6]

Price data for products 1-6[7] are presented in tables V-3 to V-8 and figures V-3 to V-8. Nonsubject country prices and comparisons are presented in Appendix F.

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

[6] These shares include do not include data for product 5 which were imported and internally consumed. If included, the share of imports from France increases to *** percent, from Germany to *** percent, from Japan to *** percent, and from Korea (POSCO) to *** percent.

[7] Pricing products 1-5 in the final phase of these investigations were the same as those in the preliminary phase of these investigations. The Commission added a sixth pricing product in the final phase since there was no tool steel pricing product in the preliminary phase. There was also no pricing data for Austria in products 1-5 in the preliminary phase. A tool steel product was suggested by both petitioners and Austrian respondents. Petitioners' comments on draft questionnaires, p. 8 and Austrian respondents' comments on draft questionnaires, p. 11. The tool steel products suggested by both parties were similar. In order to better capture some Austrian data so the Commission had some point for comparison, the product suggested by the Austrian respondents was selected.

Table V-3
CTL plate: Weighted-average f.o.b. prices and quantities of domestic and imported product 1[1] and margins of underselling/(overselling), by quarters, January 2013-September 2016

Period	United States		Belgium			Brazil		
	Price (dollars per short ton)	Quantity (short tons)	Price (dollars per short ton)	Quantity (short tons)	Margin (percent)	Price (dollars per short ton)	Quantity (short tons)	Margin (percent)
2013: Jan.-Mar.	740	125,788	--	0	--	***	***	***
Apr.-June	741	127,550	--	0	--	***	***	***
July-Sept.	724	114,290	--	0	--	--	0	--
Oct.-Dec.	744	119,572	--	0	--	***	***	***
2014: Jan.-Mar.	779	125,232	--	0	--	***	***	***
Apr.-June	785	127,050	--	0	--	***	***	***
July-Sept.	809	121,040	--	0	--	***	***	***
Oct.-Dec.	805	112,830	***	***	***	***	***	***
2015: Jan.-Mar.	729	119,900	***	***	***	***	***	***
Apr.-June	638	112,564	--	0	--	***	***	***
July-Sept.	627	102,987	--	0	--	***	***	***
Oct.-Dec.	595	90,234	--	0	--	***	***	***
2016: Jan.-Mar.	523	117,115	--	0	--	--	0	--
Apr.-June	569	111,873	--	0	--	--	0	--
July-Sept.	653	80,063	***	***	***	--	0	--

Period	United States		China			Japan		
2013: Jan.-Mar.	740	125,788	--	0	--	***	***	***
Apr.-June	741	127,550	--	0	--	--	0	--
July-Sept.	724	114,290	--	0	--	--	0	--
Oct.-Dec.	744	119,572	--	0	--	--	0	--
2014: Jan.-Mar.	779	125,232	--	0	--	--	0	--
Apr.-June	785	127,050	--	0	--	--	0	--
July-Sept.	809	121,040	--	0	--	--	0	--
Oct.-Dec.	805	112,830	***	***	***	***	***	***
2015: Jan.-Mar.	729	119,900	--	0	--	--	0	--
Apr.-June	638	112,564	--	0	--	--	0	--
July-Sept.	627	102,987	--	0	--	--	0	--
Oct.-Dec.	595	90,234	--	0	--	--	0	--
2016: Jan.-Mar.	523	117,115	--	0	--	--	0	--
Apr.-June	569	111,873	--	0	--	--	0	--
July-Sept.	653	80,063	--	0	--	--	0	--

Table continued on next page.

Table V-3—Continued
CTL plate: Weighted-average f.o.b. prices and quantities of domestic and imported product 1[1] and margins of underselling/(overselling), by quarters, January 2013-September 2016

Period	United States		Korea (POSCO)			South Africa		
	Price (dollars per short ton)	Quantity (short tons)	Price (dollars per short ton)	Quantity (short tons)	Margin (percent)	Price (dollars per short ton)	Quantity (short tons)	Margin (percent)
2013: Jan.-Mar.	740	125,788	***	***	***	--	0	--
Apr.-June	741	127,550	***	***	***	--	0	--
July-Sept.	724	114,290	***	***	***	--	0	--
Oct.-Dec.	744	119,572	***	***	***	***	***	***
2014: Jan.-Mar.	779	125,232	***	***	***	***	***	***
Apr.-June	785	127,050	***	***	***	***	***	***
July-Sept.	809	121,040	***	***	***	--	0	--
Oct.-Dec.	805	112,830	***	***	***	***	***	***
2015: Jan.-Mar.	729	119,900	***	***	***	--	0	--
Apr.-June	638	112,564	***	***	***	--	0	--
July-Sept.	627	102,987	***	***	***	--	0	--
Oct.-Dec.	595	90,234	***	***	***	--	0	--
2016: Jan.-Mar.	523	117,115	***	***	***	--	0	--
Apr.-June	569	111,873	***	***	***	--	0	--
July-Sept.	653	80,063	***	***	***	--	0	--

Period	United States		Taiwan			Turkey		
2013: Jan.-Mar.	740	125,788	***	***	***	--	0	--
Apr.-June	741	127,550	***	***	***	--	0	--
July-Sept.	724	114,290	***	***	***	--	0	--
Oct.-Dec.	744	119,572	***	***	***	--	0	--
2014: Jan.-Mar.	779	125,232	***	***	***	--	0	--
Apr.-June	785	127,050	***	***	***	--	0	--
July-Sept.	809	121,040	***	***	***	--	0	--
Oct.-Dec.	805	112,830	***	***	***	***	***	***
2015: Jan.-Mar.	729	119,900	***	***	***	--	0	--
Apr.-June	638	112,564	***	***	***	--	0	--
July-Sept.	627	102,987	***	***	***	--	0	--
Oct.-Dec.	595	90,234	***	***	***	***	***	***
2016: Jan.-Mar.	523	117,115	***	***	***	--	0	--
Apr.-June	569	111,873	***	***	***	***	***	***
July-Sept.	653	80,063	***	***	***	--	0	--

[1] Product 1: Hot-rolled CTL carbon steel plate, ASTM A-36 or equivalent as rolled, mill edge, not heat treated, not cleaned or oiled, in cut lengths, 72" through 96" in width, 0.250" thick.

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

Table V-4
CTL plate: Weighted-average f.o.b. prices and quantities of domestic and imported product 2[1] and margins of underselling/(overselling), by quarters, January 2013-September 2016

Period	United States		Brazil			Japan		
	Price (dollars per short ton)	Quantity (short tons)	Price (dollars per short ton)	Quantity (short tons)	Margin (percent)	Price (dollars per short ton)	Quantity (short tons)	Margin (percent)
2013: Jan.-Mar.	712	21,518	--	0	--	--	0	--
Apr.-June	715	23,312	***	***	***	--	0	--
July-Sept.	697	26,433	--	0	--	--	0	--
Oct.-Dec.	712	20,497	***	***	***	--	0	--
2014: Jan.-Mar.	761	18,891	***	***	***	--	0	--
Apr.-June	774	19,680	***	***	***	--	0	--
July-Sept.	794	21,862	***	***	***	***	***	***
Oct.-Dec.	797	19,946	***	***	***	--	0	--
2015: Jan.-Mar.	727	19,799	***	***	***	***	***	***
Apr.-June	622	22,271	--	0	--	***	***	***
July-Sept.	588	16,658	***	***	***	***	***	***
Oct.-Dec.	530	17,873	--	0	--	--	0	--
2016: Jan.-Mar.	468	22,276	--	0	--	***	***	***
Apr.-June	553	19,888	--	0	--	--	0	--
July-Sept.	589	11,881	--	0	--	***	***	***

Period	United States		Korea (POSCO)			South Africa		
2013: Jan.-Mar.	712	21,518	***	***	***	--	0	--
Apr.-June	715	23,312	***	***	***	--	0	--
July-Sept.	697	26,433	--	0	--	--	0	--
Oct.-Dec.	712	20,497	--	0	--	--	0	--
2014: Jan.-Mar.	761	18,891	--	0	--	***	***	***
Apr.-June	774	19,680	***	***	***	***	***	***
July-Sept.	794	21,862	***	***	***	--	0	--
Oct.-Dec.	797	19,946	***	***	***	***	***	***
2015: Jan.-Mar.	727	19,799	***	***	***	--	0	--
Apr.-June	622	22,271	***	***	***	--	0	--
July-Sept.	588	16,658	***	***	***	--	0	--
Oct.-Dec.	530	17,873	***	***	***	--	0	--
2016: Jan.-Mar.	468	22,276	--	0	--	--	0	--
Apr.-June	553	19,888	***	***	***	--	0	--
July-Sept.	589	11,881	***	***	***	--	0	--

Table continued on next page.

Table V-4—Continued
CTL plate: Weighted-average f.o.b. prices and quantities of domestic and imported product 2[1] and margins of underselling/(overselling), by quarters, January 2013-September 2016

Period	United States		Taiwan			Turkey		
	Price (dollars per short ton)	Quantity (short tons)	Price (dollars per short ton)	Quantity (short tons)	Margin (percent)	Price (dollars per short ton)	Quantity (short tons)	Margin (percent)
2013: Jan.-Mar.	712	21,518	***	***	***	--	0	--
Apr.-June	715	23,312	***	***	***	--	0	--
July-Sept.	697	26,433	***	***	***	--	0	--
Oct.-Dec.	712	20,497	***	***	***	--	0	--
2014: Jan.-Mar.	761	18,891	--	0	--	--	0	--
Apr.-June	774	19,680	***	***	***	--	0	--
July-Sept.	794	21,862	***	***	***	***	***	***
Oct.-Dec.	797	19,946	***	***	***	***	***	***
2015: Jan.-Mar.	727	19,799	***	***	***	***	***	***
Apr.-June	622	22,271	***	***	***	***	***	***
July-Sept.	588	16,658	--	0	--	--	0	--
Oct.-Dec.	530	17,873	--	0	--	--	0	--
2016: Jan.-Mar.	468	22,276	***	***	***	--	0	--
Apr.-June	553	19,888	--	0	--	--	0	--
July-Sept.	589	11,881	***	***	***	--	0	--

[1] Product 2: Hot-rolled CTL carbon steel plate, ASTM A-36 or equivalent as rolled, mill edge, not heat treated, not cleaned or oiled, in cut lengths, 72" through 96" in width, 0.3125" thick.

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

Table V-5
CTL plate: Weighted-average f.o.b. prices and quantities of domestic and imported product 3[1] and margins of underselling/(overselling), by quarters, January 2013-September 2016

Period	United States		Belgium			Brazil		
	Price (dollars per short ton)	Quantity (short tons)	Price (dollars per short ton)	Quantity (short tons)	Margin (percent)	Price (dollars per short ton)	Quantity (short tons)	Margin (percent)
2013: Jan.-Mar.	678	374,658	--	0	--	***	***	***
Apr.-June	695	389,903	--	0	--	***	***	***
July-Sept.	676	381,901	--	0	--	***	***	***
Oct.-Dec.	676	386,378	--	0	--	***	***	***
2014: Jan.-Mar.	736	358,043	--	0	--	***	***	***
Apr.-June	765	363,497	--	0	--	***	***	***
July-Sept.	790	383,120	***	***	***	***	***	***
Oct.-Dec.	787	322,874	***	***	***	***	***	***
2015: Jan.-Mar.	706	271,504	***	***	***	***	***	***
Apr.-June	597	296,512	***	***	***	***	***	***
July-Sept.	548	278,254	--	0	--	***	***	***
Oct.-Dec.	477	267,519	--	0	--	***	***	***
2016: Jan.-Mar.	450	329,570	--	0	--	***	***	***
Apr.-June	520	371,578	--	0	--	***	***	***
July-Sept.	552	235,559	--	0	--	--	0	--

Period	United States		China			Italy		
2013: Jan.-Mar.	678	374,658	--	0	--	***	***	***
Apr.-June	695	389,903	***	***	***	***	***	***
July-Sept.	676	381,901	--	0	--	***	***	***
Oct.-Dec.	676	386,378	--	0	--	***	***	***
2014: Jan.-Mar.	736	358,043	--	0	--	***	***	***
Apr.-June	765	363,497	--	0	--	***	***	***
July-Sept.	790	383,120	--	0	--	***	***	***
Oct.-Dec.	787	322,874	***	***	***	***	***	***
2015: Jan.-Mar.	706	271,504	--	0	--	***	***	***
Apr.-June	597	296,512	--	0	--	***	***	***
July-Sept.	548	278,254	--	0	--	***	***	***
Oct.-Dec.	477	267,519	--	0	--	***	***	***
2016: Jan.-Mar.	450	329,570	--	0	--	***	***	***
Apr.-June	520	371,578	--	0	--	***	***	***
July-Sept.	552	235,559	--	0	--	***	***	***

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Table V-5—Continued
CTL plate: Weighted-average f.o.b. prices and quantities of domestic and imported product 3[1] and margins of underselling/(overselling), by quarters, January 2013-September 2016

Period	United States		Japan			Korea (POSCO)		
	Price (dollars per short ton)	Quantity (short tons)	Price (dollars per short ton)	Quantity (short tons)	Margin (percent)	Price (dollars per short ton)	Quantity (short tons)	Margin (percent)
2013: Jan.-Mar.	678	374,658	***	***	***	***	***	***
Apr.-June	695	389,903	--	0	--	***	***	***
July-Sept.	676	381,901	--	0	--	***	***	***
Oct.-Dec.	676	386,378	--	0	--	***	***	***
2014: Jan.-Mar.	736	358,043	--	0	--	***	***	***
Apr.-June	765	363,497	--	0	--	***	***	***
July-Sept.	790	383,120	***	***	***	***	***	***
Oct.-Dec.	787	322,874	***	***	***	***	***	***
2015: Jan.-Mar.	706	271,504	***	***	***	***	***	***
Apr.-June	597	296,512	***	***	***	***	***	***
July-Sept.	548	278,254	***	***	***	***	***	***
Oct.-Dec.	477	267,519	***	***	***	***	***	***
2016: Jan.-Mar.	450	329,570	***	***	***	***	***	***
Apr.-June	520	371,578	***	***	***	***	***	***
July-Sept.	552	235,559	***	***	***	***	***	***

Period	United States		South Africa			Taiwan		
2013: Jan.-Mar.	678	374,658	--	0	--	***	***	***
Apr.-June	695	389,903	--	0	--	***	***	***
July-Sept.	676	381,901	--	0	--	***	***	***
Oct.-Dec.	676	386,378	***	***	***	***	***	***
2014: Jan.-Mar.	736	358,043	***	***	***	***	***	***
Apr.-June	765	363,497	***	***	***	***	***	***
July-Sept.	790	383,120	***	***	***	***	***	***
Oct.-Dec.	787	322,874	***	***	***	***	***	***
2015: Jan.-Mar.	706	271,504	--	0	--	***	***	***
Apr.-June	597	296,512	***	***	***	***	***	***
July-Sept.	548	278,254	***	***	***	***	***	***
Oct.-Dec.	477	267,519	***	***	***	***	***	***
2016: Jan.-Mar.	450	329,570	***	***	***	***	***	***
Apr.-June	520	371,578	***	***	***	***	***	***
July-Sept.	552	235,559	--	0	--	***	***	***

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Table V-5—Continued
CTL plate: Weighted-average f.o.b. prices and quantities of domestic and imported product 3[1] and margins of underselling/(overselling), by quarters, January 2013-September 2016

Period	United States		Turkey		
	Price (dollars per short ton)	Quantity (short tons)	Price (dollars per short ton)	Quantity (short tons)	Margin (percent)
2013:					
Jan.-Mar.	678	374,658	***	***	***
Apr.-June	695	389,903	***	***	***
July-Sept.	676	381,901	***	***	***
Oct.-Dec.	676	386,378	***	***	***
2014:					
Jan.-Mar.	736	357,960	***	***	***
Apr.-June	765	363,441	***	***	***
July-Sept.	790	382,992	***	***	***
Oct.-Dec.	787	322,685	***	***	***
2015:					
Jan.-Mar.	706	271,375	***	***	***
Apr.-June	597	296,380	***	***	***
July-Sept.	548	278,153	***	***	***
Oct.-Dec.	477	267,427	***	***	***
2016:					
Jan.-Mar.	450	329,434	***	***	***
Apr.-June	520	371,453	***	***	***
July-Sept.	552	235,431	***	***	***

[1] Product 3: Hot-rolled CTL carbon steel plate, ASTM A-36 or equivalent as rolled, mill edge, not heat treated, not cleaned or oiled, in cut lengths, 72” through 120” in width, 0.375” through 3.00” in thickness.

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

Table V-6
CTL plate: Weighted-average f.o.b. prices and quantities of domestic and imported product 4[1] and margins of underselling/(overselling), by quarters, January 2013-September 2016

Period	United States		Belgium			Brazil		
	Price (dollars per short ton)	Quantity (short tons)	Price (dollars per short ton)	Quantity (short tons)	Margin (percent)	Price (dollars per short ton)	Quantity (short tons)	Margin (percent)
2013: Jan.-Mar.	738	130,050	--	0	--	***	***	***
Apr.-June	746	144,833	--	0	--	***	***	***
July-Sept.	726	139,685	--	0	--	***	***	***
Oct.-Dec.	739	156,324	--	0	--	***	***	***
2014: Jan.-Mar.	787	161,230	***	***	***	***	***	***
Apr.-June	804	182,069	***	***	***	***	***	***
July-Sept.	828	173,602	***	***	***	***	***	***
Oct.-Dec.	828	161,596	--	0	--	***	***	***
2015: Jan.-Mar.	772	136,626	***	***	***	***	***	***
Apr.-June	677	137,476	***	***	***	***	***	***
July-Sept.	646	140,392	***	***	***	***	***	***
Oct.-Dec.	581	112,932	--	0	--	***	***	***
2016: Jan.-Mar.	552	152,228	***	***	***	***	***	***
Apr.-June	597	163,077	***	***	***	***	***	***
July-Sept.	651	133,805	--	0	--	--	0	--

Period	United States		Italy			Japan		
2013: Jan.-Mar.	738	130,050	***	***	***	***	***	***
Apr.-June	746	144,833	***	***	***	--	0	--
July-Sept.	726	139,685	--	0	--	--	0	--
Oct.-Dec.	739	156,324	--	0	--	--	0	--
2014: Jan.-Mar.	787	161,230	--	0	--	--	0	--
Apr.-June	804	182,069	***	***	***	--	0	--
July-Sept.	828	173,602	***	***	***	***	***	***
Oct.-Dec.	828	161,596	***	***	***	***	***	***
2015: Jan.-Mar.	772	136,626	***	***	***	***	***	***
Apr.-June	677	137,476	***	***	***	***	***	***
July-Sept.	646	140,392	***	***	***	***	***	***
Oct.-Dec.	581	112,932	***	***	***	***	***	***
2016: Jan.-Mar.	552	152,228	***	***	***	***	***	***
Apr.-June	597	163,077	***	***	***	--	0	--
July-Sept.	651	133,805	--	0	--	***	***	***

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Table V-6—Continued
CTL plate: Weighted-average f.o.b. prices and quantities of domestic and imported product 4[1] and margins of underselling/(overselling), by quarters, January 2013-September 2016

Period	United States		Korea (POSCO)			South Africa		
	Price (dollars per short ton)	Quantity (short tons)	Price (dollars per short ton)	Quantity (short tons)	Margin (percent)	Price (dollars per short ton)	Quantity (short tons)	Margin (percent)
2013: Jan.-Mar.	738	130,050	***	***	***	--	0	--
Apr.-June	746	144,833	***	***	***	--	0	--
July-Sept.	726	139,685	***	***	***	--	0	--
Oct.-Dec.	739	156,324	***	***	***	***	***	***
2014: Jan.-Mar.	787	161,230	***	***	***	***	***	***
Apr.-June	804	182,069	***	***	***	***	***	***
July-Sept.	828	173,602	***	***	***	***	***	***
Oct.-Dec.	828	161,596	***	***	***	***	***	***
2015: Jan.-Mar.	772	136,626	***	***	***	--	0	--
Apr.-June	677	137,476	***	***	***	***	***	***
July-Sept.	646	140,392	***	***	***	***	***	***
Oct.-Dec.	581	112,932	***	***	***	***	***	***
2016: Jan.-Mar.	552	152,228	***	***	***	***	***	***
Apr.-June	597	163,077	***	***	***	***	***	***
July-Sept.	651	133,805	***	***	***	--	0	--

Period	United States		Taiwan			Turkey		
2013: Jan.-Mar.	738	130,050	***	***	***	--	0	--
Apr.-June	746	144,833	***	***	***	--	0	--
July-Sept.	726	139,685	***	***	***	***	***	***
Oct.-Dec.	739	156,324	***	***	***	***	***	***
2014: Jan.-Mar.	787	161,230	***	***	***	***	***	***
Apr.-June	804	182,069	***	***	***	***	***	***
July-Sept.	828	173,602	***	***	***	***	***	***
Oct.-Dec.	828	161,596	***	***	***	***	***	***
2015: Jan.-Mar.	772	136,626	***	***	***	***	***	***
Apr.-June	677	137,476	***	***	***	--	0	--
July-Sept.	646	140,392	***	***	***	--	0	--
Oct.-Dec.	581	112,932	***	***	***	***	***	***
2016: Jan.-Mar.	552	152,228	***	***	***	--	0	--
Apr.-June	597	163,077	***	***	***	***	***	***
July-Sept.	651	133,805	***	***	***	--	0	--

[1] Product 4: Hot-rolled CTL carbon steel plate, high strength low alloy (HSLA), ASTM A-572, Grade 50, mill edge, not cleaned or oiled, in cut lengths, 72" through 120" in width, 0.5" through 1.5" in thickness.

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

Table V-7
CTL plate: Weighted-average f.o.b. prices and quantities of domestic and imported product 5 and margins of underselling/(overselling), and weighted-average import cost by direct importers for internal consumption, by quarters, January 2013-September 2016

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Table V-8
CTL plate: Weighted-average f.o.b. prices and quantities of domestic and imported product 6 and margins of underselling/(overselling), by quarters, January 2013-September 2016

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Figure V-3
CTL plate: Weighted-average prices and quantities of domestic and imported product 1, by quarters, January 2013-September 2016

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Figure V-4
CTL plate: Weighted-average prices and quantities of domestic and imported product 2, by quarters, January 2013-September 2016

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Figure V-5
CTL plate: Weighted-average prices and quantities of domestic and imported product 3, by quarters, January 2013-September 2016

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Figure V-6
CTL plate: Weighted-average prices and quantities of domestic and imported product 4, by quarters, January 2013-September 2016

* * * * * * *

Figure V-7
CTL plate: Weighted-average prices and quantities of domestic and imported product 5, by quarters, January 2013-September 2016

* * * * * * *

Figure V-8
CTL plate: Weighted-average prices and quantities of domestic and imported product 6, by quarters, January 2013-September 2016

* * * * * * *

Direct import purchase costs

In addition to prices for CTL plate for the six indicated products, importers were also asked to report purchase cost data for their imports of products 5 and 6 from subject sources believed to be manufacturing and/or exporting these products. Responses were received from four importers (***) for imports from France, Germany, Japan, and Korea (POSCO) (table V-9). These data represent *** of reported imports from France, *** percent from Germany, *** percent from Japan, and *** percent from Korea (POSCO) in 2015. No importer reported purchase cost data for product 6. The purchase cost of directly imported product 5 was lower than the domestic price in 29 of 40 comparisons and for *** of *** short tons (72.5 percent of comparisons, 62.3 percent of quantity).

Table V-9
CTL plate: Weighted-average import cost by direct importers for internal consumption of product 5,[1] by quarters, January 2013-September 2016

* * * * * * *

When importers were asked about the benefits of importing CTL plate directly, a number of firms provided various availability, contractual, or technical reasons.[8] ***. Of the nine importers estimating the cost savings from importing directly, four reported no cost savings, and one each reported cost savings of 1, 5, 6, 10, and 20 percent.

[8] Although *** importers provided direct cost import data for products 5 and 6, 13 provided at least some information regarding directly importing CTL plate.

Price trends

Prices fluctuated during January 2013-September 2016. Import prices for products 1-4 also followed these general trends: fluctuating in 2013, generally increasing in most of 2014, and falling by larger amounts in 2015 before starting to recover in the second and third quarter of 2016. There was little import sales data for product 5. For imported product 6, price changes were more sporadic and variable, not displaying any specific trends across a majority of subject countries.

Across pricing products 1-4, U.S. prices did not change greatly in the first three quarters of 2013 (less than 3 percent in either direction). However, in either the fourth quarter of 2013 or the first quarter of 2014, prices rose by 4.8 to 8.9 percent. U.S. prices then rose through the third quarter of 2014 for all four products. This increase leveled out or started to slightly decline in the fourth quarter of 2014 before dropping by 4.5 to 15.4 percent each quarter for all four products, except for product 1 in the third quarter of 2015, when prices fell 1.6 percent. Prices of domestically produced product 5 increased a moderate amount in three of the first four quarters of the period, but decreased 10-20 percent three times (in the first quarter of 2015 and the first and second quarters of 2016), then increased 40 percent in the third quarter of 2016. Prices for U.S. product 6 generally fluctuated, thrice falling *** percent then recovering most of the decrease the following quarter (second halves of 2013, 2014, and 2016).[9]

Table V-10 summarizes the price trends, by country and by product. As shown in the table, domestic price decreases ranged from 11.7 to 18.6 percent across January 2013-September 2016 for products 1-4, with an increase of *** percent for product 5, and a decrease of *** percent for product 6. Import price decreases ranged from 8.3 to 45.1 percent across products 1-4. Product 5 from Japan decreased by *** percent (the only country for which there was sufficient data for a trend analysis). Product 6 imported from three of the five countries decreased by more than 10 percent, stayed nearly the same for ***, and increased by 11 percent for ***.

[9] Prices for U.S.-produced product 6 ***.

Table V-10
CTL plate: Summary of weighted-average f.o.b. prices for products 1-6 from the United States and subject countries

Item	Number of quarters	Low price (per short ton)	High price (per short ton)	Change in price[1] (percent)
Product 1				
United States	15	523	809	(11.7)
Brazil	11	***	***	***
Korea (POSCO)	15	***	***	***
Taiwan	15	***	***	***
Product 2				
United States	15	468	797	(17.3)
Korea (POSCO)	11	***	***	***
Taiwan	11	***	***	***
Product 3				
United States	15	450	790	(18.6)
Brazil	14	***	***	***
Italy	15	***	***	***
Japan	10	***	***	***
Korea (POSCO)	15	***	***	***
South Africa	10	***	***	***
Taiwan	14	***	***	***
Turkey	15	***	***	***
Product 4				
United States	15	552	828	(11.8)
Brazil	14	***	***	***
Italy	11	***	***	***
Japan	9	***	***	***
Korea (POSCO)	15	***	***	***
South Africa	10	***	***	***
Taiwan	15	***	***	***
Turkey	9	***	***	***
Product 5				
United States	15	***	***	***
Japan	3	***	***	***
Product 6				
United States	14	***	***	***
Austria	15	***	***	***
China	15	***	***	***
France	15	***	***	***
Germany	13	***	***	***
Japan	15	***	***	***

[1] Percentage change is calculated using data from the first quarter in which data were available in the first year to the last quarter in which data were available if it is among the last four quarters of the data-collection period. Subject countries for which there was insufficient data have been excluded from presentation.

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

Price comparisons

As shown in tables V-11 and V-12, prices for CTL plate imported from the subject countries were below those for U.S.-produced CTL plate in 193 of 371 instances (747,331 short tons); margins of underselling ranged from 0.0 to 28.6 percent, averaging 9.3 percent. In the remaining 178 instances (280,632 short tons), prices for CTL plate from these countries were between 0.1 and 167.1 percent above prices for the domestic product, averaging 27.3 percent higher than U.S. prices. CTL plate from subject countries had at least one quarter of underselling and one quarter of overselling U.S. prices on the pricing products with the exception of Austria.[10]

The average overselling margin for products 1-4 averaged 10.1 percent, compared with an average overselling margin of *** percent for product 5 and 57.5 percent for product 6. A similar divergence was not evident in the underselling margins. With respect to products 1-4, there were 178 instances of underselling (741,765 short tons) compared to 107 instances of overselling (262,519 short tons). For product 5 (X-70 plate), there were two instances of underselling (*** short tons) and two instances of overselling (*** short tons).[11] For product 6 (tool steel), there were 13 instances of underselling (*** short tons)[12] compared with 70 instances of overselling (*** short tons).

The proportion of quarters of underselling to quarters of overselling was highest in 2014, whether comparing product groupings 1 to 4, 1 to 5, or all six products combined on either a quantity or number of quarters basis (table V-13). For example, underselling occurred in 81.1 percent of all product 1-4 pricing comparisons in 2014 on a number of quarters basis (95.7 percent on a quantity basis), compared with 59.7 percent in 2013, 39.3 percent in 2015, and 73.5 percent in 2016. Similar shares can be computed when adding product 5 to the grouping. When combining all six products, underselling occurred in a majority of quarters only in 2014 (due to the frequency of overselling reported for product 6), though undersold quantities were greater than oversold quantities in every year but 2015.

[10] Imported product 6 from Austria did not undersell U.S. prices in any quarter.
[11] Comparisons of direct imports to U.S.-produced X-70 appear earlier in this section.
[12] Eleven of these instances were ***.

Table V-11
CTL plate: Instances of underselling and the range and average of margins, by country and product, January 2013-September 2016

Source	Underselling				
	Number of quarters	Quantity[1] (short tons)	Average margin (percent)	Margin range (percent)	
				Min	Max
Austria:					
Product 6	0	0	---	---	---
Total:	0	0	---	---	---
Belgium:					
Product 1	***	***	***	***	***
Product 3	***	***	***	***	***
Product 4	***	***	***	***	***
Total:	5	334	12.2	0.6	21.2
Brazil:					
Product 1	***	***	***	***	***
Product 2	***	***	***	***	***
Product 3	***	***	***	***	***
Product 4	***	***	***	***	***
Product 6	0	0	---	---	---
Total:	31	89,041	8.8	0.9	22.9
China:					
Product 1	0	0	---	---	---
Product 3	***	***	***	***	***
Product 6	0	0	---	---	---
Total:	***	***	***	***	***
France:					
Product 6	***	***	***	***	***
Total:	***	***	***	***	***
Germany:					
Product 5	***	***	***	***	***
Product 6	***	***	***	***	***
Total:	***	***	***	***	***
Italy:					
Product 3	***	***	***	***	***
Product 4	***	***	***	***	***
Total:	16	37,946	9.3	1.4	28.6

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Table V-11—Continued
CTL plate: Instances of underselling and the range and average of margins, by country and product, January 2013-September 2016

Source	Underselling				
	Number of quarters	Quantity[1] (short tons)	Average margin (percent)	Margin range (percent)	
				Min	Max
Japan:					
Product 1	***	***	***	***	***
Product 2	***	***	***	***	***
Product 3	***	***	***	***	***
Product 4	***	***	***	***	***
Product 5	***	***	***	***	***
Product 6	0	0	---	---	---
Total:	17	53,361	5.2	0.0	19.3
Korea (POSCO):					
Product 1	***	***	***	***	***
Product 2	***	***	***	***	***
Product 3	***	***	***	***	***
Product 4	***	***	***	***	***
Product 5	0	0	---	---	---
Product 6	***	***	***	***	***
Total:	33	342,220	9.3	0.2	27.1
South Africa:					
Product 1	***	***	***	***	***
Product 2	***	***	***	***	***
Product 3	***	***	***	***	***
Product 4	***	***	***	***	***
Total:	24	33,410	12.3	0.3	25.1
Taiwan:					
Product 1	***	***	***	***	***
Product 2	***	***	***	***	***
Product 3	***	***	***	***	***
Product 4	***	***	***	***	***
Total:	31	40,631	4.8	0.0	17.8
Turkey:					
Product 1	***	***	***	***	***
Product 2	***	***	***	***	***
Product 3	***	***	***	***	***
Product 4	***	***	***	***	***
Total:	22	146,240	11.2	0.1	27.6
Grand Total	193	747,331	9.3	0.0	28.6

[1] These data include only quarters in which there is a comparison between the U.S. and subject product.

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

Table V-12
CTL plate: Instances of overselling and the range and average of margins, by country and product, January 2013-September 2016

Source	(Overselling)				
	Number of quarters	Quantity[1] (short tons)	Average margin (percent)	Margin range (percent)	
				Min	Max
Austria:					
Product 6	***	***	***	***	***
Total:	***	***	***	***	***
Belgium:					
Product 1	***	***	***	***	***
Product 3	***	***	***	***	***
Product 4	***	***	***	***	***
Total:	10	6,023	(10.3)	(0.8)	(29.3)
Brazil:					
Product 1	***	***	***	***	***
Product 2	***	***	***	***	***
Product 3	***	***	***	***	***
Product 4	***	***	***	***	***
Product 6	***	***	***	***	***
Total:	24	24,830	(21.6)	(0.6)	(70.7)
China:					
Product 1	***	***	***	***	***
Product 3	***	***	***	***	***
Product 6	***	***	***	***	***
Total:	15	3,100	(36.8)	(5.1)	59.2
France:					
Product 6	***	***	***	***	***
Total:	***	***	***	***	***
Germany:					
Product 5	0	0	---	---	---
Product 6	***	***	***	***	***
Total:	***	***	***	***	***
Italy:					
Product 3	***	***	***	***	***
Product 4	***	***	***	***	***
Total:	10	36,257	(15.9)	(0.8)	(51.4)

Table continued on next page.

Table V-12—Continued
CTL plate: Instances of overselling and the range and average of margins, by country and product, January 2013-September 2016

Source	(Overselling)				
	Number of quarters	Quantity[1] (short tons)	Average margin (percent)	Margin range (percent)	
				Min	Max
Japan:					
Product 1	***	***	***	***	***
Product 2	***	***	***	***	***
Product 3	***	***	***	***	***
Product 4	***	***	***	***	***
Product 5	***	***	***	***	***
Product 6	***	***	***	***	***
Total:	26	40,081	(66.9)	(0.3)	(167.1)
Korea (POSCO):					
Product 1	***	***	***	***	***
Product 2	***	***	***	***	***
Product 3	***	***	***	***	***
Product 4	***	***	***	***	***
Product 5	***	***	***	***	***
Product 6	***	***	***	***	***
Total:	30	121,102	(7.9)	(0.1)	(84.8)
South Africa:					
Product 1	0	0	---	---	---
Product 2	0	0	---	---	---
Product 3	***	***	***	***	***
Product 4	0	0	---	---	---
Total:	***	***	***	***	***
Taiwan:					
Product 1	***	***	***	***	***
Product 2	***	***	***	***	***
Product 3	***	***	***	***	***
Product 4	***	***	***	***	***
Total:	24	21,507	(10.0)	(0.6)	(35.5)
Turkey:					
Product 1	0	0	---	---	---
Product 2	***	***	***	***	***
Product 3	***	***	***	***	***
Product 4	***	***	***	***	***
Total:	8	20,786	(3.4)	(0.1)	(11.1)
Grand Total	178	280,632	(28.5)	(0.1)	(167.1)

[1] These data include only quarters in which there is a comparison between the U.S. and subject product.

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

Table V-13
CTL plate: Instances of underselling and overselling, quantities undersold and oversold, and average margins, by year, January 2013-September 2016

Source	Number of quarters		Quantity[1] (short tons)		Average margin (percent)	
	Underselling	Overselling	Undersold	Oversold	Underselling	Overselling
Products 1-4:						
2013	37	25	81,429	39,919	5.3	(6.0)
2014	72	17	444,464	19,789	7.9	(5.1)
2015	33	51	126,890	172,846	6.8	(12.4)
2016	36	13	88,688	29,965	16.1	(13.8)
Subtotal	178	106	741,471	262,519	8.8	(9.9)
Product 5:						
2013	***	***	***	***	***	***
2014	***	***	***	***	***	***
2015	***	***	***	***	***	***
2016	***	***	***	***	***	***
Subtotal	***	***	***	***	***	***
Products 1-5:						
2013	***	***	***	***	***	***
2014	***	***	***	***	***	***
2015	***	***	***	***	***	***
2016	***	***	***	***	***	***
Subtotal	***	***	***	***	***	***
Product 6:						
2013	***	***	***	***	***	***
2014	***	***	***	***	***	***
2015	***	***	***	***	***	***
2016	***	***	***	***	***	***
Subtotal	***	***	***	***	***	***
Products 1-6:						
2013	43	46	82,230	43,228	6.3	(28.2)
2014	76	35	444,935	21,071	8.2	(27.4)
2015	38	69	131,422	174,309	8.1	(24.3)
2016	37	28	88,744	42,024	16.2	(41.0)
Total	193	178	747,331	280,632	9.3	(28.5)

[1] These data include only quarters in which there is a comparison between the U.S. and subject product.

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

LOST SALES AND LOST REVENUE

In the preliminary phase of the investigations, the Commission requested U.S. producers of CTL plate to report purchasers where they experienced instances of lost sales or revenue due to competition from imports of CTL plate from subject countries during January 2013-September 2016. Of the nine responding U.S. producers, five reported that they had to either reduce prices or roll back announced price increases, and six firms reported that they had lost sales. Two U.S. producers submitted lost sales and lost revenue allegations. The two responding U.S. producers identified eight firms where they lost sales or revenue (seven firms were associated with lost revenue allegations, and one was associated with both a lost sale and multiple lost revenue of allegations). These allegations covered revenues allegedly lost to seven of the 12 subject countries: Austria, Brazil, Germany, Italy, Korea, South Africa, and Turkey, and the lost sales allegation was with respect to Austria. All allegations covered a broad spectrum of types of CTL plate. In the final phase of these investigations, 13 of 16 responding U.S. producers reported that they had to reduce prices to compete for sales and 9 of 15 reported having to roll back announced price increases. Thirteen of 16 also reported that they had lost sales.

Questionnaires sent to purchasers in the final phase of these investigations contained questions that pertained to lost sales and lost revenue as well. Staff received useable responses from 87 purchasers. Responding purchasers reported purchasing 4.5 million short tons of CTL plate during 2015 (table V-14).[13]

During 2015, the responding purchasers purchased 80.1 percent of their CTL plate from U.S. producers, 9.9 percent from subject countries, 3.5 percent from nonsubject countries.[14] The five largest purchasers in 2015 bought CTL plate from domestic, subject, and nonsubject sources; among the next five largest purchasers four bought subject CTL plate and only one bought nonsubject CTL plate, although one purchaser (***) could not identify their CTL plate sources. The ten largest purchasers accounted for 65.4 percent of all reported purchases: 70.0 percent of reported purchases from domestic sources, 39.6 percent of reported purchases from subject sources, 44.0 percent of reported purchases from nonsubject sources, and 80.9 percent of purchases from unidentified sources. Further data regarding changes in purchasing patterns was presented in table II-7.

Table V-14
CTL plate: Purchasers' reported purchases, 2015, and change in domestic and subject country shares, 2013-15

* * * * * * *

[13] In the preliminary phase, staff sent requests to the eight purchasers and received responses from six purchasers. Responding purchasers reported purchasing a total of 5.8 million short tons of CTL plate during 2013-15, including 1.9 million short tons of CTL plate during 2015.

[14] Purchasers reported 6.4 percent of purchases in 2015 were from unknown sources.

Purchasers were asked a series of questions regarding their sourcing decisions for CTL plate. They were first asked whether they had purchased CTL plate from each subject country instead of U.S.-produced plate since January 1, 2013. If so, they were further asked if price was the reason that they had purchased that CTL plate and to quantify those purchases (table V-15, summarized in table V-16). Sixty-four of 82 responding purchasers noted that they had purchased plate from at least one subject country instead of domestically produced CTL plate, and 48 purchasers reported that the subject product was priced lower. Thirty-five purchasers noted the price was a primary reason for purchasing subject product instead of U.S.-produced CTL plate for at least one country.[15] In total, these purchases accounted for 618,362 short tons of CTL plate. A majority of purchasers reported price was a primary factor in their decision to purchase subject imports instead of domestic CTL plate for 8 of the subject countries. A majority of purchasers reported that, for the CTL plate they purchased from Austria, France, and Germany, price was not a primary factor in this decision. The same number of purchasers reported price was a primary factor and price was not a primary factor for their purchases of CTL plate from China.

Table V-15
CTL plate: Purchasers' responses to changing supply sources, January 2013-September 2016

* * * * * * *

Table V-16
CTL plate: Summary of purchasers' responses to changing supply sources, January 2013-September 2016

Source	Number of purchasers having purchased CTL plate from country instead of domestic CTL plate	Number of purchasers reporting price as a primary factor	Quantity of subject country purchases instead of domestic purchases due to price (short tons)	Number of purchasers reporting price as not a primary factor[1]
Austria	19	9	5,518	9
Belgium	16	12	11,351	4
Brazil	22	18	49,395	4
China	17	10	13,570	7
France	9	5	1,170	4
Germany	34	14	13,104	20
Italy	22	17	66,005	5
Japan	26	15	82,672	11
Korea (POSCO)	35	25	280,694	10
South Africa	15	12	10,786	3
Taiwan	19	17	46,756	1
Turkey	20	16	37,341	3

[1] This includes only those firms that actually purchased from the listed countries.

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

[15] Six purchasers reported that price was the primary reason for some countries from which they purchased CTL plate and not the primary reason for other countries.

Purchasers were also asked whether, in connection with a sale of offer to sell CTL plate, U.S. producers reduced their prices in order to compete with lower-priced imports from the subject countries. Purchasers reported that domestic producers did reduce prices by amounts between 2 and 50 percent (table V-17). Korea (POSCO) was most often noted by purchasers as the competing source (14 purchasers), followed by Turkey (7 purchasers); Brazil, Germany, and Japan (6 purchasers each); China, Italy, South Africa, and Taiwan (5 purchasers each); Austria and France (3 purchasers each); and Belgium (2 purchasers) (table V-18).

Table V-17
CTL plate: Purchasers' responses to U.S. producer price reductions, January 2013-September 2016

* * * * * * *

Table V-18
CTL plate: Summary of purchasers' responses to price reduction, by country, January 2013-September 2016

Source	Number of purchasers reporting U.S. producers reduced prices	Averaged estimated U.S. price reduction (percent)[1]	Range of estimated U.S. price reduction (percent)[1]
Austria	3	25.0	15.0 to 35.0
Belgium	2	25.0	15.0 to 35.0
Brazil	6	16.7	15.0 to 50.0
China	5	21.7	15.0 to 50.0
France	3	15.0	15.0 to 50.0
Germany	6	18.3	5.0 to 50.0
Italy	5	17.5	15.0 to 50.0
Japan	6	20.0	2.0 to 35.0
Korea, POSCO & affiliates	14	13.7	2.0 to 50.0
South Africa	5	17.5	15.0 to 50.0
Taiwan	5	13.3	2.0 to 50.0
Turkey	7	16.4	2.0 to 22.0

[1] If firms provided a range of price reductions, then the range was not used to determine the average price change but the range was used in the estimated range of price changes.

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

PART VI: FINANCIAL EXPERIENCE OF U.S. PRODUCERS

BACKGROUND

The financial results of *** U.S. mills and *** processors of CTL plate are presented in this section of the report.[1] With the exception of ***, U.S. producers reported their financial results on the basis of generally accepted accounting principles ("GAAP").[2] *** U.S. producers reported their full-year financial data on a calendar year basis.[3] Commercial sales account for the large majority of reported CTL plate revenue with internal consumption and transfers to related firms representing relatively small shares. Accordingly, the tables below present a combined revenue total.

Staff verified the financial results of *** with its company records. The verification adjustments were incorporated into this report.[4] The financial data of *** were changed to ***. These adjustments for *** resulted in ***.

With respect to their U.S. operations, several producers reported that they purchase inputs from related firms: ***.[5] [6]

OPERATIONS ON CTL PLATE

Table VI-1 presents aggregated data on U.S. producers' operations in relation to CTL plate during 2013-15, January-September 2015, and January-September 2016. Table VI-2 shows the changes in average unit values of select financial indicators. Table VI-3 presents selected company-specific financial data.[7]

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[1] While *** submitted U.S. producer questionnaire responses to the Commission, they did not provide useable financial results. These companies represented *** percent of total shipments by quantity in 2015. The CTL plate operations of these companies are not reflected in this section of the report, with the exception of ***.

[2] ***.

[3] *** reported their financial results on a fiscal-year basis ending ***, respectively.

[4] ***.

[5] ***. *** U.S. producer questionnaires, responses at III-7.

[6] The Commission's current practice requires that relevant cost information associated with input purchases from related suppliers correspond to the manner in which this information is reported in the U.S. producer's own accounting books and records. *See 1,1,1,2-Tetrafluorethane from China, Inv. Nos. 701-TA-509 and 731-TA-1244 (Final),* USITC Publication 4503, December 2014, pp. 23 and 37.

[7] CTL plate operations vary from company to company in terms of features such as the level of integration, steel production process, and product mix. *** of the responding companies, ***, are processors of CTL plate, which means the components of their cost of goods sold as well as certain other financial measures may vary when compared with the steel mills.

Table VI-1
CTL plate: Results of operations of U.S. producers, 2013-15, January-September 2015, and January-September 2016

Item	Fiscal year			January to September	
	2013	2014	2015	2015	2016
	Quantity (short tons)				
Total net sales	7,523,574	7,841,261	6,559,704	5,120,680	4,879,855
	Value ($1,000)				
Total net sales	5,929,345	6,698,463	4,669,052	3,785,455	2,931,153
Cost of goods sold.-- Raw materials	3,530,508	3,757,940	2,536,989	2,056,188	1,529,115
Direct labor	380,232	394,158	344,134	277,574	244,022
Other factory costs	1,719,645	1,845,456	1,567,116	1,182,204	980,001
Total COGS	5,630,385	5,997,554	4,448,239	3,515,966	2,753,138
Gross profit	298,960	700,909	220,813	269,489	178,015
SG&A expense	208,649	205,412	198,275	156,796	142,208
Operating income or (loss)	90,311	495,497	22,538	112,693	35,807
Other expense or (income), net	212,347	189,019	431,704	133,316	135,999
Net income or (loss)	***	***	***	***	***
Depreciation/amortization	222,429	226,753	211,545	159,552	157,317
Cash flow	***	***	***	***	***
	Ratio to net sales (percent)				
Cost of goods sold.-- Raw materials	59.5	56.1	54.3	54.3	52.2
Direct labor	6.4	5.9	7.4	7.3	8.3
Other factory costs	29.0	27.6	33.6	31.2	33.4
Average COGS	95.0	89.5	95.3	92.9	93.9
Gross profit	5.0	10.5	4.7	7.1	6.1
SG&A expense	3.5	3.1	4.2	4.1	4.9
Operating income or (loss)	1.5	7.4	0.5	3.0	1.2
Net income or (loss)	***	***	***	***	***

Table continued on next page.

Table VI-1—Continued
CTL plate: Results of operations of U.S. producers, 2013-15, January-September 2015, and January-September 2016

Item	Calendar year			January to September	
	2013	2014	2015	2015	2016
	Ratio to total COGS (percent)				
Cost of goods sold.-- Raw materials	62.7	62.7	57.0	58.5	55.5
Direct labor	6.8	6.6	7.7	7.9	8.9
Other factory costs	30.5	30.8	35.2	33.6	35.6
Average COGS	100.0	100.0	100.0	100.0	100.0
	Unit value (dollars per short ton)				
Total net sales	788	854	712	739	601
Cost of goods sold.-- Raw materials	469	479	387	402	313
Direct labor	51	50	52	54	50
Other factory costs	229	235	239	231	201
Average COGS	748	765	678	687	564
Gross profit	40	89	34	53	36
SG&A expense	28	26	30	31	29
Operating income or (loss)	12	63	3	22	7
Net income or (loss)	***	***	***	***	***
	Number of firms reporting				
Operating losses	3	2	6	4	2
Net losses	4	2	6	5	5
Data	12	12	12	12	12

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

Table VI-2
CTL plate: Changes in AUVs, between fiscal years and between partial year periods

Item	Between fiscal years			Between partial year periods
	2013-15	2013-14	2014-15	2015-16
Total net sales	(76)	66	(142)	(139)
Cost of goods sold.-- Raw materials	(83)	10	(92)	(88)
Direct labor	2	(0)	2	(4)
Other factory costs	10	7	4	(30)
Average COGS	(70)	17	(87)	(122)
Gross profit	(6)	50	(56)	(16)
SG&A expense	2	(2)	4	(1)
Operating income or (loss)	(9)	51	(60)	(15)
Net income or (loss)	***	***	***	***

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

Table VI-3
CTL plate: Results of operations of U.S. producers, by firm, 2013-15, January-September 2015, and January-September 2016

* * * * * * *

Net sales

As shown in table VI-1, CTL plate net sales quantity increased in 2014 and decreased in 2015, to a level 12.8 percent lower than in 2013, and was lower in January-September 2016 than in January-September 2015. The directional trend of individual firms' sales quantities were mostly uniform with eight of twelve companies reporting increasing net sales quantities from 2013 to 2014, and ten of twelve companies reporting decreasing sales from 2014 to 2015. Overall net sales values followed the same trend (increasing in 2014 and decreasing in 2015). The average net sales unit value increased from $788 per short ton in 2013 to $854 per short ton in 2014, before decreasing to $712 per short ton in 2015. The average net sales unit value in January-September 2016 was $601 compared to $739 in January-September 2015. The net sales unit values of the majority of U.S. producers had the same directional trend.[8] [9]

Cost of goods sold and gross profit or (loss)

Tables VI-1 and VI-2 show that although there was an increase in the cost of goods sold ("COGS") unit value from 2013 to 2014 (of $17 per short ton), the average net sales values increased by a greater amount ($66 per short ton), which led to higher gross profits and gross profit margins. In contrast, from 2014 to 2015, average net sales values decreased by $142 per short ton, compared to the $87 per short ton decrease in the unit value of COGS, leading to decreasing gross profits.

Raw materials were the largest component of COGS, accounting for between 55.5 percent (January-September 2016) and 62.7 percent (2013 and 2014).[10] Table VI-1 shows that the industry's per-short ton raw material cost decreased by 17.6 percent from 2013 to 2015, and was 22.0 percent lower in the first three quarters of 2016, compared to the first three quarters of 2015. As seen in table VI-3, *** U.S. producers reported a lower per-short ton raw material cost in 2015 than in 2013, and *** of 12 responding producers reported a lower per-short ton raw material cost in January-September 2016 than in January-September 2015.

The second largest component of COGS is other factory costs, which accounted for between 30.5 percent and 35.6 percent of total COGS. Company-specific average other factory costs appear to be mostly consistent with differences in their underlying operations; e.g., ***.[11]

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[8] ***.

[9] ***.

[10] ***.

[11] The only companies to report any substantial nonrecurring items in other factory costs were ***. ***. ***'s U.S. producer questionnaires, responses at III-10 and ***.

Lastly, direct labor was the smallest component of COGS, representing between 6.6 percent and 8.9 percent of total COGS. As with other factory costs, company-specific average direct labor is generally lower for processors than steel mills.[12]

Gross profit increased from $299.0 million in 2013 to $700.9 million in 2014, decreased to $220.8 million in 2015, and was lower in January-September 2016 ($178.0 million) than in January-September 2015 ($269.5 million). Three companies reported gross losses in 2015 and interim 2015, and two companies reported gross losses in interim 2016.[13] From 2013 to 2014, the increase in net sales unit value outpaced the increase in per-short ton COGS, which, coupled with an increase in net sales quantity, led to the increase in gross profit. However, from 2014 to 2015, the decrease in net sales unit value outpaced the decrease in per-short ton COGS, and along with a decrease in net sales quantity, led to a decrease in gross profit. While both net sales unit values and per-short ton COGS were lower in interim 2016, gross profit in interim 2016 was lower than in interim 2015 due to a sharper difference in the net sales unit value than in the per-short ton cost of goods sold (and therefore a lower gross profit per-short ton) coupled with a lower net sales quantity.

SG&A expenses and operating income or (loss)

The industry's SG&A expense ratio moved within a relatively narrow range, from 3.1 percent (2014) to 4.9 percent (January-September 2016). Although the total SG&A expense was at its lowest level of the calendar years in 2015 and was lower in January-September 2016 than in January-September 2015 on an absolute basis, the industry's SG&A expense ratio was at its highest full-year level in 2015 and was higher in January-September 2016 than in January-September 2015 due to the lower value of sales in these periods.

Because reported SG&A expenses remained relatively stable throughout the period examined, operating income followed the same trends as gross profit. On an overall basis, operating income increased from $90.3 million in 2013 to $495.5 million in 2014, but decreased to $22.5 million in 2015. Operating income was lower in January-September 2016 ($35.8 million) than in January-September 2015 ($112.7 million). Three firms reported operating losses in 2013, two firms reported operating losses in 2014, six firms reported operating losses in 2015, and two firms reported operating losses in January-September 2016.

[12] As mentioned previously, ***.
[13] ***.

All other expenses and net income or (loss)

Classified below the operating income level are interest expense, other expense, and other income, which are usually allocated to the product line from high levels in the corporation. In table VI-1, these items are aggregated and only the net amount is shown. The net "all other expenses" decreased in 2014 and increased *** in 2015. Interest expense was *** in 2013, $*** in 2014, and $*** in 2015, and accounted for the ***. ***. In response to questions by staff, ***.[14] ***.[15]

The large increase in all other expenses in 2015 was largely attributable to ***. The major nonrecurring items reported by ***.[16] [17] [18] On an overall basis, net income followed the same trend as gross and operating incomes (improved from 2013 to 2014, worsened from 2014 to 2015, and was worse in January-September 2016 than in January-September 2015), albeit with a larger decline in profitability in 2015 due to the ***.

Variance analysis

A variance analysis for the operations of U.S. producers of CTL plate is presented in table VI-4.[19] The information for this variance analysis is derived from table VI-1. The variance analysis shows that the decreasing operating income from 2013 to 2015 was primarily due to a negative price variance despite a positive cost/expense variance (i.e., net sales unit values decreased more than costs).

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[14] ***.

[15] ***.

[16] In response to questions by staff, ***.

***. ***. Without these adjustments, U.S. producers' net income in FY 2015 would have been ***.

[17] In 2014, ***.

[18] ***.

[19] The Commission's variance analysis is calculated in three parts: Sales variance, cost of sales variance (COGS variance), and SG&A expense variance. Each part consists of a price variance (in the case of the sales variance) or a cost or expense variance (in the case of the COGS and SG&A expense variance), and a volume variance. The sales or cost/expense variance is calculated as the change in unit price or per-unit cost/expense times the new volume, while the volume variance is calculated as the change in volume times the old unit price or per-unit cost/expense. Summarized at the bottom of the table, the price variance is from sales; the cost/expense variance is the sum of those items from COGS and SG&A variances, respectively, and the volume variance is the sum of the volume components of the net sales, COGS, and SG&A expense variances. The overall volume component of the variance analysis is generally small.

Table VI-4
CTL plate: Variance analysis on the operations of U.S. producers, between fiscal years and between partial year periods

Item	Between fiscal years			Between partial year periods
	2013-15	2013-14	2014-15	2015-16
Net sales:				
Price variance	(500,665)	518,748	(934,630)	(676,272)
Volume variance	(759,628)	250,370	(1,094,781)	(178,030)
Net sales variance	(1,260,293)	769,118	(2,029,411)	(854,302)
COGS:				
Price variance	460,819	(129,423)	569,089	597,473
Volume variance	721,327	(237,746)	980,226	165,355
COGS variance	1,182,146	(367,169)	1,549,315	762,828
Gross profit variance	(78,147)	401,949	(480,096)	(91,474)
SG&A expenses:				
Cost/expense variance	(16,357)	12,047	(26,435)	7,214
Volume variance	26,731	(8,810)	33,572	7,374
Total SG&A expense variance	10,374	3,237	7,137	14,588
Operating income variance	(67,773)	405,186	(472,959)	(76,886)
Summarized (at the operating income level) as:				
Price variance	(500,665)	518,748	(934,630)	(676,272)
Net cost/expense variance	444,462	(117,376)	542,654	604,686
Net volume variance	(11,570)	3,813	(80,983)	(5,300)
Financial expenses:				
Cost/expense variance	(246,561)	32,294	(273,578)	(8,953)
Volume variance	27,204	(8,966)	30,893	6,270
Total SG&A expense variance	(219,357)	23,328	(242,685)	(2,683)
Net income variance	***	***	***	***
Summarized (at the net income level) as:				
Price variance	***	***	***	***
Net cost/expense variance	***	***	***	***
Net volume variance	***	***	***	***

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

CAPITAL EXPENDITURES AND RESEARCH AND DEVELOPMENT EXPENSES

Table VI-5 presents capital expenditures and research and development ("R&D") expenses by firm. Capital expenditures increased in 2014 and decreased in 2015. ***.[20]

Table VI-5
CTL plate: Capital expenditures and research and development expenses of U.S. producers, 2013-15, January-September 2015, and January-September 2016

* * * * * * *

Note.—Industry-wide capital expenditures appear in table C-1.

ASSETS AND RETURN ON INVESTMENT

Table VI-6 presents data on the U.S. producers' total assets, their return on assets (operating income divided by net assets), and their asset turnover ratio (net sales divided by net assets).[21] As reported by the U.S. industry, total assets decreased from $7.3 billion in 2013 to $6.4 billion in 2015. The majority of the decrease in net assets from 2013 to 2015 is attributable to ***.

[20] ***.

[21] With respect to a company's overall operations, staff notes that a total asset value (i.e., the bottom line number on the asset side of a company's balance sheet) reflects an aggregation of a number of assets which are generally not product specific. Accordingly, high-level allocation factors were required in order to report a total asset value for CTL plate.

Table VI-6
CTL plate: U.S. producers' total assets and return on assets, 2013-15

Firm	Fiscal years		
	2013	2014	2015
	Total net assets ($1,000)		
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
Total net assets	7,279,705	7,244,773	6,352,559
	Operating return on assets (percent)		
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
Average operating return on assets	1.2	6.8	0.4
	Asset turnover ratio (multiple)		
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
Average asset turnover	0.8	0.9	0.7

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

CAPITAL AND INVESTMENT

The Commission requested U.S. producers of CTL plate to describe any actual or potential negative effects of imports of CTL plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, or Turkey on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table VI-7 presents the number of firms reporting an impact in each category, while table VI-8 provides the narrative responses.[22] [23] Eleven of 16 U.S. producers responded "yes" to negative effects on investment by imports, eight of 16 responded "yes" to negative effects on growth and development, and 15 of 19 responded "yes" to anticipated negative effects.

Table VI-7
CTL plate: Actual and anticipated negative effects of imports on investment and growth and development

Item	No	Yes
Negative effects on investment	5	11
Cancellation, postponement, or rejection of expansion projects		4
Denial or rejection of investment proposal		0
Reduction in the size of capital investments		5
Return on specific investments negatively impacted		4
Other		4
Negative effects on growth and development	8	8
Rejection of bank loans		1
Lowering of credit rating		4
Problem related to the issue of stocks or bonds		2
Ability to service debt		5
Other		6
Anticipated negative effects of imports	4	15

Note.— ***.

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

[22] ***.

[23] As mentioned previously, certain processors did not provide financial data and are not included in this section of the report, however some of these companies provided responses to the questions regarding actual or potential negative effects of imports of the subject merchandise and have been included in tables VI-7 and VI-8. Specifically, ***.

Table VI-8
CTL plate: Narratives relating to actual and anticipated negative effects of imports on investment and growth and development, since January 1, 2013

* * * * * * *

PART VII: THREAT CONSIDERATIONS AND INFORMATION ON NONSUBJECT COUNTRIES

Section 771(7)(F)(i) of the Act (19 U.S.C. § 1677(7)(F)(i)) provides that—

> *In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors*[1]*--*
>
> *(I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,*
>
> *(II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,*
>
> *(III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,*
>
> *(IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports,*
>
> *(V) inventories of the subject merchandise,*

[1] Section 771(7)(F)(ii) of the Act (19 U.S.C. § 1677(7)(F)(ii)) provides that "The Commission shall consider {these factors} . . . as a whole in making a determination of whether further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted under this title. The presence or absence of any factor which the Commission is required to consider . . . shall not necessarily give decisive guidance with respect to the determination. Such a determination may not be made on the basis of mere conjecture or supposition."

(VI) the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products,

(VII) in any investigation under this title which involves imports of both a raw agricultural product (within the meaning of paragraph (4)(E)(iv)) and any product processed from such raw agricultural product, the likelihood that there will be increased imports, by reason of product shifting, if there is an affirmative determination by the Commission under section 705(b)(1) or 735(b)(1) with respect to either the raw agricultural product or the processed agricultural product (but not both),

(VIII) the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and

(IX) any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).[2]

Information on the nature of the subsidies was presented earlier in this report; information on the volume and pricing of imports of the subject merchandise is presented in *Parts IV* and *V*; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in *Part VI*. Information on inventories of the subject merchandise; foreign producers' operations, including the potential for "product-shifting;" any other threat indicators, if applicable; and any dumping in third-country markets, follows. Also presented in this section of the report is information obtained for consideration by the Commission on nonsubject countries.

[2] Section 771(7)(F)(iii) of the Act (19 U.S.C. § 1677(7)(F)(iii)) further provides that, in antidumping investigations, ". . . the Commission shall consider whether dumping in the markets of foreign countries (as evidenced by dumping findings or antidumping remedies in other WTO member markets against the same class or kind of merchandise manufactured or exported by the same party as under investigation) suggests a threat of material injury to the domestic industry."

THE INDUSTRY IN AUSTRIA

Overview

The Commission issued a foreign producers' or exporters' questionnaire to nine firms believed to produce and/or export the vast majority of CTL plate from Austria.[3] The Commission received responses from three firms: Boehler Bleche, Böhler Edelstahl, and voestalpine. These firms' exports to the United States accounted for *** of U.S. imports of CTL plate from Austria in 2015.[4] According to estimates requested of the responding Austrian producers, the production of CTL plate in Austria reported in questionnaire responses accounted for *** production of CTL plate in Austria in 2015. Table VII-1 presents information on the CTL plate operations of the responding producers and exporters in Austria. Only Boehler Bleche reported changes in operations by ***.

Table VII-1
CTL plate: Data for producers in Austria, 2015

* * * * * * *

Operations on CTL plate

Table VII-2 presents information on the CTL plate operations of the responding Austrian producers and exporters for 2013-15, January to September 2015, January to September 2016, as well as projections for 2016-17.[5] Projections indicate that capacity and inventories will increase overall, while production and inventories will fluctuate during 2016-17.

Table VII-2
CTL plate: Data on the industry in Austria, 2013-15, January to September 2015, January to September 2016, and projection calendar years 2016-17

* * * * * * *

Austrian capacity for CTL plate increased by *** percent from 2013 to 2014, decreased *** from 2014 to 2015, and was *** percent lower during January to September 2016 than during January to September 2015. Production increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, but was *** percent higher during January to September 2016 than during January to September 2015. Similarly, capacity utilization increased by *** percentage points from 2013 to 2014, decreased by *** percentage points

[3] These firms were identified through a review of information submitted in the petition and contained in proprietary Customs records.

[4] The coverage estimates presented are based on official import statistics.

[5] Data on the tool steel industry as defined in the HTSUS in Austria are presented in app. H. Tool steel producers in Austria provided data on tool steel as defined in the HTSUS as well as data on tool steel combined with mold steel.

from 2014 to 2015, but was *** percentage points higher during January to September 2016 than during January to September 2015.[6] Voestalpine began production in August 2016 for the largest pipeline plate order in the firm's history to supply plate for pipe for use in a gas pipeline project in Eastern Europe called Nord Stream 2. Voestalpine will be supplying over *** tons of CTL plate for the project through February 2018. Therefore, capacity utilization is projected to be very high during 2016-17.[7] In addition, end-of-period inventories increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, but were *** percent higher during January to September 2016 than during January to September 2015.

Total shipments of the responding Austrian producers increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, but were *** percent higher during January to September 2016 than during January to September 2015. Home market shipments declined from *** percent of total shipments in 2013 to *** percent of total shipments in 2014, but increased to *** percent of total shipments in 2015. Home market shipments of the responding Austrian producers accounted for *** percent of total shipments during January to September 2016, up from *** percent of total shipments during January to September 2015.

Exports of CTL plate to the United States decreased by *** percent from 2013 to 2015, but were *** percent higher during January to September 2016 than during January to September 2015. As a share of the responding Austrian producers' total shipments, exports to the United States decreased from *** percent in 2013 to *** percent in 2015, but were *** percent of total shipments during January to September 2016 as compared to *** percent of total shipments during January to September 2015.[8] Exports of CTL plate to countries other than the United States accounted for *** of total shipments, increasing by *** percent from 2013 to 2014, decreasing by *** percent from 2014 to 2015, and were *** percent lower during January to September 2016 than during January to September 2015. Other export markets identified include ***.

Alternative products

The responding Austrian producers produced both subject CTL plate and out-of-scope products on the same equipment as shown in table VII-3. Overall capacity utilization increased from *** percent in 2013 to *** percent in 2014, decreased to *** percent in 2015, but was *** percentage points higher during January to September 2016 than during January to September 2015. Production of subject CTL plate accounted for *** percent of total production on the same equipment and out-of-scope production accounted for *** percent in 2015. The Austrian producers reported ***. Other products produced on the same equipment as CTL plate include ***.

---

[6] *** both noted that ***. ***.

[7] ***; voestalpine's prehearing brief, pp. 23-24; voestalpine's posthearing brief, p. 10.

[8] Böhler Edelstahl and voestalpine ***. ***.

Table VII-3
CTL plate: Austrian producers' overall capacity and production on the same equipment as subject production, 2013-15, January to September 2015, and January to September 2016

* * * * * * *

Exports

According to GTA, the top export market for CTL plate from Austria was Germany in 2015 (table VII-4). India was the second-largest export destination of CTL plate from Austria. During 2015, Germany and India accounted for 25.2 and 12.4 percent of total exports from Austria of CTL plate, respectively.

Table VII-4
CTL plate: Austria's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Quantity (short tons)		
Austria's exports to the United States	50,581	49,533	12,810
Austria's exports to other major destination markets.--Germany	257,604	228,770	247,028
India	67,220	7,153	121,461
Brazil	11,990	73,268	95,324
Czech Republic	60,739	63,069	84,836
Italy	45,719	50,821	53,525
Hungary	35,255	42,147	44,458
Netherlands	32,392	35,524	33,969
Denmark	4,558	11,392	28,032
All other destination markets	307,252	452,424	257,344
Total exports from Austria	873,312	1,014,102	978,787
	Value (1,000 dollars)		
Austria's exports to the United States	50,987	47,919	18,002
Austria's exports to other major destination markets.--Germany	223,960	188,931	162,922
India	49,893	10,944	68,724
Brazil	10,825	52,266	60,769
Czech Republic	53,368	51,444	53,711
Italy	43,878	47,679	42,338
Hungary	28,335	28,072	24,514
Netherlands	25,833	29,074	22,178
Denmark	3,857	7,966	15,866
All other destination markets	287,767	380,766	201,121
Total exports from Austria	778,703	845,061	670,145

Table continued on next page.

Table VII-4—Continued
CTL plate: Austria's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Unit value (dollars per short ton)		
Austria's exports to the United States	1,008	967	1,405
Austria's exports to other major destination markets.--			
Germany	869	826	660
India	742	1,530	566
Brazil	903	713	637
Czech Republic	879	816	633
Italy	960	938	791
Hungary	804	666	551
Netherlands	798	818	653
Denmark	846	699	566
All other destination markets	937	842	782
Total exports from Austria	892	833	685
	Share of quantity (percent)		
Austria's exports to the United States	5.8	4.9	1.3
Austria's exports to other major destination markets.--			
Germany	29.5	22.6	25.2
India	7.7	0.7	12.4
Brazil	1.4	7.2	9.7
Czech Republic	7.0	6.2	8.7
Italy	5.2	5.0	5.5
Hungary	4.0	4.2	4.5
Netherlands	3.7	3.5	3.5
Denmark	0.5	1.1	2.9
All other destination markets	35.2	44.6	26.3
Total exports from Austria	100.0	100.0	100.0

Source: Official Austrian export statistics under HTS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91 as reported by Eurostat in the GTIS/GTA database, accessed October 14, 2016.

THE INDUSTRY IN BELGIUM

Overview

The Commission issued foreign producers' or exporters' questionnaires to 10 firms believed to produce and/or export CTL plate from Belgium.[9] Useable responses to the Commission's questionnaire were received from two firms: ArcelorMittal (BE) and NLMK Plates. These firms' exports to the United States accounted for *** U.S. imports of CTL plate from Belgium in 2015.[10] According to estimates requested of the responding Belgian producers, the

[9] These firms were identified through a review of information submitted in the petition and contained in proprietary Customs records.

[10] The coverage estimates presented are based on official import statistics.

production of CTL plate in Belgium reported in questionnaire responses accounted for approximately *** of overall production of CTL plate in Belgium in 2015. Table VII-5 presents information on the CTL plate operations of the responding producers and exporters in Belgium. No responding firm reported any changes in operations since January 1, 2013.

Table VII-5
CTL plate: Data for producers in Belgium, 2015

* * * * * * *

Operations on CTL plate

Table VII-6 presents information on the CTL plate operations of the responding Belgian producers and exporters for 2013-15, January to September 2015, January to September 2016, as well as projections for 2016-17. Projections indicate that production and shipments will increase, inventories will decrease, and capacity will remain the same during 2016-17.

Table VII-6
CTL plate: Data on the industry in Belgium, 2013-15, January to September 2015, January to September 2016, and projections, 2016-17

* * * * * * *

Belgian capacity for CTL plate *** from 2013 to 2015. Capacity also *** during January to September 2016 as compared to January to September 2015. Production increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, but was *** percent higher during January to September 2016 than during January to September 2015.[11] Capacity utilization increased by *** percentage points from 2013 to 2014, decreased by *** percentage points from 2014 to 2015, but was *** percentage points higher during January to September 2016 than during January to September 2015. In addition, end-of-period inventories increased by *** percent from 2013 to 2015, but were *** percent lower during January to September 2016 than during January to September 2015.

Total shipments of the responding Belgian producers increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, and were *** percent higher during January to September 2016 than during January to September 2015. Home market shipments declined from *** percent of total shipments in 2013 to *** percent of total shipments in 2015. Home market shipments by the responding Belgian producers accounted for *** percent of total shipments during January-September 2016, down from *** percent during January to September 2015.

Exports of CTL plate to the United States increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, but were *** percent higher during January to

[11] ***. Tool steel respondents' porehearing brief, p. 73.

September 2016 than during January to September 2015.[12] Exports to the United States increased by *** percent between 2013 and 2015. Belgian producers projected that exports to the United States will further increase during 2016-17. As a share of the responding Belgian producers' total shipments, exports to the United States increased from *** percent in 2013 to *** percent in 2014, decreased to *** percent 2015, and were *** percent during January-September 2016 as compared to *** percent during January-September 2015. Exports of CTL plate to countries other than the United States accounted for *** of total shipments during 2013-15, increasing by *** percent during 2013-15, and were *** percent higher during January-September 2016 than during January-September 2015. Other export markets identified include ***.

Alternative products

The responding Belgian producers produced both subject CTL plate and out-of-scope products on the same equipment as shown in table VII-7. Overall capacity utilization increased from *** percent in 2013 to *** percent in 2014, decreased to *** percent in 2015, but was *** percentage points higher during January to September 2016 than during January to September 2015. Production of subject CTL plate accounted for *** percent of total production on the same equipment and out-of-scope production accounted for *** percent in 2015. ***. Other products produced on the same equipment as CTL plate include ***.

Table VII-7
CTL plate: Belgian producers' overall capacity and production on the same equipment as subject production, 2013-15, January to September 2015, and January to September 2016

* * * * * * *

Exports

According to GTA, the top export market for CTL plate from Belgium was Germany in 2015 (table VII-8). The Netherlands was the second-largest export destination of CTL plate from Belgium. During 2015, Germany and the Netherlands accounted for 33.7 and 17.2 percent of total exports from Belgium of CTL plate, respectively.

[12] The fluctuation in exports of CTL plate to the United States is due to ***. ***.

Table VII-8
CTL plate: Belgium's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Quantity (short tons)		
Belgium's exports to the United States	26,685	62,098	27,287
Belgium's exports to other major destination markets.--			
Germany	334,870	372,010	507,958
Netherlands	233,255	222,856	259,111
France	238,344	236,703	258,118
Italy	30,942	33,281	41,192
Poland	20,461	21,677	32,255
Spain	23,517	20,524	29,410
United Arab Emirates	13,751	24,392	27,319
Korea	22,163	50,331	26,212
All other destination markets	306,864	283,697	297,858
Total exports from Belgium	1,250,852	1,327,569	1,506,719
	Value (1,000 dollars)		
Belgium's exports to the United States	30,735	59,953	25,824
Belgium's exports to other major destination markets.--			
Germany	269,919	275,804	294,525
Netherlands	178,442	162,429	144,779
France	202,419	182,629	157,281
Italy	36,335	38,480	37,767
Poland	14,860	14,005	16,361
Spain	21,448	20,643	22,292
United Arab Emirates	15,528	21,640	19,502
Korea	39,300	88,664	32,958
All other destination markets	340,282	296,211	259,353
Total exports from Belgium	1,149,268	1,160,457	1,010,642

Table continued on next page.

Table VII-8—Continued
CTL plate: Belgium's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Unit value (dollars per short ton)		
Belgium's exports to the United States	1,152	965	946
Belgium's exports to other major destination markets.--			
Germany	806	741	580
Netherlands	765	729	559
France	849	772	609
Italy	1,174	1,156	917
Poland	726	646	507
Spain	912	1,006	758
United Arab Emirates	1,129	887	714
Korea	1,773	1,762	1,257
All other destination markets	1,109	1,044	871
Total exports from Belgium	919	874	671
	Share of quantity (percent)		
Belgium's exports to the United States	2.1	4.7	1.8
Belgium's exports to other major destination markets.--			
Germany	26.8	28.0	33.7
Netherlands	18.6	16.8	17.2
France	19.1	17.8	17.1
Italy	2.5	2.5	2.7
Poland	1.6	1.6	2.1
Spain	1.9	1.5	2.0
United Arab Emirates	1.1	1.8	1.8
Korea	1.8	3.8	1.7
All other destination markets	24.5	21.4	19.8
Total exports from Belgium	100.0	100.0	100.0

Source: Official Belgian export statistics under HTS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91 as reported by Eurostat in the GTIS/GTA database, accessed October 14, 2016.

THE INDUSTRY IN BRAZIL

Overview

The Commission issued foreign producers' or exporters' questionnaires to seven firms believed to produce and/or export CTL plate from Brazil.[13] Useable responses to the Commission's questionnaire were received from three firms: Gerdau Açominas, Usiminas, and Villares. These firms' exports to the United States accounted for approximately *** percent of

[13] These firms were identified through a review of information submitted in the petition and contained in proprietary Customs records.

U.S. imports of CTL plate from Brazil in 2015.[14] According to estimates requested of the responding Brazilian producers, the production of CTL plate in Brazil reported in questionnaire responses accounted for *** production of CTL plate in Brazil in 2015.[15] Table VII-9 presents information on the CTL plate operations of the responding producers and exporters in Brazil.

Table VII-9
CTL plate: Data for producers in Brazil, 2015

* * * * * * *

Changes in operations

As presented in table VII-10, responding Brazilian producers reported operational changes since January 1, 2013.

Table VII-10
CTL plate: Reported changes in operations by firms in Brazil since January 1, 2013

* * * * * * *

Operations on CTL plate

Table VII-11 presents information on the CTL plate operations of the responding Brazilian producers and exporters for 2013-15, January to September 2015, January to September 2016, as well as projections for 2016-17.[16] Projections indicate that production will increase while capacity, shipments, and inventories will fluctuate during 2016-17.[17]

Table VII-11
CTL plate: Data on the industry in Brazil, 2013-15, January to September 2015, January to September 2016, and projections, 2016-17

* * * * * * *

Brazilian capacity for CTL plate *** from 2013 to 2015, but was *** percent lower during January to September 2016 than during January to September 2015. Production decreased by *** percent from 2013 to 2015, and was *** percent lower during January to September 2016 than during January to September 2015. Capacity utilization decreased by ***

[14] The coverage estimates presented are based on official import statistics.

[15] *** accounts for the vast majority of CTL plate production in Brazil. ***.

[16] Data on the tool steel industry as defined in the HTSUS in Brazil are presented in app. H. Tool steel producers in Brazil provided data on tool steel as defined in the HTSUS as well as data on tool steel combined with mold steel.

[17] Capacity, production, and shipments are projected to increase in 2017 due to ***.

percentage points from 2013 to 2015, and was *** percentage points lower during January to September 2016 than during January to September 2015. In addition, end-of-period inventories decreased by *** percent from 2013 to 2015, and were *** percent lower during January to September 2016 than during January to September 2015.

Total shipments of the responding Brazilian producers decreased by *** percent from 2013 to 2015, and were *** percent lower during January to September 2016 than during January to September 2015. Home market shipments accounted for the *** of total Brazilian shipments, declining from *** percent of total shipments in 2013 to *** percent of total shipments in 2014 but increased to *** percent of total shipments in 2015. Home market shipments by the responding Brazilian producers accounted for *** percent of total shipments during January to September 2016, up from *** percent of total shipments during January to September 2015.

Exports of CTL plate to the United States increased by *** percent from 2013 to 2014, decreased by *** percent during 2014 to 2015, and were *** percent lower during January to September 2016 than during January to September 2015.[18] Exports to the United States increased overall by *** percent from 2013 to 2015. Brazilian producers projected that exports to the United States will be reduced to *** during 2016-17.[19] As a share of the responding Brazilian producers' total shipments, exports to the United States increased from *** percent in 2013 to *** percent in 2014 but decreased to *** percent 2015, and were *** percent during January to September 2016 as compared to *** percent during January to September 2015. Exports of CTL plate to countries other than the United States increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, and were *** percent lower during January to September 2016 than during January to September 2015. Other export markets identified include ***.

Alternative products

*** produced both subject CTL plate and out-of-scope products on the same equipment as shown in table VII-12. Overall capacity utilization decreased from *** percent in 2013 to *** percent in 2015, and was *** percentage points lower during January to September 2016 than during January to September 2015. Production of subject CTL plate accounted for *** percent of total production on the same equipment and out-of-scope production accounted for *** percent in 2015. ***. Other products produced on the same equipment as CTL plate include ***.

Table VII-12
CTL plate: Brazilian producers' overall capacity and production on the same equipment as subject production, 2013-15, January to September 2015, and January to September 2016

* * * * * * *

[18] The increase in exports to the United States in 2014 is reportedly due to ***. ***.
[19] Usiminas ***. ***.

Exports

According to GTA, the top export market for CTL plate from Brazil was the United States in 2015 (table VII-13). Argentina was the second-largest export destination of CTL plate from Brazil. During 2015, the United States and Argentina accounted for 26.0 and 21.8 percent of total exports from Brazil of CTL plate, respectively.

Table VII-13
CTL plate: Brazil's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Quantity (short tons)		
Brazil's exports to the United States	36,932	129,757	36,033
Brazil's exports to other major destination markets.--Argentina	39,007	45,027	30,235
Taiwan	21,095	36,074	29,621
Vietnam	4,907	1,702	25,374
Paraguay	6,762	6,026	5,712
Belgium	0	0	3,349
Bolivia	1,356	4,032	2,130
Chile	3,882	947	1,423
Uruguay	3,420	1,222	1,093
All other destination markets	55,260	80,072	3,501
Total exports from Brazil	172,622	304,860	138,472
	Value (1,000 dollars)		
Brazil's exports to the United States	28,407	86,656	21,558
Brazil's exports to other major destination markets.--Argentina	35,120	40,624	24,618
Taiwan	8,480	14,039	8,582
Vietnam	1,915	649	5,871
Paraguay	4,701	4,253	3,584
Belgium	0	0	1,393
Bolivia	1,009	2,813	1,491
Chile	2,323	680	611
Uruguay	2,484	1,056	721
All other destination markets	42,686	70,724	2,704
Total exports from Brazil	127,124	221,494	71,133

Table continued on next page.

Table VII-13—Continued
CTL plate: Brazil's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Unit value (dollars per short ton)		
Brazil's exports to the United States	769	668	598
Brazil's exports to other major destination markets.--			
Argentina	900	902	814
Taiwan	402	389	290
Vietnam	390	381	231
Paraguay	695	706	627
Belgium	0	0	416
Bolivia	744	698	700
Chile	598	718	429
Uruguay	726	863	660
All other destination markets	772	883	772
Total exports from Brazil	736	727	514
	Share of quantity (percent)		
Brazil's exports to the United States	21.4	42.6	26.0
Brazil's exports to other major destination markets.--			
Argentina	22.6	14.8	21.8
Taiwan	12.2	11.8	21.4
Vietnam	2.8	0.6	18.3
Paraguay	3.9	2.0	4.1
Belgium	0.0	0.0	2.4
Bolivia	0.8	1.3	1.5
Chile	2.2	0.3	1.0
Uruguay	2.0	0.4	0.8
All other destination markets	32.0	26.3	2.5
Total exports from Brazil	100.0	100.0	100.0

Source: Official Brazil export statistics under HTS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91 as reported by SECEX - Foreign Trade Secretariat in the GTIS/GTA database, accessed October 14, 2016.

THE INDUSTRY IN CHINA

Overview

The Commission issued foreign producers' or exporters' questionnaires to 70 firms believed to produce and/or export CTL plate from China.[20] Useable responses to the Commission's questionnaire were received from one firm: Jiangyin Xingcheng. This firm's exports to the United States accounted for approximately *** percent of U.S. imports of CTL

[20] These firms were identified through a review of information submitted in the petition and contained in proprietary Customs records.

plate from China in 2015.[21] According to estimates requested of the responding Chinese producer, the production of CTL plate in China reported in the questionnaire response accounted for approximately *** percent of overall production of CTL plate in China in 2015. According to ***, total capacity of reversing mill plate in China was *** short tons and production was *** short tons in 2015, resulting in a capacity utilization of *** percent.[22] Table VII-14 presents information on the CTL plate operations of the responding producer and exporter in China. The responding firm ***.

Table VII-14
CTL plate: Data for the producer in China, 2015

* * * * * * *

Operations on CTL plate

Table VII-15 presents information on the CTL plate operations of the responding Chinese producer and exporter for 2013-15, January to September 2015, January to September 2016, as well as projections for 2016-17. Projections indicate that production, shipments, and inventories will increase, while capacity will remain the same.

Table VII-15
CTL plate: Data on Chinese producer Jiangyin Xingcheng, 2013-15, January to September 2015, January to September 2016, and projections, 2016-17

* * * * * * *

Chinese producer Jiangyin Xingcheng's capacity for CTL plate *** from 2013 to 2015. Capacity also *** during January to September 2016 as compared to January to September 2015. Production increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, but was *** percent higher during January to September 2016 than during January to September 2015. Capacity utilization increased by *** percentage points from 2013 to 2014, decreased by *** percentage points from 2014 to 2015, but was *** percentage points higher during January to September 2016 than during January to September 2015. In addition, end-of-period inventories decreased by *** percent during 2013 to 2015, and were *** percent lower during January to September 2016 than during January to September 2015.

Total shipments of CTL plate by Chinese producer Jiangyin Xingcheng increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, but were *** percent higher during January to September 2016 than during January to September 2015. Home market shipments accounted for *** of total Chinese shipments, decreasing from *** percent of total shipments in 2013 to *** percent of total shipments in 2015. Home market shipments by the responding Chinese producer accounted for *** percent of total shipments during

[21] The coverage estimates presented are based on official import statistics.
[22] ***. ***.

January to September 2016, down from *** percent of total shipments during January to September 2015.

Exports of CTL plate to the United States by Chinese producer Jiangyin Xingcheng increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, and were *** percent lower during January to September 2016 than during January to September 2015.[23] Exports to the United States increased overall by *** percent from 2013 to 2015. The Chinese producer projected that exports to the United States will be reduced to *** during 2016-17.[24] As a share of the responding Chinese producers' total shipments, exports to the United States increased from *** percent in 2013 to *** percent in 2014, decreased to *** in 2015, and were *** percentage points lower during January to September 2016 than during January to September 2015. Exports of CTL plate to countries other than the United States increased by *** percent from 2013 to 2014, decreased by *** percent during 2014 to 2015, but were *** percent higher during January to September 2016 than during January to September 2015. Other export markets identified include ***.

Alternative products

Jiangyin Xingcheng ***. Overall capacity utilization increased from *** percent in 2013 to *** percent in 2014, decreased to *** percent in 2015, but was *** percentage points higher during January to September 2016 than during January to September 2015. Production of subject CTL plate accounted for *** percent of total production on the same equipment and out-of-scope production accounted for *** percent in 2015. Other products produced on the same equipment as CTL plate include ***. ***.

Table VII-16
CTL plate: Chinese producer Jiangyin Xingcheng's overall capacity and production on the same equipment as subject production, 2013-15, January to September 2015, and January to September 2016

* * * * * * *

Exports

According to GTA, the top export market for CTL plate from China was Vietnam in 2015 (table VII-17). Korea was the second-largest export destination of CTL plate from China. During 2015, Vietnam and Korea accounted for 19.3 and 10.5 percent of total exports from China of CTL plate, respectively.

[23] Jiangyin Xingcheng noted that ***. ***.
[24] Jiangyin Xingcheng noted that ***. ***.

Table VII-17
CTL plate: China's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Quantity (short tons)		
China's exports to the United States	37,037	65,441	60,262
China's exports to other major destination markets.-- Vietnam	553,234	1,057,815	1,582,733
Korea	1,054,594	1,224,526	864,793
Japan	73,095	472,760	429,503
United Arab Emirates	174,269	397,137	426,240
India	111,720	592,316	379,971
Italy	25,789	247,878	370,722
Spain	138,006	340,992	334,766
Philippines	208,219	292,480	299,407
All other destination markets	2,122,550	2,956,802	3,471,008
Total exports from China	4,498,512	7,648,148	8,219,405
	Value (1,000 dollars)		
China's exports to the United States	46,035	63,282	42,923
China's exports to other major destination markets.-- Vietnam	275,864	492,929	519,644
Korea	522,974	579,281	301,068
Japan	35,228	220,039	138,692
United Arab Emirates	87,666	191,077	149,655
India	60,129	328,390	152,112
Italy	15,923	124,523	136,536
Spain	71,026	168,018	121,685
Philippines	103,521	136,302	109,526
All other destination markets	1,247,128	1,546,473	1,426,515
Total exports from China	2,465,493	3,850,315	3,098,357

Table continued on next page.

Table VII-17—Continued
CTL plate: China's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Unit value (dollars per short ton)		
China's exports to the United States	1,243	967	712
China's exports to other major destination markets.--			
Vietnam	499	466	328
Korea	496	473	348
Japan	482	465	323
United Arab Emirates	503	481	351
India	538	554	400
Italy	617	502	368
Spain	515	493	363
Philippines	497	466	366
All other destination markets	588	523	411
Total exports from China	548	503	377
	Share of quantity (percent)		
China's exports to the United States	0.8	0.9	0.7
China's exports to other major destination markets.--			
Vietnam	12.3	13.8	19.3
Korea	23.4	16.0	10.5
Japan	1.6	6.2	5.2
United Arab Emirates	3.9	5.2	5.2
India	2.5	7.7	4.6
Italy	0.6	3.2	4.5
Spain	3.1	4.5	4.1
Philippines	4.6	3.8	3.6
All other destination markets	47.2	38.7	42.2
Total exports from China	100.0	100.0	100.0

Source: Official Chinese export statistics under HTS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91 as reported by China Customs in the GTIS/GTA database, accessed October 14, 2016.

THE INDUSTRY IN FRANCE

Overview

The Commission issued foreign producers' or exporters' questionnaires to 13 firms believed to produce and/or export CTL plate from France.[25] Useable responses to the Commission's questionnaire were received from three firms: ArcelorMittal (FR), Dillinger France, and Entrepose. These firms' exports to the United States accounted for *** U.S. imports of CTL plate from France in 2015.[26] According to estimates requested of the responding

[25] These firms were identified through a review of information submitted in the petition and contained in proprietary Customs records.

[26] The coverage estimates presented are based on official import statistics.

French producers, the production of CTL plate in France reported in questionnaire responses accounted for approximately *** percent of overall production of CTL plate in France in 2015. Table VII-18 presents information on the CTL plate operations of the responding producers and exporters in France. No responding firm reported changes in operations since January 1, 2013.

Table VII-18
CTL plate: Data for producers in France, 2015

* * * * * * *

Operations on CTL plate

Table VII-19 presents information on the CTL plate operations of the responding French producers and exporters for 2013-15, January to September 2015, January to September 2016, as well as projections for 2016-17.[27] Projections indicate that production and shipments will increase, capacity will decrease, and inventories will fluctuate during 2016-17.

Table VII-19
CTL plate: Data on the industry in France, 2013-15, January to September 2015, January to September 2016, and projections, 2016-17

* * * * * * *

French capacity for CTL plate decreased by *** percent from 2013 to 2015, but *** during January to September 2016 as compared to January to September 2015. Production increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, but was *** percent higher during January to September 2016 than during January to September 2015.[28] Capacity utilization increased by *** percentage points from 2013 to 2014, decreased by *** percentage points from 2014 to 2015, but were *** percentage points higher during January to September 2016 than during January to September 2015. In addition, end-of-period inventories increased by *** percent from 2013 to 2015, and were *** percent higher during January to September 2016 than during January to September 2015.

Total shipments of the responding French producers increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, and were *** percent lower during January to September 2016 than during January to September 2015. Home market shipments declined from *** percent of total shipments in 2013 to *** percent of total shipments in 2015. Home market shipments by the responding French producers accounted for *** percent of total shipments during January to September 2016, up from *** percent of total shipments during January to September 2015.

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[27] Data on the tool steel industry as defined in the HTSUS in France are presented in app. H. Tool steel producers in France provided data on tool steel as defined in the HTSUS as well as data on tool steel combined with mold steel.

[28] ArcelorMittal (FR) is a ***. ***.

Exports of CTL plate to the United States increased by *** percent from 2013 to 2015, but were *** percent lower during January to September 2016 than during January to September 2015. French producers projected that exports to the United States will decrease during 2016-17. As a share of the responding French producers' total shipments, exports to the United States increased from *** percent in 2013 to *** percent in 2015, and were *** percent during January to September 2016, compared with *** percent during January to September 2015. Exports of CTL plate to countries other than the United States accounted for the *** of total shipments during 2013-15, increasing by *** percent from 2013 to 2014, decreasing by *** percent from 2014 to 2015, but were *** percent higher during January to September 2016 than during January to September 2015. Other export markets identified include ***.

Alternative products

*** produced both subject CTL plate and out-of-scope products on the same equipment as shown in table VII-20. Overall capacity utilization increased from *** percent in 2013 to *** percent in 2014, decreased to *** percent in 2015, but was *** percentage points higher during January to September 2016 than during January to September 2015. Production of subject CTL plate accounted for *** percent of total production on the same equipment as CTL plate and out-of-scope production accounted for *** percent in 2015. ***. Other products produced on the same equipment as CTL plate include ***.

Table VII-20
CTL plate: French producers' overall capacity and production on the same equipment as subject production, 2013-15, January to September 2015, and January to September 2016

* * * * * * *

Exports

According to GTA, the top export market for CTL plate from France was Germany in 2015 (table VII-21). The United States was the second-largest export destination of CTL plate from France. During 2015, Germany and the United States accounted for 34.1 and 27.5 percent of total exports from France of CTL plate, respectively.

Table VII-21
CTL plate: France's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Quantity (short tons)		
France's exports to the United States	98,325	149,568	200,372
France's exports to other major destination markets.--			
Germany	236,538	203,456	249,196
Netherlands	62,001	71,353	39,429
India	5,534	110,983	39,208
Belgium	31,616	29,454	22,697
United Arab Emirates	18,242	18,112	22,473
Spain	13,205	12,179	16,165
Austria	6,485	14,884	13,321
Korea	5,929	10,138	12,679
All other destination markets	176,283	134,428	114,199
Total exports from France	654,157	754,554	729,739
	Value (1,000 dollars)		
France's exports to the United States	98,716	145,104	152,914
France's exports to other major destination markets.--			
Germany	196,869	172,176	156,709
Netherlands	49,400	58,379	25,108
India	10,133	76,240	31,367
Belgium	25,526	23,718	16,009
United Arab Emirates	20,159	18,786	17,539
Spain	11,728	9,711	9,265
Austria	11,185	13,843	12,623
Korea	7,260	11,002	12,032
All other destination markets	216,486	170,737	122,329
Total exports from France	647,460	699,695	555,895

Table continued on next page.

Table VII-21—Continued
CTL plate: France's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Unit value (dollars per short ton)		
France's exports to the United States	1,004	970	763
France's exports to other major destination markets.--			
Germany	832	846	629
Netherlands	797	818	637
India	1,831	687	800
Belgium	807	805	705
United Arab Emirates	1,105	1,037	780
Spain	888	797	573
Austria	1,725	930	948
Korea	1,224	1,085	949
All other destination markets	1,228	1,270	1,071
Total exports from France	990	927	762
	Share of quantity (percent)		
France's exports to the United States	15.0	19.8	27.5
France's exports to other major destination markets.--			
Germany	36.2	27.0	34.1
Netherlands	9.5	9.5	5.4
India	0.8	14.7	5.4
Belgium	4.8	3.9	3.1
United Arab Emirates	2.8	2.4	3.1
Spain	2.0	1.6	2.2
Austria	1.0	2.0	1.8
Korea	0.9	1.3	1.7
All other destination markets	26.9	17.8	15.6
Total exports from France	100.0	100.0	100.0

Source: Official French export statistics under HTS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91 as reported by Eurostat in the GTIS/GTA database, accessed October 14, 2016.

THE INDUSTRY IN GERMANY

Overview

The Commission issued foreign producers' or exporters' questionnaires to 26 firms believed to produce and/or export CTL plate from Germany.[29] Useable responses to the Commission's questionnaire were received from six firms: Buderus, Dilinger Huettenwerke, Doerrenberg, Thyssenkrupp Europe, Thyssenkrupp Schulte, Friedr. Lohmann, Salzgitter, and Schmiedewerke. These firms' exports to the United States accounted for *** U.S. imports of

[29] These firms were identified through a review of information submitted in the petition and contained in proprietary Customs records.

CTL plate from Germany in 2015.[30] According to estimates requested of the responding German producers, the production of CTL plate in Germany reported in questionnaire responses accounted for *** production of CTL plate in Germany in 2015. Table VII-22 presents information on the CTL plate operations of the responding producers and exporters in Germany.

Table VII-22
CTL plate: Data for producers in Germany, 2015

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Changes in operations

As presented in table VII-23, responding German producers reported several operational changes since January 1, 2013.

Table VII-23
CTL plate: Reported changes in operations by firms in Germany since January 1, 2013

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Operations on CTL plate

Table VII-24 presents information on the CTL plate operations of the responding subject German producers and exporters 2013-15, January to September 2015, January to September 2016, as well as projections for 2016-17.[31] Projections of subject German producers indicate that production and shipments will increase, while capacity will fluctuate and inventories will decrease during 2016-17.

Table VII-24
CTL plate: Data on the industry in Germany, 2013-15, January to September 2015, January to September 2016, and projections, 2016-17

* * * * * * *

Capacity for CTL plate of subject German producers increased by *** percent from 2013 to 2014,[32] decreased by *** percent from 2014 to 2015, and was *** percent lower during January to September 2016 than during January to September 2015. Production of subject German producers increased by *** percent from 2013 to 2015, but was *** percent lower

[30] The coverage estimates presented are based on official import statistics.

[31] Data on the tool steel industry as defined in the HTSUS in Germany are presented in app. H. Tool steel producers in Germany provided data on tool steel as defined in the HTSUS as well as data on tool steel combined with mold steel.

[32] The increase in capacity in 2014 is largely due to ***. ***.

during January to September 2016 than during January to September 2015.[33] [34] Capacity utilization of subject German producers increased by *** percentage points from 2013 to 2015, but was *** percentage points lower during January to September 2016 than during January to September 2015.[35] In addition, end-of-period inventories of subject German producers increased by *** percent from 2013 to 2015, but was *** percent lower during January to September 2016 than during January to September 2015.

Total shipments of the responding subject German producers increased by *** percent from 2013 to 2015, but were *** percent lower during January to September 2016 than during January to September 2015. Home market shipments of subject German producers accounted for *** of total shipments, increasing from *** percent of total shipments in 2013 to *** percent of total shipments in 2014, but decreasing to *** percent of total shipments in 2015. Home market shipments by the responding subject German producers accounted for *** percent of total shipments during January to September 2016, up from *** percent of total shipments during January to September 2015.

Exports of CTL plate from subject German producers to the United States decreased by *** percent from 2013 to 2014, increased by *** percent from 2014 to 2015, but were *** percent lower during January to September 2016 than during January to September 2015. Exports to the United States increased overall by *** percent from 2013 to 2015. Subject German producers projected that exports to the United States will decrease during 2016 and 2017. As a share of the responding German producers' total shipments, exports to the United States decreased from *** percent in 2013 to *** percent in 2014, increased to *** percent in 2015, but were *** percent during January to September 2016 as compared to *** percent during January to September 2015. Exports of CTL plate from subject German producers to countries other than the United States decreased by *** percent from 2013 to 2014, increased by *** percent from 2014 to 2015, but were *** percent lower during January to September 2016 than during January to September 2015. Other export markets identified by responding subject and nonsubject German producers include ***.

[33] Friedr. Lohmann produces and exports only high-quality, high priced tool and stainless steels, and Schmiedewerke produces only forged high-alloy blocks and bars. French and German respondents' posthearing brief, p. 7.

[34] Dillinger affiliates and Salzgitter will also be CTL plate suppliers for the Nord Stream 2 pipeline project and started production in August 2016. In addition, Salzgitter will be supplying CTL plate to the "Turkish Stream" pipeline project that will transmit gas from Russia to southern Europe, and to the Zohr gas pipeline project in Egypt. French and German respondents' posthearing brief, p. 14.

[35] Buderus Edelstahl's ***. ***.

Alternative products

All responding German firms except for *** produced both subject CTL plate and out-of-scope products on the same equipment as shown in table VII-25. *** reported production of both subject CTL plate and out-of-scope products on the same equipment as shown in table VII-25. Overall capacity utilization increased from *** percent in 2013 to *** percent in 2015, but was *** percentage points lower during January to September 2016 than during January to September 2015. Production of subject CTL plate accounted for *** percent of total production on the same equipment and out-of-scope production accounted for *** percent in 2015. Seven responding German firms reported ***. Other products produced on the same equipment as CTL plate include ***.

Table VII-25
CTL plate: German producers' overall capacity and production on the same equipment as subject production, 2013-15, January to September 2015, and January to September 2016

* * * * * * *

Exports

According to GTA, the top export market for CTL plate from Germany was the Netherlands in 2015 (table VII-26). The United States was the second-largest export destination of CTL plate from Germany. During 2015, the Netherlands and the United States accounted for 15.0 and 13.5 percent of total exports from Germany of CTL plate, respectively.

Table VII-26
CTL plate: Germany's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Quantity (short tons)		
Germany's exports to the United States	120,859	107,070	259,107
Germany's exports to other major destination markets.--			
Netherlands	257,831	265,001	288,738
France	173,297	159,913	146,784
Austria	89,761	94,029	109,394
Russia	19,687	143,772	102,573
Italy	80,415	90,438	100,791
United Kingdom	56,628	65,199	98,131
Poland	79,676	76,618	83,582
Switzerland	71,187	71,042	78,279
All other destination markets	769,001	639,173	653,446
Total exports from Germany	1,718,344	1,712,256	1,920,825
	Value (1,000 dollars)		
Germany's exports to the United States	121,756	122,114	199,782
Germany's exports to other major destination markets.--			
Netherlands	242,343	248,963	192,753
France	164,843	143,684	104,247
Austria	92,885	90,696	84,906
Russia	21,177	114,672	73,144
Italy	94,384	100,729	91,164
United Kingdom	55,970	58,384	67,165
Poland	100,587	90,793	76,223
Switzerland	62,063	60,448	51,286
All other destination markets	914,061	767,271	572,676
Total exports from Germany	1,870,070	1,797,756	1,513,347

Table continued on next page.

Table VII-26—Continued
CTL plate: Germany's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Unit value (dollars per short ton)		
Germany's exports to the United States	1,007	1,141	771
Germany's exports to other major destination markets.--			
Netherlands	940	939	668
France	951	899	710
Austria	1,035	965	776
Russia	1,076	798	713
Italy	1,174	1,114	904
United Kingdom	988	895	684
Poland	1,262	1,185	912
Switzerland	872	851	655
All other destination markets	1,189	1,200	876
Total exports from Germany	1,088	1,050	788
	Share of quantity (percent)		
Germany's exports to the United States	7.0	6.3	13.5
Germany's exports to other major destination markets.--			
Netherlands	15.0	15.5	15.0
France	10.1	9.3	7.6
Austria	5.2	5.5	5.7
Russia	1.1	8.4	5.3
Italy	4.7	5.3	5.2
United Kingdom	3.3	3.8	5.1
Poland	4.6	4.5	4.4
Switzerland	4.1	4.1	4.1
All other destination markets	44.8	37.3	34.0
Total exports from Germany	100.0	100.0	100.0

Source: Official German export statistics under HTS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91 as reported by Eurostat in the GTIS/GTA database, accessed October 14, 2016.

THE INDUSTRY IN ITALY

Overview

The Commission issued foreign producers' or exporters' questionnaires to 14 firms believed to produce and/or export CTL plate from Italy.[36] Useable responses to the Commission's questionnaire were received from four firms: EVRAZ Palini, Ilva, NLMK Verona, and Officine. These firms' exports to the United States accounted for approximately ***

[36] These firms were identified through a review of information submitted in the petition and contained in proprietary Customs records.

percent of U.S. imports of CTL plate from Italy in 2015.[37] According to estimates requested of the responding Italian producers, the production of CTL plate in Italy reported in questionnaire responses accounted for approximately *** percent of overall production of CTL plate in Italy in 2015. Table VII-27 presents information on the CTL plate operations of the responding producers and exporters in Italy.

Table VII-27
CTL plate: Data for producers in Italy, 2015

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Changes in operations

As presented in table VII-28, responding Italian producers reported several operational changes since January 1, 2013.

Table VII-28
CTL plate: Reported changes in operations by firms in Italy since January 1, 2013

* * * * * * *

Operations on CTL plate

Table VII-29 presents information on the CTL plate operations of the responding Italian producers and exporters for 2013-15, January to September 2015, January to September 2016, as well as projections for 2016-17. Projections indicate that capacity, production, and shipments will increase, while inventories will fluctuate during 2016-17.

Italian capacity for CTL plate decreased by 15.6 percent from 2013 to 2015, but was 18.4 percent higher during January to September 2016 than during January to September 2015. Production increased by 9.3 percent from 2013 to 2014, decreased by 32.3 percent from 2014 to 2015, but was 11.5 percent higher during January to September 2016 than during January to September 2015. Capacity utilization increased by 12.8 percentage points from 2013 to 2014, decreased by 18.1 percentage points from 2014 to 2015, and was 2.2 percentage points lower during January to September 2016 than during January to September 2015. In addition, end-of-period inventories increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, but were *** percent higher during January to September 2016 than during January to September 2015.

Total shipments of the responding Italian producers increased by 1.0 percent from 2013 to 2014, decreased by 28.2 percent from 2014 to 2015, but were 2.5 percent higher during January to September 2016 than during January to September 2015. Home market shipments accounted for the *** of total shipments, declining from *** percent of total shipments in 2013

[37] The coverage estimates presented are based on official import statistics.

to *** percent of total shipments in 2015. Home market shipments by the responding Italian producers accounted for *** percent of total shipments during January to September 2016, up from *** percent of total shipments during January to September 2015.

Table VII-29
CTL plate: Data on the industry in Italy, 2013-15, January to September 2015, January to September 2016, and projections, 2016-17

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2013	2014	2015	2015	2016	2016	2017
	Quantity (short tons)						
Capacity	3,199,572	2,699,572	2,699,572	2,024,679	2,397,179	3,149,572	3,149,572
Production	1,386,039	1,515,409	1,026,652	767,334	855,652	1,377,853	1,686,371
End-of-period inventories	***	***	***	***	***	***	***
Shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial shipments	***	***	***	***	***	***	***
Subtotal, home market shipments	799,251	762,615	546,267	418,354	440,770	727,466	918,276
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	674,029	725,017	521,966	402,577	401,033	657,568	758,667
Total shipments	1,473,280	1,487,632	1,068,233	820,931	841,803	1,385,034	1,676,943
	Ratio and shares (percent)						
Capacity utilization	43.3	56.1	38.0	37.9	35.7	43.7	53.5
Inventories/production	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***
Share of total shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Home market commercial shipments	***	***	***	***	***	***	***
Subtotal, home market shipments	54.2	51.3	51.1	51.0	52.4	52.5	54.8
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	45.8	48.7	48.9	49.0	47.6	47.5	45.2
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Note.--Capacity and internal consumption decreased from 2013 to 2015 largely due to ***.
Note.--***. ***.

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

Exports of CTL plate to the United States increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, but were *** percent higher during January to September 2016 than during January to September 2015.[38] Exports of CTL plate to the United States decreased overall by *** percent from 2013 to 2015. Italian producers projected that exports to the United States will fluctuate during 2016-17. As a share of the responding Italian producers' total shipments, exports to the United States increased from *** percent in 2013 to *** percent in 2014, decreased to *** percent in 2015, but were *** percent during January to September 2016 as compared to *** percent during January to September 2015. Exports of CTL plate to countries other than the United States decreased by *** percent from 2013 to 2015, and were *** percent lower during January to September 2016 than during January to September 2015. Other export markets identified include ***.

Alternative products

*** produced both subject CTL plate and out-of-scope products on the same equipment as shown in table VII-30. Overall capacity utilization increased from 50.8 percent in 2013 to 62.1 percent in 2014, decreased to 42.4 percent in 2015, and was 1.7 percentage points lower during January to September 2016 than during January to September 2015. Production of subject CTL plate accounted for *** percent of total production on the same equipment and out-of-scope production accounted for *** percent of total production in 2015. ***. Other products produced on the same equipment as CTL plate include ***.

Table VII-30
CTL plate: Italian producers' overall capacity and production on the same equipment as subject production, 2013-15, January to September 2015, and January to September 2016

Item	Calendar year			January to September	
	2013	2014	2015	2015	2016
	Quantity (short tons)				
Overall production capacity	3,699,572	3,199,572	3,199,572	2,402,179	2,757,179
Production:					
In-scope CTL plate	1,386,039	1,515,409	1,026,652	767,334	855,652
Out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***
	Ratios and shares (percent)				
Overall capacity utilization	***	***	***	***	***
Share of production:					
In-scope CTL plate	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	100.0	100.0	100.0	100.0	100.0

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

[38] The increase in ***. ***.

Exports

According to GTA, the top export market for CTL plate from Italy was Germany in 2015 (table VII-31). Turkey was the second-largest export destination of CTL plate from Italy. During 2015, Germany and Turkey accounted for 22.1 and 10.7 percent of total exports from Italy of CTL plate, respectively.

Table VII-31
CTL plate: Italy's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Quantity (short tons)		
Italy's exports to the United States	49,142	112,369	45,398
Italy's exports to other major destination markets.-- Germany	440,010	400,686	322,366
Turkey	169,542	169,822	156,573
France	224,242	183,948	144,497
Austria	113,383	107,712	109,221
Hungary	62,336	77,076	82,278
Slovenia	53,615	57,172	79,942
Czech Republic	27,101	42,334	57,358
Spain	71,084	57,939	56,184
All other destination markets	349,016	383,541	404,789
Total exports from Italy	1,559,470	1,592,600	1,458,605
	Value (1,000 dollars)		
Italy's exports to the United States	32,536	75,166	27,525
Italy's exports to other major destination markets.-- Germany	289,840	256,983	162,097
Turkey	88,762	91,627	68,932
France	145,286	117,265	75,006
Austria	74,167	71,140	54,871
Hungary	39,668	49,462	40,247
Slovenia	36,229	37,870	40,487
Czech Republic	18,615	28,222	29,083
Spain	47,101	39,595	30,848
All other destination markets	255,646	263,614	221,554
Total exports from Italy	1,027,849	1,030,944	750,650

Table continued on next page.

Table VII-31—Continued
CTL plate: Italy's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Unit value (dollars per short ton)		
Italy's exports to the United States	662	669	606
Italy's exports to other major destination markets.--			
Germany	659	641	503
Turkey	524	540	440
France	648	637	519
Austria	654	660	502
Hungary	636	642	489
Slovenia	676	662	506
Czech Republic	687	667	507
Spain	663	683	549
All other destination markets	732	687	547
Total exports from Italy	659	647	515
	Share of quantity (percent)		
Italy's exports to the United States	3.2	7.1	3.1
Italy's exports to other major destination markets.--			
Germany	28.2	25.2	22.1
Turkey	10.9	10.7	10.7
France	14.4	11.6	9.9
Austria	7.3	6.8	7.5
Hungary	4.0	4.8	5.6
Slovenia	3.4	3.6	5.5
Czech Republic	1.7	2.7	3.9
Spain	4.6	3.6	3.9
All other destination markets	22.4	24.1	27.8
Total exports from Italy	100.0	100.0	100.0

Source: Official Italian export statistics under HTS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91 as reported by Eurostat in the GTIS/GTA database, accessed October 14, 2016.

THE INDUSTRY IN JAPAN

Overview

The Commission issued foreign producers' or exporters' questionnaires to 17 firms believed to produce and/or export CTL plate from Japan.[39] Useable responses to the Commission's questionnaire were received from six firms: Daido, Hitachi, JFE Corporation, Kobe Steel, NSSMC, and Tokyo Steel. These firms' exports to the United States accounted for approximately *** percent of U.S. imports of CTL plate from Japan in 2015.[40] According to

[39] These firms were identified through a review of information submitted in the petition and contained in proprietary Customs records.

[40] The coverage estimates presented are based on official import statistics.

estimates requested of the responding Japanese producers, the production of CTL plate in Japan reported in questionnaire responses accounted for *** production of CTL plate in Japan in 2015. Table VII-32 presents information on the CTL plate operations of the responding producers and exporters in Japan.

Table VII-32
CTL plate: Data for producers in Japan, 2015

* * * * * * *

Changes in operations

As presented in table VII-33, responding Japanese producers reported several operational changes since January 1, 2013.

Table VII-33
CTL plate: Reported changes in operations by firms in Japan since January 1, 2013

* * * * * * *

Operations on CTL plate

Table VII-34 presents information on the CTL plate operations of the responding Japanese producers and exporters for 2013-15, January to September 2015, January to September 2016, as well as projections for 2016-17.[41] Projections indicate that capacity will increase, while production, shipments, and inventories will fluctuate during 2016-17.

Japanese capacity for CTL plate decreased by 5.0 percent from 2013 to 2015, but was 1.3 percent higher during January to September 2016 than during January to September 2015. Production increased by 2.5 percent from 2013 to 2014, decreased by 9.7 percent from 2014 to 2015, but was 3.3 percent higher during January to September 2016 than during January to September 2015. Capacity utilization increased by 2.8 percentage points from 2013 to 2014, decreased by 5.1 percentage points from 2014 to 2015, but was 1.7 percentage points higher during January to September 2016 than during January to September 2015.[42] In addition, end-of-period inventories increased by 24.2 percent from 2013 to 2014, decreased by 3.2 percent from 2014 to 2015, but were 3.1 percent higher during January to September 2016 than during January to September 2015.

Total shipments of the responding Japanese producers increased by 1.6 percent from 2013 to 2014, decreased by 8.8 percent from 2014 to 2015, but were 3.0 percent higher during January to September 2016 than during January to September 2015. Home market shipments

[41] Data on the tool steel industry as defined in the HTSUS in Japan are presented in app. H. Tool steel producers in Japan provided data on tool steel as defined in the HTSUS as well as data on tool steel combined with mold steel.

[42] NSSMC explained that ***. ***.

accounted for the majority of total shipments, increasing from 71.6 percent of total shipments in 2013 to 75.6 percent of total shipments in 2014, decreasing to 73.5 percent of total shipments in 2015, and were 73.3 percent of total shipments during January to September 2016, down from 73.5 percent of total shipments during January to September 2015.

Table VII-34
CTL plate: Data on the industry in Japan, 2013-15, January to September 2015, January to September 2016, and projections, 2016-17

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2013	2014	2015	2015	2016	2016	2017
	Quantity (short tons)						
Capacity	14,677,807	14,603,734	13,950,219	10,550,473	10,690,776	14,328,961	14,339,760
Production	13,436,255	13,776,138	12,445,252	9,357,846	9,668,646	12,965,070	12,941,080
End-of-period inventories	440,772	547,461	530,082	507,793	523,626	467,246	467,570
Shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial shipments	***	***	***	***	***	***	***
Subtotal, home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	13,457,035	13,669,448	12,462,630	9,397,517	9,675,104	13,027,907	12,952,930
	Ratio and shares (percent)						
Capacity utilization	91.5	94.3	89.2	88.7	90.4	90.5	90.2
Inventories/production	3.3	4.0	4.3	4.1	4.1	3.6	3.6
Inventories/total shipments	3.3	4.0	4.3	4.1	4.1	3.6	3.6
Share of total shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Home market commercial shipments	***	***	***	***	***	***	***
Subtotal, home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Note.--NSSMC ***. ***.

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

Exports of CTL plate to the United States increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, and were *** percent lower during January to September 2016 than during January to September 2015.[43] Exports to the United States increased overall by *** percent from 2013 to 2015. The responding Japanese producers projected that its exports to the United States will further decrease during 2016-17. As a share of the responding Japanese producers' total shipments, exports to the United States increased from *** percent in 2013 to *** percent in 2014, decreased to *** percent of total shipments in 2015, and were *** percent during January to September 2016, compared with *** percent during January to September 2015. Exports of CTL plate to countries other than the United States decreased by *** percent from 2013 to 2015, but were *** percent higher during January to September 2016 than during January to September 2015. Other export markets identified include ***.

Alternative products

*** produced both subject CTL plate and out-of-scope products on the same equipment as shown in table VII-35. Overall capacity utilization increased from 91.5 percent in 2013 to 94.4 percent in 2014, decreased to 89.2 percent in 2015, but was 1.8 percent higher during January to September 2016 than during January to September 2015. Production of subject CTL plate accounted for *** percent of total production on the same equipment and out-of-scope production accounted for *** percent in 2015. ***. Other products produced on the same equipment as CTL plate include ***.

Table VII-35
CTL plate: Japanese producers' overall capacity and production on the same equipment as subject production, 2013-15, January to September 2015, and January to September 2016

Item	Calendar year			January to September	
	2013	2014	2015	2015	2016
	Quantity (short tons)				
Overall production capacity	14,734,169	14,661,996	14,010,680	10,595,969	10,736,472
Production:					
In-scope CTL plate	13,436,255	13,776,138	12,445,252	9,357,846	9,668,646
Out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***
	Ratios and shares (percent)				
Overall capacity utilization	***	***	***	***	***
Share of production:					
In-scope CTL plate	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	100.0	100.0	100.0	100.0	100.0

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

[43] Tokyo Steel ***. ***.

Exports

According to GTA, the top export market for CTL plate from Japan was China in 2015 (table VII-36). Korea was the second-largest export destination of CTL plate from Japan. During 2015, China and Korea accounted for 26.7 and 25.4 percent of total exports from Japan of CTL plate, respectively.

Table VII-36
CTL plate: Japan's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Quantity (short tons)		
Japan's exports to the United States	46,682	94,919	64,490
Japan's exports to other major destination markets.-- China	894,216	1,042,299	1,017,797
Korea	1,250,582	1,278,701	969,876
Philippines	319,882	349,328	381,007
Singapore	407,447	183,884	204,991
Vietnam	141,549	114,304	172,660
India	194,966	68,407	165,598
Mexico	99,582	64,265	136,437
Thailand	74,977	91,910	103,872
All other destination markets	713,739	461,059	598,939
Total exports from Japan	4,143,620	3,749,074	3,815,667
	Value (1,000 dollars)		
Japan's exports to the United States	48,123	71,543	46,296
Japan's exports to other major destination markets.-- China	657,656	788,118	575,101
Korea	866,729	896,476	560,559
Philippines	186,268	196,813	182,503
Singapore	243,169	134,357	104,137
Vietnam	66,642	56,634	62,752
India	131,345	65,608	113,732
Mexico	56,535	38,549	62,561
Thailand	55,959	67,087	68,706
All other destination markets	468,632	340,659	359,031
Total exports from Japan	2,781,057	2,655,845	2,135,378

Table continued on next page.

Table VII-36—Continued
CTL plate: Japan's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Unit value (dollars per short ton)		
Japan's exports to the United States	1,031	754	718
Japan's exports to other major destination markets.-- China	735	756	565
Korea	693	701	578
Philippines	582	563	479
Singapore	597	731	508
Vietnam	471	495	363
India	674	959	687
Mexico	568	600	459
Thailand	746	730	661
All other destination markets	657	739	599
Total exports from Japan	671	708	560
	Share of quantity (percent)		
Japan's exports to the United States	1.1	2.5	1.7
Japan's exports to other major destination markets.-- China	21.6	27.8	26.7
Korea	30.2	34.1	25.4
Philippines	7.7	9.3	10.0
Singapore	9.8	4.9	5.4
Vietnam	3.4	3.0	4.5
India	4.7	1.8	4.3
Mexico	2.4	1.7	3.6
Thailand	1.8	2.5	2.7
All other destination markets	17.2	12.3	15.7
Total exports from Japan	100.0	100.0	100.0

Source: Official Japan export statistics under HTS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91 as reported by Japan Ministry of Finance in the GTIS/GTA database, accessed October 14, 2016.

THE INDUSTRY IN KOREA

Overview

The Commission issued foreign producers' or exporters' questionnaires to 22 firms believed to produce and/or export CTL plate from Korea.[44] Useable responses to the Commission's questionnaire were received from POSCO. POSCO's exports to the United States accounted for *** subject U.S. imports of CTL plate from Korea in 2015.[45] According to

[44] These firms were identified through a review of information submitted in the petition and contained in proprietary Customs records.

[45] The coverage estimates presented are based on proprietary Customs data.

estimates requested of the responding Korean producer, the production of CTL plate in Korea reported in questionnaire responses accounted for approximately *** percent of overall production of CTL plate in Korea in 2015. Table VII-37 presents information on the CTL plate operations of the responding producer and exporter in Korea. POSCO also reported that its Pohang Steel Works CTL plate mill was installed.

Table VII-37
CTL plate: Data for the producer in Korea, 2015

* * * * * * *

Operations on CTL plate

Table VII-38 presents information on the CTL plate operations of the responding Korean producer and exporter for 2013-15, January to September 2015, January to September 2016, as well as projections for 2016-17. Projections indicate that capacity, shipments, and inventories will increase, while production will fluctuate during 2016-17.

Table VII-38
CTL plate: Data on Korean producer POSCO, 2013-15, January to September 2015, January to September 2016, and projections, 2016-17

* * * * * * *

POSCO's capacity for CTL plate increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, and was *** percent lower during January to September 2016 than during January to September 2015. Production increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, and was *** percent lower during January to September 2016 than during January to September 2015. Capacity utilization decreased by *** percentage points from 2013 to 2014, increased by *** percentage points from 2014 to 2015, and was *** percentage points higher during January to September 2016 than during January to September 2015. In addition, end-of-period inventories increased by *** percent from 2013 to 2015, but were *** percent lower during January to September 2016 than during January to September 2015.

Total shipments by Korean producer POSCO increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, but was *** percent lower during January to September 2016 than during January to September 2015. Home market shipments accounted for *** of POSCO's shipments, increasing from *** percent of total shipments in 2013 to *** percent of total shipments in 2014 but decreased to *** percent of total shipments in 2015. POSCO's home market shipments accounted for *** percent of total shipments during January to September 2016, down from *** percent of total shipments during January to September 2015.

Exports of CTL plate to the United States by Korean producer POSCO increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, but were *** percent higher during January to September 2016 than during January to September 2015.[46] Exports of CTL plate to the United States increased overall by *** percent from 2013 to 2015. As a share of POSCO's total shipments, exports to the United States increased from *** percent in 2013 to *** percent in 2014, decreased to *** percent in 2015, and were *** percent during January to September 2016 as compared to *** percent during January to September 2015. Exports of CTL plate to countries other than the United States decreased by *** percent from 2013 to 2014, increased by *** percent from 2014 to 2015, but were *** percent lower during January to September 2016 than during January to September 2015. Other export markets identified include ***.

Alternative products

POSCO produced *** as shown in table VII-39. Overall capacity utilization decreased from *** percent in 2013 to *** percent in 2014, increased to *** percent in 2015, and was *** percentage points higher during January to September 2016 than during January to September 2015. Production of subject CTL plate accounted for *** production on the CTL plate equipment. POSCO reported ***. Other products produced on the same equipment as CTL plate include ***.

Table VII-39
CTL plate: Korean producer POSCO's overall capacity and production on the same equipment as subject production, 2013-15, January to September 2015, and January to September 2016

* * * * * * *

Exports

According to GTA, the top export market for CTL plate from Korea was Japan in 2015 (table VII-40). China was the second-largest export destination of CTL plate from Korea. During 2015, Japan and China accounted for 16.7 and 15.5 percent of total exports from Korea of CTL plate, respectively.

[46] POSCO attributed the ***. Furthermore, shipbuilding is another sector in which POSCO increased its supply to the U.S. market. ***; POSCO's postconference brief, p. 14.

Table VII-40
CTL plate: Korea's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Quantity (short tons)		
Korea's exports to the United States	90,322	390,568	306,648
Korea's exports to other major destination markets.-- Japan	451,826	516,167	517,994
China	570,408	642,824	479,940
Vietnam	161,567	223,600	252,636
India	148,552	138,891	216,326
Philippines	234,924	236,110	205,742
Taiwan	76,630	113,829	185,674
Saudi Arabia	161,430	105,821	139,238
United Arab Emirates	253,875	130,605	137,619
All other destination markets	751,357	801,358	663,767
Total exports from Korea	2,900,891	3,299,774	3,105,585
	Value (1,000 dollars)		
Korea's exports to the United States	55,383	259,762	193,071
Korea's exports to other major destination markets.-- Japan	240,558	274,291	211,348
China	392,112	463,809	294,641
Vietnam	101,384	150,687	121,525
India	92,108	76,590	92,285
Philippines	140,738	137,919	94,060
Taiwan	42,071	60,387	75,983
Saudi Arabia	91,985	62,313	69,518
United Arab Emirates	144,787	83,234	60,536
All other destination markets	485,612	517,236	341,279
Total exports from Korea	1,786,737	2,086,230	1,554,246

Table continued on next page.

Table VII-40—Continued
CTL plate: Korea's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Unit value (dollars per short ton)		
Korea's exports to the United States	613	665	630
Korea's exports to other major destination markets.--			
Japan	532	531	408
China	687	722	614
Vietnam	628	674	481
India	620	551	427
Philippines	599	584	457
Taiwan	549	531	409
Saudi Arabia	570	589	499
United Arab Emirates	570	637	440
All other destination markets	646	645	514
Total exports from Korea	616	632	500
	Share of quantity (percent)		
Korea's exports to the United States	3.1	11.8	9.9
Korea's exports to other major destination markets.--			
Japan	15.6	15.6	16.7
China	19.7	19.5	15.5
Vietnam	5.6	6.8	8.1
India	5.1	4.2	7.0
Philippines	8.1	7.2	6.6
Taiwan	2.6	3.4	6.0
Saudi Arabia	5.6	3.2	4.5
United Arab Emirates	8.8	4.0	4.4
All other destination markets	25.9	24.3	21.4
Total exports from Korea	100.0	100.0	100.0

Note.--These data may include exports by firms other than ***.

Source: Official Korean export statistics under HTS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91 as reported by Korea Customs and Trade Development Institution in the GTIS/GTA database, accessed October 14, 2016.

THE INDUSTRY IN SOUTH AFRICA

Overview

The Commission issued foreign producers' or exporters' questionnaires to five firms believed to produce and/or export CTL plate from South Africa.[47] Useable responses to the Commission's questionnaire were received from two firms: ArcelorMittal South Africa and EVRAZ Highveld. These firms' exports to the United States accounted for *** percent of U.S.

[47] These firms were identified through a review of information submitted in the petition and contained in proprietary Customs records.

imports of CTL plate from South Africa in 2015.[48] According to estimates requested of the responding South African producers, the production of CTL plate in South Africa reported in questionnaire responses accounted for *** production of CTL plate in South Africa in 2015. ArcelorMittal South Africa noted that ***.[49] Table VII-41 presents information on the CTL plate operations of the responding producers and exporters in South Africa.

Table VII-41
CTL plate: Data for producers in South Africa, 2015

* * * * * * *

Changes in operations

As presented in table VII-42, responding South African producers reported several operational changes since January 1, 2013.

Table VII-42
CTL plate: Reported changes in operations by firms in South Africa since January 1, 2013

* * * * * * *

Operations on CTL plate

Table VII-43 presents information on the CTL plate operations of the responding South African producers and exporters for 2013-15, January to September 2015, January toSeptember 2016, as well as projections for 2016-17. Projections indicate that capacity and inventories will decrease, while production and shipments will fluctuate during 2016-17.

Table VII-43
CTL plate: Data on the industry in South Africa, 2013-15, January to September 2015, January to September 2016, and projections, 2016-17

* * * * * * *

South African capacity for CTL plate decreased by *** percent from 2013 to 2014, increased by *** percent from 2014 to 2015, but was *** percent lower during January to September 2016 than during January to September 2015 due to ***. Production decreased by *** percent from 2013 to 2015, but was *** percent higher during January to September 2016 than during January to September 2015. Capacity utilization increased by *** percentage points from 2013 to 2014, decreased by *** percentage points from 2014 to 2015, but was *** percentage points higher during January to September 2016 than during January to September

[48] The coverage estimates presented are based on official import statistics.
[49] ***.

2015. In addition, end-of-period inventories increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, and were *** percent lower during January to September 2016 than during January to September 2015.

Total shipments of the responding South African producers decreased by *** percent from 2013 to 2015, but were *** percent lower during January to September 2016 than during January to September 2015. Home market shipments accounted for the *** of total shipments, declining from *** percent of total shipments in 2013 to *** percent of total shipments in 2015. Home market shipments by the responding South African producers accounted for *** percent of total shipments during January to September 2016, up from *** percent of total shipments during January to September 2015.

Exports of CTL plate to the United States increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015 and was *** short tons during January to September 2016 as compared to *** short tons during January to September 2015.[50] Exports of CTL plate to the United States increased overall by *** percent from 2013 to 2015. South African producers projected that exports to the United States will continue to be *** in 2016 and 2017. Exports of CTL plate to countries other than the United States decreased by *** percent from 2013 to 2014, increased by *** percent from 2014 to 2015, and were *** percent lower during January to September 2016 than during January to September 2015. Exports to all other markets *** during 2013-15 as well as during January to September 2015 and January to September 2016. Other export markets identified include ***.

Alternative products

*** produced both subject CTL plate and out-of-scope products on the same equipment as shown in table VII-44. Overall capacity utilization increased from *** percent in 2013 to *** percent in 2014, decreased to *** percent in 2015 since ***, but was *** percentage points higher during January to September 2016 than during January to September 2015. Production of subject CTL plate accounted for *** percent of total production on the same equipment and out-of-scope production accounted for *** percent in 2015. ***. Other products produced on the same equipment as CTL plate include ***.

Table VII-44
CTL plate: South African producers' overall capacity and production on the same equipment as subject production, 2013-15, January to September 2015, and January to September 2016

* * * * * * *

[50] ArcelorMittal South Africa ***.

Exports

According to GTA, the top export market for CTL plate from South Africa was the United States in 2015 (table VII-45). Zambia was the second-largest export destination of CTL plate from South Africa. During 2015, the United States and Zambia accounted for 34.8 and 18.3 percent of total exports from South Africa of CTL plate, respectively.

Table VII-45
CTL plate: South Africa's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Quantity (short tons)		
South Africa's exports to the United States	15,889	29,761	20,168
South Africa's exports to other major destination markets.--			
Zambia	11,331	11,701	10,628
Canada	0	0	7,530
Zimbabwe	6,647	4,872	6,703
Mozambique	3,152	3,500	2,651
Congo Dem. Rep.	3,031	1,938	1,482
Namibia	146	776	1,355
Malawi	1,831	961	1,242
Tanzania	1,245	712	1,210
All other destination markets	1,405	24,713	4,966
Total exports from South Africa	44,676	78,934	57,935
	Value (1,000 dollars)		
South Africa's exports to the United States	8,871	16,753	9,459
South Africa's exports to other major destination markets.--			
Zambia	10,077	10,264	7,902
Canada	0	0	3,165
Zimbabwe	5,634	3,942	4,324
Mozambique	2,697	2,670	2,661
Congo Dem. Rep.	3,792	1,927	956
Namibia	111	613	1,134
Malawi	1,523	760	717
Tanzania	1,438	810	1,180
All other destination markets	1,053	20,901	6,163
Total exports from South Africa	35,195	58,641	37,661

Table continued on next page.

Table VII-45—Continued
CTL plate: South Africa's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Unit value (dollars per short ton)		
South Africa's exports to the United States	558	563	469
South Africa's exports to other major destination markets.--			
Zambia	889	877	743
Canada	0	0	420
Zimbabwe	848	809	645
Mozambique	856	763	1,004
Congo Dem. Rep.	1,251	994	645
Namibia	760	789	837
Malawi	832	791	577
Tanzania	1,156	1,137	975
All other destination markets	749	846	1,241
Total exports from South Africa	788	743	650
	Share of quantity (percent)		
South Africa's exports to the United States	35.6	37.7	34.8
South Africa's exports to other major destination markets.--			
Zambia	25.4	14.8	18.3
Canada	0.0	0.0	13.0
Zimbabwe	14.9	6.2	11.6
Mozambique	7.1	4.4	4.6
Congo Dem. Rep.	6.8	2.5	2.6
Namibia	0.3	1.0	2.3
Malawi	4.1	1.2	2.1
Tanzania	2.8	0.9	2.1
All other destination markets	3.1	31.3	8.6
Total exports from South Africa	100.0	100.0	100.0

Source: Official South African export statistics under HTS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91 as reported by South African Revenue Service in the GTIS/GTA database, accessed October 14, 2016.

THE INDUSTRY IN TAIWAN

Overview

The Commission issued foreign producers' or exporters' questionnaires to 18 firms believed to produce and/or export CTL plate from Taiwan.[51] Useable responses to the Commission's questionnaire were received from three firms: CSC, Shang Chen, and Tung Ho.

[51] These firms were identified through a review of information submitted in the petition and contained in proprietary Customs records.

These firms' exports to the United States accounted for *** of U.S. imports of CTL plate from Taiwan in 2015.[52] According to estimates requested of the responding producers in Taiwan, the production of CTL plate in Taiwan reported in questionnaire responses accounted for *** production of CTL plate in Taiwan in 2015. Table VII-46 presents information on the CTL plate operations of the responding producers and exporters in Taiwan. No responding firm reported changes in operations since January 1, 2013.

Table VII-46
CTL plate: Data for producers in Taiwan, 2015

* * * * * * *

Operations on CTL plate

Table VII-47 presents information on the CTL plate operations of the responding producers and exporters in Taiwan for 2013-15, January to September 2015, January to September 2016, as well as projections for 2016-17. Projections indicate that capacity will decrease slightly, production will increase, while shipments and inventories will fluctuate during 2016-17.

Table VII-47
CTL plate: Data on the industry in Taiwan, 2013-15, January to September 2015, January to September 2016, and projections, 2016-17

* * * * * * *

Capacity for CTL plate in Taiwan increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, and was *** percent lower during January to September 2016 than during January to September 2015.[53] Production increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, and was *** percent lower during January to September 2016 than during January to September 2015.[54] Capacity utilization increased by *** percentage points from 2013 to 2014, decreased by *** percentage points from 2014 to 2015, and was *** percentage points lower during January to September 2016 than during January to September 2015. In addition, end-of-period inventories increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, but were *** percent higher during January to September 2016 than during January to September 2015.

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[52] The coverage estimates presented are based on official import statistics.

[53] Tung Ho noted that ***. ***.

[54] Shang Chen does not offer CTL plate in lengths greater than 9 meters or in widths greater than 1.55 meteres. Therefore, Shang Chen cannot compete for sales to producers of larger-diameter pipe or to other customers requiring longer or wider CTL plate products. In addition, Shang Chen's production is focused on small-gauged CTL plate, which is used in repair and maintenance, construction edges, or parts of small machines. CSC's prehearing brief, pp. 6, 9.

Total shipments of the responding producers in Taiwan increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, and were *** percent lower during January to September 2016 than during January to September 2015. Home market shipments accounted for *** of total shipments, decreasing from *** percent of total shipments in 2013 to *** percent of total shipments in 2014 but increased to *** percent of total shipments in 2015. Home market shipments by the responding producers in Taiwan accounted for *** percent during January to September 2016, down from *** percent during January to September 2015.

Exports of CTL plate from Taiwan to the United States increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, and were *** percent lower during January to September 2016 than during January to September 2015.[55] Exports to the United States decreased overall by *** percent from 2013 to 2015. Producers in Taiwan project that exports to the United States will decrease in 2016 but increase in 2017. As a share of the responding producers' total shipments, exports to the United States increased from *** percent in 2013 to *** percent in 2014, decreased to *** percent in 2015, and were *** percent during January to September 2016 as compared to *** percent during January to September 2015. Exports of CTL plate to countries other than the United States increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, but were *** percent higher during January to September 2016 than during January to September 2015. Other export markets identified include ***.

Alternative products

All of the responding producers in Taiwan produced both subject CTL plate and out-of-scope products on the same equipment as shown in table VII-48. Overall capacity utilization increased from *** percent from 2013 to *** percent in 2014, and was *** percentage points lower during January to September 2016 than during January to September 2015. Production of subject CTL plate accounted for *** percent of total production on the same equipment and out-of-scope production accounted for *** percent in 2015. The producers in Taiwan reported ***. Other products produced on the same equipment as CTL plate include ***.

Table VII-48
CTL plate: Producers' overall capacity and production in Taiwan on the same equipment as subject production, 2013-15, January to September 2015, and January to September 2016

* * * * * * *

[55] Shang Chen noted that its ***. ***.

Exports

According to GTA, the top export market for CTL plate from Taiwan was Japan in 2015 (table VII-49). The United States was the second-largest export destination of CTL plate from Taiwan. During 2015, Japan and the United States accounted for 33.6 and 20.1 percent of total exports from Taiwan of CTL plate, respectively.

Table VII-49
CTL plate: Taiwan's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Quantity (short tons)		
Taiwan's exports to the United States	41,992	64,256	26,923
Taiwan's exports to other major destination markets.--Japan	35,909	49,492	45,045
Australia	27,335	22,499	10,681
Canada	3,111	4,126	9,254
Vietnam	18,198	20,883	8,213
Malaysia	16,395	4,336	7,032
China	3,372	5,504	5,731
Thailand	114,335	7,428	4,853
Indonesia	16,991	8,240	3,982
All other destination markets	32,624	10,259	12,168
Total exports from Taiwan	310,262	197,024	133,882
	Value (1,000 dollars)		
Taiwan's exports to the United States	24,633	40,186	14,908
Taiwan's exports to other major destination markets.--Japan	18,662	26,856	18,634
Australia	16,400	13,450	5,254
Canada	1,858	2,533	4,636
Vietnam	11,263	14,381	4,480
Malaysia	10,337	2,880	3,796
China	6,185	7,011	5,509
Thailand	6,312	5,068	2,997
Indonesia	9,905	5,354	2,233
All other destination markets	19,708	7,004	6,224
Total exports from Taiwan	125,262	124,722	68,672

Table continued on next page.

Table VII-49—Continued
CTL plate: Taiwan's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Unit value (dollars per short ton)		
Taiwan's exports to the United States	587	625	554
Taiwan's exports to other major destination markets.--			
Japan	520	543	414
Australia	600	598	492
Canada	597	614	501
Vietnam	619	689	545
Malaysia	631	664	540
China	1,834	1,274	961
Thailand	55	682	617
Indonesia	583	650	561
All other destination markets	604	683	511
Total exports from Taiwan	404	633	513
	Share of quantity (percent)		
Taiwan's exports to the United States	13.5	32.6	20.1
Taiwan's exports to other major destination markets.--			
Japan	11.6	25.1	33.6
Australia	8.8	11.4	8.0
Canada	1.0	2.1	6.9
Vietnam	5.9	10.6	6.1
Malaysia	5.3	2.2	5.3
China	1.1	2.8	4.3
Thailand	36.9	3.8	3.6
Indonesia	5.5	4.2	3.0
All other destination markets	10.5	5.2	9.1
Total exports from Taiwan	100.0	100.0	100.0

Source: Official Taiwanese export statistics under HTS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91 as reported by Taiwan Directorate General of Customs in the GTIS/GTA database, accessed October 14, 2016.

THE INDUSTRY IN TURKEY

Overview

The Commission issued foreign producers' or exporters' questionnaires to 12 firms believed to produce and/or export CTL plate from Turkey.[56] Useable responses to the Commission's questionnaire were received from one firm: Erdemir. This firm's exports to the United States accounted for *** U.S. imports of CTL plate from Turkey in 2015.[57] According to estimates requested of the responding Turkish producer, the production of CTL plate in Turkey

[56] These firms were identified through a review of information submitted in the petition and contained in proprietary Customs records.

[57] The coverage estimates presented are based on official import statistics.

reported in questionnaire responses accounted for approximately *** percent of overall production of CTL plate in Turkey in 2015. Table VII-50 presents information on the CTL plate operations of the responding producer and exporter in Turkey. Erdemir did not report any changes in operations since January 1, 2013.

Table VII-50
CTL plate: Data for the producer in Turkey, 2015

* * * * * * *

Operations on CTL plate

Table VII-51 presents information on the CTL plate operations of the responding Turkish producer/exporter for 2013-15, January to September 2015, January to September 2016, as well as projections for 2016-17. Projections indicate that capacity, production, shipments, and inventories will decrease overall during 2016-17.

Table VII-51
CTL plate: Data on Turkish producer Erdemir, 2013-15, January to September 2015, January to September 2016, and projections, 2016-17

* * * * * * *

Turkish producer Erdemir's capacity for CTL plate increased by *** percent from 2013 to 2015,[58] but was *** percent lower during January to September 2016 than during January to September 2015. Production increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, but was *** percent higher during January to September 2016 than during January to September 2015. Capacity utilization increased by *** percentage points from 2013 to 2014, decreased by *** percentage points from 2014 to 2015, but was *** percentage point higher during January to September 2016 than during January to September 2015. In addition, end-of-period inventories decreased by *** percent from 2013 to 2015, and were *** percent lower during January to September 2016 than during January to September 2015.

Total shipments of the responding Turkish producer increased by *** percent from 2013 to 2015, but were *** percent lower during January to September 2016 than during January to September 2015. Home market shipments accounted for *** of total shipments, declining from *** percent of total shipments in 2013 to *** percent of total shipments in 2014 but increasing to *** percent of total shipments in 2015. Home market shipments were *** percent of total

[58] Erdemir noted that ***. ***.

shipments during January to September 2016, down from *** percent of total shipments during January to September 2016.[59]

Exports of CTL plate to the United States by Turkish producer Erdemir increased by *** percent from 2013 to 2014 due to ***, decreased by *** percent from 2014 to 2015, but were *** percent higher during January to September 2016 than during January to September 2015.[60] [61] Exports to the United States decreased overall by *** percent from 2013 to 2015.[62] Erdemir projected that exports to the United States ***. As a share of the responding Turkish producer's total shipments, exports to the United States increased from *** percent in 2013 to *** percent in 2014, decreased to *** percent in 2015, but were *** percent of total shipments during January to September 2016 as compared to *** percent of total shipments during January to September 2015. Exports of CTL plate to countries other than the United States increased by *** percent from 2013 to 2014, decreased by *** percent from 2014 to 2015, and were *** percent lower during January to September 2016 than during January to September 2015. Other export markets identified include ***.

Alternative products

Erdemir produced *** as shown in table VII-52. Overall capacity utilization increased from *** percent in 2013 to *** percent in 2015, but was *** percentage points lower during January to September 2016 than during January to September 2015. Production of subject CTL plate accounted for *** percent of total production on the same equipment and out-of-scope production accounted for *** percent in 2015. Other products produced on the same equipment as CTL plate include ***. Additionally, Erdemir reported that ***.

Table VII-52
CTL plate: Turkish producer Erdemir's overall capacity and production on the same equipment as subject production, 2013-15, January to September 2015, and January to September 2016

* * * * * * *

[59] Erdemir explained that the Turkish domestic market is experiencing strong local demand, which is supported by construction projects and renewable energy investments in the wind tower industry. Erdemir's prehearing brief, p. 6, hearing transcript, p. 189 (Kazimli).

[60] ***.

[61] ***. ***.

[62] Erdmir noted that its CTL plate mill is not suitable to produce certain high grades of CTL plate since it does not have a water cooling unit installed. It is also unable to supply CTL plate outside a thickness range of *** millimeters for export due to technical constraints regarding the firm's rolling practices. Erdemir's prehearing brief, p. 6; Erdemir's posthearing brief, p. 1.

Exports

According to GTA, the top export market for CTL plate from Turkey was Iraq in 2015 (table VII-53). Nigeria was the second-largest export destination of CTL plate from Turkey. During 2015, Iraq and Nigeria accounted for 14.8 and 11.4 percent of total exports from Turkey of CTL plate, respectively.

Table VII-53
CTL plate: Turkey's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Quantity (short tons)		
Turkey's exports to the United States	32,089	115,118	17,724
Turkey's exports to other major destination markets.--			
Iraq	18,801	23,869	41,751
Nigeria	31,801	29,618	32,173
Egypt	4,072	5,894	23,252
Syria	219	6,568	14,942
United Kingdom	1,555	8,653	14,911
Ethiopia	6,363	15,900	10,547
France	5,889	5,025	9,622
Georgia	5,310	5,889	7,294
All other destination markets	100,921	131,190	109,549
Total exports from Turkey	207,019	347,724	281,765
	Value (1,000 dollars)		
Turkey's exports to the United States	18,028	67,681	6,463
Turkey's exports to other major destination markets.--			
Iraq	14,620	17,438	22,495
Nigeria	23,803	19,816	15,886
Egypt	2,484	3,444	8,796
Syria	136	3,467	8,148
United Kingdom	932	4,628	5,742
Ethiopia	3,857	9,349	5,176
France	3,274	2,798	3,817
Georgia	4,768	3,548	3,336
All other destination markets	68,283	79,488	55,383
Total exports from Turkey	140,184	211,658	135,244

Table continued on next page.

Table VII-53—Continued
CTL plate: Turkey's exports to its top destination markets and the United States, 2013-15

Destination	Calendar year		
	2013	2014	2015
	Unit value (dollars per short ton)		
Turkey's exports to the United States	562	588	365
Turkey's exports to other major destination markets.--			
Iraq	778	731	539
Nigeria	749	669	494
Egypt	610	584	378
Syria	619	528	545
United Kingdom	599	535	385
Ethiopia	606	588	491
France	556	557	397
Georgia	898	603	457
All other destination markets	677	606	506
Total exports from Turkey	677	609	480
	Share of quantity (percent)		
Turkey's exports to the United States	15.5	33.1	6.3
Turkey's exports to other major destination markets.--			
Iraq	9.1	6.9	14.8
Nigeria	15.4	8.5	11.4
Egypt	2.0	1.7	8.3
Syria	0.1	1.9	5.3
United Kingdom	0.8	2.5	5.3
Ethiopia	3.1	4.6	3.7
France	2.8	1.4	3.4
Georgia	2.6	1.7	2.6
All other destination markets	48.7	37.7	38.9
Total exports from Turkey	100.0	100.0	100.0

Source: Official Turkish export statistics under HTS subheadings 7208.40, 7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91 as reported by State Insitute of Statistics in the GTIS/GTA database, accessed October 14, 2016.

THE INDUSTRY IN THE SUBJECT COUNTRIES

Table VII-54 presents information on the CTL plate operations of the producers and exporters in all 12 subject countries combined during 2013-15, January to September 2015, January to September 2016, as well as projections for 2016-17.

Table VII-54
CTL plate: Data on the industry in subject countries, 2013-15, January to September 2015, January to September 2016, and projections, 2016-17

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2013	2014	2015	2015	2016	2016	2017
	Quantity (short tons)						
Capacity	39,497,101	39,435,011	38,557,030	29,041,583	28,647,272	38,610,995	39,397,888
Production	31,276,768	32,614,923	29,925,358	22,712,900	22,687,393	30,990,542	32,202,978
End-of-period inventories	1,990,815	2,149,798	1,943,029	2,004,780	1,878,166	1,706,700	1,664,371
Shipments:							
Home market shipments:							
Internal consumption/transfers	3,273,796	3,311,717	2,529,045	1,962,882	2,471,506	3,254,318	3,672,592
Commercial shipments	18,310,073	19,013,580	17,867,075	13,536,901	12,980,694	18,205,392	18,704,887
Subtotal, home market shipments	21,583,869	22,325,297	20,396,120	15,499,783	15,452,200	21,459,710	22,377,479
Export shipments to:							
United States	585,581	1,251,867	982,725	740,617	626,908	627,217	573,441
All other markets	9,294,642	8,887,166	8,763,531	6,625,077	6,681,591	9,046,386	9,315,856
Total exports	9,880,223	10,139,033	9,746,256	7,365,694	7,308,499	9,673,603	9,889,297
Total shipments	31,464,092	32,464,330	30,142,376	22,865,477	22,760,699	31,133,313	32,266,776
	Ratio and shares (percent)						
Capacity utilization	79.2	82.7	77.6	78.2	79.2	80.3	81.7
Inventories/production	6.4	6.6	6.5	6.6	6.2	5.5	5.2
Inventories/total shipments	6.3	6.6	6.4	6.6	6.2	5.5	5.2
Share of total shipments:							
Home market shipments:							
Internal consumption/transfers	10.4	10.2	8.4	8.6	10.9	10.5	11.4
Home market commercial shipments	58.2	58.6	59.3	59.2	57.0	58.5	58.0
Subtotal, home market shipments	68.6	68.8	67.7	67.8	67.9	68.9	69.4
Export shipments to:							
United States	1.9	3.9	3.3	3.2	2.8	2.0	1.8
All other markets	29.5	27.4	29.1	29.0	29.4	29.1	28.9
Total exports	31.4	31.2	32.3	32.2	32.1	31.1	30.6
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Note.--Seven foreign producers *** projected *** of CTL plate exports to the United States in 2017 during the preliminary phase, although they projected zero short tons would be exported to the United States during these final phase.

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

U.S. INVENTORIES OF IMPORTED MERCHANDISE

Table VII-55 presents data on U.S. importers' reported inventories of CTL plate.

Table VII-55
CTL plate: U.S. importers' end-of-period inventories, 2013-15, January to September 2015, and January to September 2016

* * * * * * *

U.S. IMPORTERS' OUTSTANDING ORDERS

The Commission requested importers to indicate whether they imported or arranged for the importation of CTL plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan and/or Turkey after September 30, 2016 (table VII-56).

Table VII-56
CTL plate: U.S. importers' arranged imports, October 2016 through September 2017

* * * * * * *

ANTIDUMPING OR COUNTERVAILING DUTY ORDERS IN THIRD-COUNTRY MARKETS

The Commission asked questionnaire recipients to identify whether the products subject to this proceeding have been the subject of any other import relief proceedings in the United States or in any other countries. Staff also requested in the preliminary phase of these investigations that parties identify any such proceedings in their postconference briefs. Information obtained from such requests is presented in table VII-57.

Table VII-57
CTL plate: Import relief proceedings in third-country markets

Export market	Subject country	Date/measure
	China (AD and CVD), Japan, Korea	December 19, 2013: AD and CVD orders on hot-rolled steel plate
Australia	Japan	November 15, 2014: AD order on quenched and tempered alloy steel plate
Brazil	China, Korea, South Africa	October 2, 2013: AD orders on low-carbon heavy plates
	China	October 27, 1997: AD order on hot-rolled carbon steel plate and high-strength low-alloy steel plate in cut lengths
Canada	Brazil, Italy, Japan, Korea	May 20, 2014: AD orders on hot-rolled carbon steel plate and high-strength low-alloy steel plate in cut lengths
European Union	China	Initiated on February 13, 2016: AD investigation on flat products of non-alloy or alloy steel; hot; rolled; not in coils
	Austria, Belgium, Brazil, China, France, Germany, Italy, South Africa, Taiwan, and Turkey	December 7, 2015: Safeguard investigation initiated on alloy or non-alloy hot-rolled flat sheets and plates
	Austria, Belgium, Brazil, China, France, Germany, Italy ,South Africa, Taiwan, and Turkey	Effective August 12, 2015: Increased import duties on hot-rolled steel plate to 10 percent
	Brazil, China, Japan, and Korea	April 11, 2016: Initiated AD investigation on hot-rolled flat products of alloy or non-alloy steel
India	Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey	February 5, 2016: Minimum import price set on hot-rolled flat-rolled products of iron, non-allot, or other alloy steel
Indonesia	China	January 10, 2012: AD order on hot-rolled plate
Malaysia	Austria, Belgium, China, France, Germany, Italy, Japan, and Korea	July 2, 2015: Safeguard measures on hot-rolled steel plate of iron or non-alloy steel and other alloy steel
Mexico	China	October 15, 2014: AD order on hot-rolled carbon steel plate
Morocco	Austria, Belgium, France, Germany, and Italy	September 26, 2014: AD order on hot-rolled steel plate
Pakistan	Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey	Increased import duties of 12.5 percent.

Table continued on next page.

Table VII-57—Continued
CTL plate: Import relief proceedings in third-country markets

Export market	Subject country	Date/measure
South Africa	Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, Taiwan, and Turkey	March 24, 2016: Initiated safeguard investigation on hot-rolled, flat-rolled products of iron, non-alloy or other alloy steel
Taiwan	Brazil, China, India, Indonesia, Korea, and Ukraine	February 22, 2016: Initiated AD investigations on carbon steel plate
	Japan, Korea, South Africa, and Taiwan	May 27, 2003: AD order on flat hot-rolled steel
	Austria, Belgium, China, France Germany, Italy, Japan, Korea, and Turkey	February 27, 2013: Safeguard measures put into place, which were extended on February 27, 2016 for three years
	Austria, Belgium, Brazil, France, Germany, Italy, Japan, Korea, Taiwan, and Turkey	June 7, 2014: Safeguard measures on non-alloy hot-rolled flat products
	China	August 12, 2011: AD order on flat hot-rolled steel
Thailand	China	December 26, 2012: AD order on flat hot-rolled steel added boron

Source: Compiled from data submitted in response to Commission questionnaires; Nucor's prehearing brief, exh. 18.

INFORMATION ON NONSUBJECT COUNTRIES

Global exports

The largest CTL plate global exporters are China, Japan, and Korea, which accounted for about 25 percent, 12 percent, and 9 percent of global exports, respectively (table VII-58).

Table VII-58
CTL plate: Global exports, by source, 2013-15

Item	Calendar year			Calendar year		
	2013	2014	2015	2013	2014	2015
	Quantity (short tons)			Value (1,000 dollars)		
United States	1,189,104	1,328,883	1,113,124	1,057,305	1,224,730	957,754
Austria	873,312	1,014,102	978,787	778,703	845,061	670,145
Belgium	1,250,852	1,327,569	1,506,719	1,149,268	1,160,457	1,010,642
Brazil	172,622	304,860	138,472	127,124	221,494	71,133
China	4,498,512	7,648,148	8,219,405	2,465,493	3,850,315	3,098,357
France	654,157	754,554	729,739	647,460	699,695	555,895
Germany	1,718,344	1,712,256	1,920,825	1,870,070	1,797,756	1,513,347
Italy	1,559,470	1,592,600	1,458,605	1,027,849	1,030,944	750,650
Japan	4,143,620	3,749,074	3,815,667	2,781,057	2,655,845	2,135,378
Korea	2,900,891	3,299,774	3,105,585	1,786,737	2,086,230	1,554,246
South Africa	44,676	78,934	57,935	35,195	58,641	37,661
Taiwan	310,262	197,024	133,882	125,262	124,722	68,672
Turkey	207,019	347,724	281,765	140,184	211,658	135,244
All other sources	11,471,755	11,497,988	9,656,025	7,706,527	7,719,737	5,402,614
Total global exports	30,994,593	34,853,490	33,116,536	21,698,234	23,687,283	17,961,739
	Share of quantity (percent)			Share of value (percent)		
United States	3.8	3.8	3.4	4.9	5.2	5.3
Austria	2.8	2.9	3.0	3.6	3.6	3.7
Belgium	4.0	3.8	4.5	5.3	4.9	5.6
Brazil	0.6	0.9	0.4	0.6	0.9	0.4
China	14.5	21.9	24.8	11.4	16.3	17.2
France	2.1	2.2	2.2	3.0	3.0	3.1
Germany	5.5	4.9	5.8	8.6	7.6	8.4
Italy	5.0	4.6	4.4	4.7	4.4	4.2
Japan	13.4	10.8	11.5	12.8	11.2	11.9
Korea	9.4	9.5	9.4	8.2	8.8	8.7
South Africa	0.1	0.2	0.2	0.2	0.2	0.2
Taiwan	1.0	0.6	0.4	0.6	0.5	0.4
Turkey	0.7	1.0	0.9	0.6	0.9	0.8
All other sources	37.0	33.0	29.2	35.5	32.6	30.1
Total global exports	100.0	100.0	100.0	100.0	100.0	100.0

Source: Official exports statistics under HTS subheadings 7208.40,7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91 as reported by various national statistical authorities in the IHS, Inc./GTA database, accessed October 14, 2016.

The industry in Canada

Canada was the largest nonsubject source of CTL plate imports into the United States 2013-15. According to ***, Essar Steel Algoma is the only producer of CTL plate in Canada, which had a reversing mill plate capacity of *** short tons in 2015.[63] In 2015, CTL plate from Canada accounted for approximately *** percent of CTL plate imports into the United States from nonsubject countries, and 11.3 percent of all U.S. CTL plate imports (table IV-2). In the first three quarters of 2016 (January-September), CTL plate from Canada accounted for 12.9 percent of CTL plate imported into the United States and *** percent of CTL plate imports from nonsubject countries.

The United States is by far Canada's largest export market for CTL plate (table VII-59). The only other export market that accounted for as much as 1 percent of Canada's exports over 2013-15 was Mexico with a 4.4 percent share in 2015. The average unit value of Canada's CTL plate exports to the United States was $839 per short ton in 2013, $843 in 2014, and $688 in 2015.

[63] ***. This capacity does not include potential strip mill, Steckel mill, or bar mill production.

Table VII-59
CTL plate: Canada exports by destination market, 2013-15

Item	Calendar year			Calendar year		
	2013	2014	2015	2013	2014	2015
	Quantity (short tons)			Value (1,000 dollars)		
Canada's exports to the United States	223,349	310,586	280,855	187,462	261,898	193,230
Canada's exports to other major destination markets.--						
Mexico	3,727	17,981	13,114	3,416	16,800	10,548
Cuba	330	486	227	317	516	165
Korea	4	20	185	9	19	229
Germany	11	0	161	8	0	111
China	4	44	51	4	29	44
United Arab Emirates	0	6	44	0	8	27
Egypt	0	0	30	0	0	42
India	30	1	20	46	0	11
All other destination markets	1,742	1,336	54	1,805	1,148	50
Total Canada exports	229,197	330,459	294,741	193,067	280,416	204,457
	Share of quantity (percent)			Unit value (dollars per short ton)		
Canada's exports to the United States	97.4	94.0	95.3	839	843	688
Canada's exports to other major destination markets.--						
Mexico	1.6	5.4	4.4	917	934	804
Cuba	0.1	0.1	0.1	961	1,061	728
Korea South	0.0	0.0	0.1	2,002	946	1,236
Germany	0.0	0.0	0.1	747	0	690
China	0.0	0.0	0.0	995	661	871
United Arab Emirates	0.0	0.0	0.0	0	1,382	602
Egypt	0.0	0.0	0.0	0	0	1,414
India	0.0	0.0	0.0	1,547	320	561
All other destination markets	0.8	0.4	0.0	1,036	859	919
Total Canada exports	100.0	100.0	100.0	842	849	694

Source: Official Canadian exports statistics under subheadings 7208.40,7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91 as reported by various national statistical authorities in the GTIS/GTA database as reported by Statistics Canada in the IHS, Inc./GTA database, accessed October 14, 2016.

The industry in Mexico

Mexico is also a substantial source of CTL plate imports into the United States. According to ***, Ahmsa is the only producer of CTL plate in Mexico, which had a reversing mill plate capacity of *** short tons in 2015.[64] In 2015, imports from Mexico accounted for approximately *** percent of CTL plate imports from nonsubject countries into the United States and 3.3 percent of all U.S. CTL plate imports (table IV-2). In the first three quarters of 2016, the share of imports from Mexico increased to 4.2 percent of all CTL plate imports into the United States and *** percent of imports from nonsubject countries. Information on Mexico's exports by destination is presented in table VII-60.

[64] ***. This capacity does not include potential strip mill, Steckel mill, or bar mill production.

Table VII-60
CTL plate: Mexico exports by destination market, 2013-15

Item	Calendar year			Calendar year		
	2013	2014	2015	2013	2014	2015
	Quantity (short tons)			Value (1,000 dollars)		
Mexico's exports to the United States	89,931	100,646	63,217	57,046	69,851	36,519
Mexico's exports to other major destination markets.--						
Guatemala	1,641	1,185	5,868	1,390	1,244	4,945
Cuba	474	61	2,695	749	83	1,747
Australia	265	348	1,206	308	376	1,088
Honduras	293	1,496	1,011	267	1,422	698
Belize	299	495	399	246	440	307
Nicaragua	651	676	341	550	641	299
Colombia	450	46	180	331	36	147
El Salvador	1,319	585	130	1,127	517	100
All other destination markets	4,351	328	230	3,065	2,218	335
Total Mexico exports	99,674	105,867	75,277	65,079	76,829	46,186
	Share of quantity (percent)			Unit value (dollars per short ton)		
Mexico's exports to the United States	90.2	95.1	84.0	634	694	578
Mexico's exports to other major destination markets.--						
Guatemala	1.6	1.1	7.8	847	1,050	843
Cuba	0.5	0.1	3.6	1,581	1,374	648
Australia	0.3	0.3	1.6	1,164	1,081	902
Honduras	0.3	1.4	1.3	910	951	690
Belize	0.3	0.5	0.5	822	889	770
Nicaragua	0.7	0.6	0.5	844	949	878
Colombia	0.5	0.0	0.2	736	767	820
El Salvador	1.3	0.6	0.2	854	883	771
All other destination markets	4.4	0.3	0.3	704	6,753	1,455
Total Mexico exports	100.0	100.0	100.0	653	726	614

Source: Official Mexican exports statistics under subheadings 7208.40,7208.51, 7208.52, 7211.13, 7211.14, 7225.40, 7226.20, and 7226.91 as reported by various national statistical authorities in the GTIS/GTA database as reported by Mexico's INEGI in the IHS, Inc./GTA database, accessed October 14, 2016.

Global production

Data on global production of reversing mill plate is presented in table VII-61.

Table VII-61
Plate: Global production of reversing mill plate, by selected countries and region, actual production for 2013-15, and projected production for 2016-17

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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
81 FR 22116 April 14, 2016	*Certain Carbon and Alloy Steel Cut-to-Length Plate From Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey; Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations*	https://www.gpo.gov/fdsys/pkg/FR-2016-04-14/pdf/2016-08543.pdf
81 FR 27089 May 5, 2016	*Certain Carbon and Alloy Steel Cut-To-Length Plate From Austria, Belgium, Brazil, France, the Federal Republic of Germany, Italy, Japan, the Republic of Korea, the People's Republic of China, South Africa, Taiwan, and the Republic of Turkey: Initiation of Less-Than-Fair Value Investigations*	https://www.gpo.gov/fdsys/pkg/FR-2016-05-05/pdf/2016-10627.pdf
81 FR 27098 May 5, 2016	*Certain Carbon and Alloy Steel Cut-to-Length Plate From Brazil, the People's Republic of China, and the Republic of Korea: Initiation of Countervailing Duty Investigations*	https://www.gpo.gov/fdsys/pkg/FR-2016-05-05/pdf/2016-10631.pdf
81 FR 33705 May 27, 2016	*Certain Carbon and Alloy Steel Cut-to-Length Plate From Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey; Determinations*	https://www.gpo.gov/fdsys/pkg/FR-2016-05-27/pdf/2016-12537.pdf

Citation	Title	Link
81 FR 61666 September 7, 2016	*Certain Carbon and Alloy Steel Cut-to-Length Plate From Austria, Belgium, Brazil, the Republic of Korea, Taiwan, and Turkey; Antidumping and Countervailing Duty Investigations: Preliminary Determinations of Critical Circumstances*	https://www.gpo.gov/fdsys/pkg/FR-2016-09-07/pdf/2016-21501.pdf
81 FR 62871 September 13, 2016	*Certain Carbon and Alloy Steel Cut-to-Length Plate From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination*	https://www.gpo.gov/fdsys/pkg/FR-2016-09-13/pdf/2016-21999.pdf
81 FR 63168 September 14, 2016	*Certain Carbon and Alloy Steel Cut-to-Length Plate From the Republic of Korea: Preliminary Negative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination*	https://www.gpo.gov/fdsys/pkg/FR-2016-09-14/pdf/2016-21997.pdf
81 FR 65337 September 22, 2016	*Certain Carbon and Alloy Steel Cut-to-Length Plate From Brazil, South Africa, and the Republic of Turkey: Affirmative Preliminary Determinations of Sales at Less Than Fair Value*	https://www.gpo.gov/fdsys/pkg/FR-2016-09-22/pdf/2016-22885.pdf
81 FR 70440 October 12, 2016	*Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey; Scheduling of the Final Phase Countervailing Duty and Antidumping Duty Investigations*	https://www.gpo.gov/fdsys/pkg/FR-2016-10-12/pdf/2016-24566.pdf

Citation	Title	Link
81 FR 79431 November 14, 2016	*Certain Carbon and Alloy Steel Cut-To-Length Plate From Belgium: Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination*	https://www.gpo.gov/fdsys/pkg/FR-2016-11-14/pdf/2016-27303.pdf
81 FR 79423 November 14, 2016	*Certain Carbon and Alloy Steel Cut-To-Length Plate From Italy: Preliminary Determination of Sales at Less Than Fair Value, Affirmative Determination of Critical Circumstances, and Postponement of Final Determination*	https://www.gpo.gov/fdsys/pkg/FR-2016-11-14/pdf/2016-27304.pdf
81 FR 79416 November 14, 2016	*Certain Carbon and Alloy Steel Cut-To-Length Plate From Austria: Preliminary Determination of Sales at Less Than Fair Value and Postponement of the Final Determination*	https://www.gpo.gov/fdsys/pkg/FR-2016-11-14/pdf/2016-27305.pdf
81 FR 79420 November 14, 2016	*Certain Carbon and Alloy Steel Cut-To-Length Plate From Taiwan: Preliminary Determination of Sales at Less Than Fair Value*	https://www.gpo.gov/fdsys/pkg/FR-2016-11-14/pdf/2016-27306.pdf
81 FR 79441 November 14, 2016	*Certain Carbon and Alloy Steel Cut-To-Length Plate From the Republic of Korea: Affirmative Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination*	https://www.gpo.gov/fdsys/pkg/FR-2016-11-14/pdf/2016-27311.pdf
81 FR 79450 November 14, 2016	*Certain Carbon and Alloy Steel Cut-To-Length Plate from the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value*	https://www.gpo.gov/fdsys/pkg/FR-2016-11-14/pdf/2016-27312.pdf

Citation	Title	Link
81 FR 79446 November 14, 2016	*Certain Carbon and Alloy Steel Cut-To-Length Plate From the Federal Republic of Germany: Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination*	https://www.gpo.gov/fdsys/pkg/FR-2016-11-14/pdf/2016-27313.pdf
81 FR 79437 November 14, 2016	*Certain Carbon and Alloy Steel Cut-To-Length Plate From France: Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination*	https://www.gpo.gov/fdsys/pkg/FR-2016-11-14/pdf/2016-27314.pdf
81 FR 79427 November 14, 2016	*Certain Carbon and Alloy Steel Cut-To-Length Plate From Japan: Preliminary Determination of Sales at Less Than Fair Value and Postponement of Final Determination*	https://www.gpo.gov/fdsys/pkg/FR-2016-11-14/pdf/2016-27316.pdf
81 FR 85930 November 29, 2016	*Certain Carbon and Alloy Steel Cut-To-Length Plate From the Federal Republic of Germany: Amended Preliminary Determination of Sales at Less Than Fair Value*	https://www.gpo.gov/fdsys/pkg/FR-2016-11-29/pdf/2016-28703.pdf
81 FR 87019 December 2, 2016	*Certain Carbon and Alloy Steel Cut-to-Length Plate From France: Amended Preliminary Determination of Sales at Less Than Fair Value*	https://www.gpo.gov/fdsys/pkg/FR-2016-12-02/pdf/2016-28983.pdf
81 FR 87544 December 5, 2016	*Certain Carbon and Alloy Steel Cut-to-Length Plate From Brazil, South Africa, and the Republic of Turkey: Affirmative Final Determinations of Sales at Less Than Fair Value and Affirmative Final Determinations of Critical Circumstances for Brazil and the Republic of Turkey*	https://www.gpo.gov/fdsys/pkg/FR-2016-12-05/pdf/2016-29071.pdf

Citation	Title	Link
81 FR 90780 December 15, 2016	*Certain Carbon and Alloy Steel Cut-to-Length Plate From France: Correction to the Amended Preliminary Determination of Sales at Less Than Fair Value*	https://www.gpo.gov/fdsys/pkg/FR-2016-12-15/pdf/2016-30148.pdf

APPENDIX B

LIST OF HEARING WITNESSES

CALENDAR OF PUBLIC HEARING

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

Subject:	Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, Korea, South Africa, Taiwan, and Turkey
Inv. Nos.:	701-TA-560-561 and 731-TA-1317-1328 (Final)
Date and Time:	November 30, 2016 - 10:00 a.m.

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

CONGRESSIONAL WITNESS:

The Honorable Peter J. Visclosky, U.S. Representative, 1st District, Indiana

EMBASSY WITNESS:

Embassy of Japan
Washington, DC

The Honorable Jun-ichiro Kuroda, Minister for Economy, Trade, Industry and Energy

OPENING REMARKS:

Petitioners (**Alan H. Price**, Wiley Rein LLP)
Respondents (**R. Will Planert**, Morris Manning & Martin LLP)

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

Kelley Drye & Warren LLP
Washington, DC
on behalf of

ArcelorMittal USA LLC ("AMUSA")

Daniel Mull, Executive Vice President for Sales and Marketing, AMUSA

Robert Insetta, Director of Specialty Plate, AMUSA

Jeffrey Unruh, Director of Plate Products, AMUSA

Pete Trinidad, President, United Steelworkers Local 6787

Gina Beck, Economic Consultant, Georgetown Economic Services

Brad Hudgens, Economic Consultant, Georgetown Economic Services

Paul Rosenthal)
Kathleen W. Cannon)
) – OF COUNSEL
Alan Luberda)
Brooke M. Ringel)

Wiley Rein LLP
Washington, DC
on behalf of

Nucor Corporation ("Nucor")

Randy Skagen, Vice President *and* General Manager, Nucor Steel Tuscaloosa

Jeff Whiteman, Sales Manager, Nucor Steel Hertford County

Phil Bischof, Sales Manager, Nucor Steel Longview, LLC

Denton J. Nordhues, President and Chief Executive Officer,
Leeco Steel, LLC

Alan H. Price)
Christopher B. Weld) – OF COUNSEL
Laura El-Sabaawi)

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

Schagrin Associates
Washington, DC
on behalf of

SSAB Enterprises LLC

Chuck Schmitt, President *and* Chief Executive Officer, SSAB Enterprises LLC

Jeff Moskaluk, Vice President *and* Chief Commercial Officer, SSAB Enterprises LLC

Glenn Gilmore, Trade Supervisor, SSAB Enterprises LLC

Richard Marabito, Chief Financial Officer, Olympic Steel

Roger B. Schagrin)
Paul W. Jameson) – OF COUNSEL
Christopher T. Cloutier)

Cassidy Levy Kent (USA) LLP
Washington, DC
on behalf of

EVRAZ Inc. NA and
JSW Steel (USA) Inc.

Brian Kristofic, Director, Trade and Government Affairs, EVRAZ Inc. NA

Don Hunter, Vice President of Sales, EVRAZ Inc. NA

John Hritz, President *and* Chief Executive Officer, JSW Steel (USA) Inc.

Jason Jamieson, Sr., Vice President Sales, JSW Steel (USA) Inc.

James R. Cannon, Jr.)
) – OF COUNSEL
Robert C. Cassidy, Jr.)

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

deKieffer & Horgan, PLLC
Washington, DC
on behalf of

Aktiengesellschaft der Dillinger Hüttenwerke;
Dillinger France, S.A.; Dillinger America Inc.;
Salzgitter AG; Salzgitter Mannesmann International
USA Inc.; Salzgitter Mannesmann GmbH;
Universal Steel America Inc.; Thyseenkrupp Steel Europe AG;
Thyssenkrupp Steel North America, Inc,; Berg
Steel Pipe Corp. and Friedr. Lohmann GmbH

Ingo Riemer, President and Chief Executive Officer, Berg Steel Pipe Corporation

Dimitris Dimopoulos, Vice President Quality Systems & Supply Chain Management, Berg Steel Pipe Corp

Jim Barber, President, Dillinger America, Inc.

Jim Dougan, Vice President, Economic Consulting Services

Emma Peterson, Staff Economist, Economic Consulting Services

J. Kevin Horgan) – OF COUNSEL

Curtis, Mallet-Prevost, Colt & Mosle LLP
Washington, DC
on behalf of

Japanese Respondents

David Necessary, Material Sourcing Manager, Link-Belt Cranes

Gordon AuBuchon, Executive Vice President, Steel Warehouse Company

Takeshi Esumi, Staff General Manager, JFE Steel Corporation

Satoshi Asukai, Staff Assistant Manager, JFE Steel Corporation

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

Tadaaki Yamaguchi, President, JFE Steel Corporation of America

Yoji Hirata, Senior Manager, Nippon Steel & Sumitomo Metal Corporation ("NSSMC")

Daniel L. Porter)
) – OF COUNSEL
Matthew P. McCullough)

Morris Manning & Martin LLP
Washington, DC
on behalf of

POSCO

Youngjin Kim, Chief Financial Officer, POSCO America

Pyoungsoo Jeon, General Manager, POSCO America

Jaehyun Kim, Sales Manager, POSCO America

Jason Norris, President, Dura-Bond Pipe LLC

Jim Dougan, Vice President, Economic Consulting Services

Emma Peterson, Staff Economist, Economic Consulting Services

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

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

Law Offices of David L. Simon
Washington, DC
on behalf of

Ereğli Demir ve Çelik Fabrikalari T.A.Ş ("Erdemir")

Adalat Kazimli, Director of International Trade, Erdemir

Hakan Bozoğlu, International Trade Manager, Erdemir

David L. Simon)
) – OF COUNSEL
Ayla Simon)

White & Case LLP
Crowell & Moring LLP
Clark Hill PLC
Drinker Biddle & Reath
deKieffer & Horgan, PLLC
Washington, DC
on behalf of

Hitachi Metals, Ltd.; Hitachi Metals America LLC;
voestalpine Grobblech GmbH; Bohler Edelstahl
GmbH & Co KG; Bohler Bleche GmbH & Co KG;
voestalpine USA Corporation; Bohler Uddeholm;
Friedr. Lohmann GmbH, AG der Dillinger Huttenwerke;
Dillinger France S.A.; and Daido Steel Co., Ltd.

Richard O'Hara, President, REO Consulting LLC

Wolfgang Emmerich, Corporate Strategy, voestalpine Edestahl GmbH

Patrick Roche, Vice President Procurement and Logistics, Bohler-Uddeholm Corporation

Mark Vaughn, Vice Chair, National Tooling and Machining Association

Tom Bell, Executive Director, Hitachi Metals America, LLC

Rich Jeniski, Senior Vice President, Hitachi Metals America, LLC

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

Ed Mohrbach, President, PCS Company

Yasushi Kuwayama, General Manager, Sales and Marketing, Daido Steel (America)

Thomas M. Schade, Executive Vice President, International Mold Steel, Inc.

Haruki Ichimura, Associate Senior Staff, Daido Steel Co., Ltd.

Jim Barber, President, Dillinger America

Gregory J. Spak)
Ting-Ting Kao)
Daniel Cannistra)
Benjamin Blase Caryl)
) – OF COUNSEL
Kevin Williams)
Douglas J. Heffner)
J. Kevin Horgan)
Judith Holdsworth)

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

Stemcor USA Inc. (Stemcor")

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

ADDITIONAL WITNESS IN OPPOSITION:

K&L Gates LLP
Washington, DC
on behalf of

The KnifeSource LLC ("KnifeSource")

John E. Halloran, President, Knifesource

Steven F. Hill) – OF COUNSEL

REBUTTAL/CLOSING REMARKS:

Petitioners (**Roger B. Schagrin,** Schagrin Associates)
Respondents (**J. Kevin Horgan**, deKieffer & Horgan, PLLC; and **Jim Dougan**, Economic Consulting Services)

-END-

APPENDIX C

SUMMARY DATA

Table C-1
CTL plate: Summary data concerning the U.S. market, 2013-15, January to September 2015, and January to September 2016
(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year			January to September		Calendar year			Jan-Sept
	2013	2014	2015	2015	2016	2013-15	2013-14	2014-15	2015-16
U.S. consumption quantity:									
Amount	8,819,403	9,931,209	8,287,526	6,620,612	5,971,960	(6.0)	12.6	(16.6)	(9.8)
Producers' share (fn1)	89.8	82.1	82.1	81.5	83.6	(7.7)	(7.7)	0.0	2.1
Importers' share (fn1):									
Austria	0.6	0.5	0.2	0.2	0.2	(0.4)	(0.0)	(0.4)	0.1
Belgium	0.1	0.3	0.3	0.3	0.3	0.2	0.2	(0.1)	0.0
Brazil	0.3	1.4	0.6	0.5	0.1	0.3	1.1	(0.8)	(0.4)
China	0.3	0.5	0.9	0.5	0.6	0.5	0.2	0.4	0.1
France	1.0	1.1	2.6	3.0	1.7	1.6	0.1	1.5	(1.3)
Germany	1.6	0.7	2.8	3.1	2.4	1.3	(0.8)	2.1	(0.7)
Italy	0.5	1.0	0.7	0.8	0.5	0.2	0.5	(0.3)	(0.4)
Japan	0.5	0.8	0.9	1.1	0.5	0.4	0.2	0.2	(0.5)
Korea subject	***	***	***	***	***	***	***	***	***
South Africa	0.1	0.4	0.3	0.2	0.0	0.2	0.3	(0.1)	(0.2)
Taiwan	0.4	0.6	0.4	0.5	0.2	0.0	0.2	(0.2)	(0.3)
Turkey	0.2	1.2	0.3	0.2	0.6	0.1	0.9	(0.9)	0.4
Subject sources	***	***	***	***	***	***	***	***	***
Canada	2.0	1.9	2.0	1.9	2.1	0.0	(0.1)	0.1	0.2
Korea nonsubject	***	***	***	***	***	***	***	***	***
Mexico	0.6	0.8	0.6	0.5	0.7	(0.0)	0.2	(0.2)	0.1
All other sources	1.1	3.6	1.3	1.4	0.8	0.2	2.5	(2.2)	(0.5)
Nonsubject sources	***	***	***	***	***	***	***	***	***
All import sources	10.2	17.9	17.9	18.5	16.4	7.7	7.7	(0.0)	(2.1)
U.S. consumption value:									
Amount	6,883,900	8,346,057	5,817,567	4,844,883	3,676,840	(15.5)	21.2	(30.3)	(24.1)
Producers' share (fn1)	88.4	82.5	80.8	80.5	81.8	(7.5)	(5.9)	(1.6)	1.3
Importers' share (fn1):									
Austria	0.8	0.6	0.3	0.3	0.4	(0.5)	(0.2)	(0.4)	0.1
Belgium	0.1	0.4	0.4	0.4	0.5	0.2	0.3	(0.0)	0.1
Brazil	0.2	1.1	0.5	0.5	0.1	0.3	0.9	(0.7)	(0.4)
China	0.7	0.8	1.3	1.0	0.9	0.6	0.0	0.5	(0.1)
France	1.2	1.3	2.9	3.1	2.0	1.6	0.1	1.6	(1.2)
Germany	1.9	1.2	3.3	3.5	3.4	1.4	(0.8)	2.2	(0.1)
Italy	0.5	0.9	0.7	0.8	0.5	0.2	0.4	(0.2)	(0.3)
Japan	0.7	0.7	1.0	1.1	0.6	0.3	0.0	0.3	(0.5)
Korea subject	***	***	***	***	***	***	***	***	***
South Africa	0.0	0.3	0.2	0.2	0.0	0.1	0.2	(0.1)	(0.2)
Taiwan	0.3	0.5	0.4	0.4	0.1	0.1	0.2	(0.1)	(0.3)
Turkey	0.2	0.9	0.2	0.2	0.4	0.1	0.7	(0.7)	0.2
Subject sources	***	***	***	***	***	***	***	***	***
Canada	2.1	1.9	2.0	1.9	2.1	(0.2)	(0.2)	0.0	0.2
Korea nonsubject	***	***	***	***	***	***	***	***	***
Mexico	0.5	0.7	0.4	0.4	0.5	(0.1)	0.2	(0.3)	0.1
All other sources	1.4	3.6	1.7	1.7	1.2	0.3	2.2	(1.9)	(0.5)
Nonsubject sources	***	***	***	***	***	***	***	***	***
All import sources	11.6	17.5	19.2	19.5	18.2	7.5	5.9	1.6	(1.3)
U.S. imports from:									
Austria:									
Quantity	50,292	52,031	13,305	11,883	14,564	(73.5)	3.5	(74.4)	22.6
Value	53,016	51,434	15,353	13,569	13,983	(71.0)	(3.0)	(70.2)	3.1
Unit value	$1,054	$989	$1,154	$1,142	$960	9.5	(6.2)	16.7	(15.9)
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Belgium:									
Quantity	7,873	32,400	21,023	18,544	17,281	167.0	311.5	(35.1)	(6.8)
Value	8,676	32,544	20,921	18,239	18,434	141.1	275.1	(35.7)	1.1
Unit value	$1,102	$1,004	$995	$984	$1,067	(9.7)	(8.9)	(0.9)	8.5
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Brazil:									
Quantity	22,152	137,460	46,183	34,348	8,428	108.5	520.5	(66.4)	(75.5)
Value	14,890	95,565	28,386	23,134	3,567	90.6	541.8	(70.3)	(84.6)
Unit value	$672	$695	$615	$674	$423	(8.6)	3.4	(11.6)	(37.2)
Ending inventory quantity	***	***	***	***	***	***	***	***	***
China:									
Quantity	29,221	47,992	72,239	32,943	37,718	147.2	64.2	50.5	14.5
Value	50,150	64,801	74,601	48,600	33,370	48.8	29.2	15.1	(31.3)
Unit value	$1,716	$1,350	$1,033	$1,475	$885	(39.8)	(21.3)	(23.5)	(40.0)
Ending inventory quantity	***	***	***	***	***	***	***	***	***
France:									
Quantity	87,727	111,176	217,558	199,409	104,263	148.0	26.7	95.7	(47.7)
Value	85,196	108,137	167,625	151,914	72,426	96.8	26.9	55.0	(52.3)
Unit value	$971	$973	$770	$762	$695	(20.7)	0.2	(20.8)	(8.8)
Ending inventory quantity	***	***	***	***	***	***	***	***	***

Table continued on next page.

Table C-1--Continued

CTL plate: Summary data concerning the U.S. market, 2013-15, January to September 2015, and January to September 2016

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

	Reported data					Period changes			
	Calendar year			January to September		Calendar year			Jan-Sept
	2013	2014	2015	2015	2016	2013-15	2013-14	2014-15	2015-16
U.S. imports from:--Continued									
Germany:									
Quantity	138,540	72,631	234,810	205,366	142,329	69.5	(47.6)	223.3	(30.7)
Value	132,899	97,294	194,609	169,151	123,619	46.4	(26.8)	100.0	(26.9)
Unit value	$959	$1,340	$829	$824	$869	(13.6)	39.6	(38.1)	5.5
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Italy:									
Quantity	46,508	97,326	59,455	55,472	28,915	27.8	109.3	(38.9)	(47.9)
Value	34,207	71,988	40,484	38,055	19,507	18.4	110.4	(43.8)	(48.7)
Unit value	$735	$740	$681	$686	$675	(7.4)	0.6	(7.9)	(1.7)
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Japan:									
Quantity	48,325	76,002	77,500	71,632	31,959	60.4	57.3	2.0	(55.4)
Value	49,909	61,615	57,964	53,748	21,497	16.1	23.5	(5.9)	(60.0)
Unit value	$1,033	$811	$748	$750	$673	(27.6)	(21.5)	(7.7)	(10.4)
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Korea:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
South Africa:									
Quantity	5,174	38,252	21,495	15,401	93	315.4	639.3	(43.8)	(99.4)
Value	3,398	23,436	10,626	8,275	39	212.7	589.8	(54.7)	(99.5)
Unit value	$657	$613	$494	$537	$414	(24.7)	(6.7)	(19.3)	(23.0)
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Taiwan:									
Quantity	34,302	58,472	35,482	30,610	10,600	3.4	70.5	(39.3)	(65.4)
Value	23,061	41,149	22,986	20,586	5,232	(0.3)	78.4	(44.1)	(74.6)
Unit value	$672	$704	$648	$673	$494	(3.6)	4.7	(7.9)	(26.6)
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Turkey:									
Quantity	20,079	116,494	23,281	15,070	35,575	15.9	480.2	(80.0)	136.1
Value	12,432	73,789	13,425	10,083	14,789	8.0	493.5	(81.8)	46.7
Unit value	$619	$633	$577	$669	$416	(6.9)	2.3	(9.0)	(37.9)
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Subject source:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Canada:									
Quantity	175,743	185,888	166,604	128,464	126,234	(5.2)	5.8	(10.4)	(1.7)
Value	147,708	161,584	113,848	90,253	75,703	(22.9)	9.4	(29.5)	(16.1)
Unit value	$840	$869	$683	$703	$600	(18.7)	3.4	(21.4)	(14.6)
Korea nonsubject:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Mexico:									
Quantity	55,966	83,862	49,516	36,105	40,682	(11.5)	49.8	(41.0)	12.7
Value	34,706	58,271	24,985	19,086	17,886	(28.0)	67.9	(57.1)	(6.3)
Unit value	$620	$695	$505	$529	$440	(18.6)	12.0	(27.4)	(16.8)
All other sources:									
Quantity	97,054	354,289	110,617	89,938	49,243	14.0	265.0	(68.8)	(45.2)
Value	95,956	301,008	99,029	82,185	44,007	3.2	213.7	(67.1)	(46.5)
Unit value	$989	$850	$895	$914	$894	(9.5)	(14.1)	5.4	(2.2)
Nonsubject sources:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
All sources:									
Quantity	897,417	1,773,391	1,479,800	1,226,867	979,304	64.9	97.6	(16.6)	(20.2)
Value	799,507	1,462,312	1,114,132	944,466	668,151	39.4	82.9	(23.8)	(29.3)
Unit value	$891	$825	$753	$770	$682	(15.5)	(7.4)	(8.7)	(11.4)
Ending inventory quantity	***	***	***	***	***	***	***	***	***

Table continued on next page.

Table C-1--Continued

CTL plate: Summary data concerning the U.S. market, 2013-15, January to September 2015, and January to September 2016

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

	Reported data					Period changes			
	Calendar year			January to September		Calendar year			Jan-Sept
	2013	2014	2015	2015	2016	2013-15	2013-14	2014-15	2015-16
U.S. producers':									
Average capacity quantity	12,912,704	12,475,739	12,487,100	9,341,579	9,340,560	(3.3)	(3.4)	0.1	(0.0)
Production quantity	8,568,823	9,242,567	7,528,917	5,979,845	5,536,626	(12.1)	7.9	(18.5)	(7.4)
Capacity utilization (fn1)	66.4	74.1	60.3	64.0	59.3	(6.1)	7.7	(13.8)	(4.7)
U.S. shipments:									
Quantity	7,921,986	8,157,818	6,807,726	5,393,745	4,992,656	(14.1)	3.0	(16.5)	(7.4)
Value	6,084,393	6,883,745	4,703,435	3,900,417	3,008,689	(22.7)	13.1	(31.7)	(22.9)
Unit value	$768	$844	$691	$723	$603	(10.0)	9.9	(18.1)	(16.7)
Channels of distribution:									
Share to distributors (fn1)	49.9	47.0	43.7	43.5	49.6	(6.2)	(2.9)	(3.3)	6.1
Share to end users (fn1)	50.1	53.0	56.3	56.5	50.4	6.2	2.9	3.3	(6.1)
Export shipments:									
Quantity	736,490	912,996	807,911	621,903	652,762	9.7	24.0	(11.5)	5.0
Value	582,251	779,486	573,212	466,475	387,287	(1.6)	33.9	(26.5)	(17.0)
Unit value	$791	$854	$709	$750	$593	(10.3)	8.0	(16.9)	(20.9)
Ending inventory quantity	823,720	999,797	913,079	916,457	806,036	10.8	21.4	(8.7)	(12.0)
Inventories/total shipments (fn1)	9.5	11.0	12.0	11.4	10.7	2.5	1.5	1.0	(0.7)
Production workers	4,579	4,823	4,591	4,694	4,296	0.3	5.3	(4.8)	(8.5)
Hours worked (1,000s)	10,000	10,688	9,687	7,707	6,751	(3.1)	6.9	(9.4)	(12.4)
Wages paid ($1,000)	344,601	383,957	333,810	266,096	242,910	(3.1)	11.4	(13.1)	(8.7)
Hourly wages (dollars)	$34.46	$35.92	$34.46	$34.53	$35.98	(0.0)	4.2	(4.1)	4.2
Productivity (short tons per 1,000 hours)	856.9	864.8	777.2	775.9	820.1	(9.3)	0.9	(10.1)	5.7
Unit labor costs	$40.22	$41.54	$44.34	$44.50	$43.87	10.2	3.3	6.7	(1.4)
Net sales:									
Quantity	7,523,574	7,841,261	6,559,704	5,120,680	4,879,855	(12.8)	4.2	(16.3)	(4.7)
Value	5,929,345	6,698,463	4,669,052	3,785,455	2,931,153	(21.3)	13.0	(30.3)	(22.6)
Unit value	$788	$854	$712	$739	$601	(9.7)	8.4	(16.7)	(18.7)
Cost of goods sold (COGS)	5,630,385	5,997,554	4,448,239	3,515,966	2,753,138	(21.0)	6.5	(25.8)	(21.7)
Gross profit or (loss)	298,960	700,909	220,813	269,489	178,015	(26.1)	134.4	(68.5)	(33.9)
SG&A expenses	208,649	205,412	198,275	156,796	142,208	(5.0)	(1.6)	(3.5)	(9.3)
Operating income or (loss)	90,311	495,497	22,538	112,693	35,807	(75.0)	448.7	(95.5)	(68.2)
Net income or (loss)	***	***	***	***	***	***	***	***	***
Capital expenditures	121,588	169,176	122,035	84,586	74,049	0.4	39.1	(27.9)	(12.5)
Unit COGS	$748	$765	$678	$687	$564	(9.4)	2.2	(11.3)	(17.8)
Unit SG&A expenses	$28	$26	$30	$31	$29	9.0	(5.5)	15.4	(4.8)
Unit operating income or (loss)	$12	$63	$3	$22	$7	(71.4)	426.4	(94.6)	(66.7)
Unit net income or (loss)	***	***	***	***	***	***	***	***	***
COGS/sales (fn1)	95.0	89.5	95.3	92.9	93.9	0.3	(5.4)	5.7	1.0
Operating income or (loss)/sales (fn1)	1.5	7.4	0.5	3.0	1.2	(1.0)	5.9	(6.9)	(1.8)
Net income or (loss)/sales (fn1)	***	***	***	***	***	***	***	***	***

Notes:

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

Source: Compiled from data submitted in response to Commission questionnaires and modified official U.S. import statistics (see Part IV for details).

Table C-2
Tool and high speed steel CTL plate: U.S. imports, 2013-15, January to September 2015, and January to September 2016
(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year			January to September		Calendar year			Jan-Sept
	2013	2014	2015	2015	2016	2013-15	2013-14	2014-15	2015-16
U.S. consumption quantity:									
Amount	***	***	***	***	***	***	***	***	***
Producers' share (fn1)	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
Austria	***	***	***	***	***	***	***	***	***
Belgium	***	***	***	***	***	***	***	***	***
Brazil	***	***	***	***	***	***	***	***	***
China	***	***	***	***	***	***	***	***	***
France	***	***	***	***	***	***	***	***	***
Germany	***	***	***	***	***	***	***	***	***
Italy	***	***	***	***	***	***	***	***	***
Japan	***	***	***	***	***	***	***	***	***
Korea subject	***	***	***	***	***	***	***	***	***
South Africa	***	***	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***	***	***	***
Canada	***	***	***	***	***	***	***	***	***
Korea nonsubject	***	***	***	***	***	***	***	***	***
Mexico	***	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***	***	***	***
All import sources	***	***	***	***	***	***	***	***	***
U.S. consumption value:									
Amount	***	***	***	***	***	***	***	***	***
Producers' share (fn1)	***	***	***	***	***	***	***	***	***
Importers' share (fn1):	***	***	***	***	***	***	***	***	***
Austria	***	***	***	***	***	***	***	***	***
Belgium	***	***	***	***	***	***	***	***	***
Brazil	***	***	***	***	***	***	***	***	***
China	***	***	***	***	***	***	***	***	***
France	***	***	***	***	***	***	***	***	***
Germany	***	***	***	***	***	***	***	***	***
Italy	***	***	***	***	***	***	***	***	***
Japan	***	***	***	***	***	***	***	***	***
Korea subject	***	***	***	***	***	***	***	***	***
South Africa	***	***	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***	***	***	***
Canada	***	***	***	***	***	***	***	***	***
Korea nonsubject	***	***	***	***	***	***	***	***	***
Mexico	***	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***	***	***	***
All import sources	***	***	***	***	***	***	***	***	***
U.S. imports from:									
Austria:									
Quantity	2,633	3,891	3,547	2,738	7	34.7	47.8	(8.8)	(99.7)
Value	6,273	5,525	6,685	5,394	63	6.6	(11.9)	21.0	(98.8)
Unit value	$2,382	$1,420	$1,884	$1,970	$8,465	(20.9)	(40.4)	32.7	329.7
Belgium:									
Quantity	22	9	180	180	3	722.3	(57.6)	1,837.1	(98.3)
Value	83	33	236	236	20	183.0	(59.9)	605.5	(91.6)
Unit value	$3,796	$3,588	$1,307	$1,307	$6,295	(65.6)	(5.5)	(63.6)	381.7
Brazil:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
China:									
Quantity	4,908	4,162	6,275	5,572	672	27.8	(15.2)	50.8	(87.9)
Value	22,579	23,407	26,619	22,417	9,201	17.9	3.7	13.7	(59.0)
Unit value	$4,600	$5,625	$4,242	$4,023	$13,687	(7.8)	22.3	(24.6)	240.2
France:									
Quantity	3,045	3,282	3,374	3,049	0	10.8	7.8	2.8	(100.0)
Value	7,853	8,068	8,492	7,603	0	8.1	2.7	5.3	(100.0)
Unit value	$2,579	$2,458	$2,517	$2,493	$0	(2.4)	(4.7)	2.4	(100.0)
Germany:									
Quantity	1,164	1,463	1,751	1,442	46	50.4	25.6	19.7	(96.8)
Value	5,617	7,123	6,265	5,450	373	11.5	26.8	(12.0)	(93.2)
Unit value	$4,825	$4,870	$3,578	$3,781	$8,078	(25.8)	0.9	(26.5)	113.7
Italy:									
Quantity	9	0	2	2	0	(79.6)	(100.0)	fn2	(100.0)
Value	26	0	3	3	0	(88.6)	(100.0)	fn2	(100.0)
Unit value	$2,861	$0	$1,597	$1,597	$0	(44.2)	(100.0)	fn2	(100.0)

Table continued on next page.

Table C-2--Continued

Tool and high speed steel CTL plate: U.S. imports, 2013-15, January to September 2015, and January to September 2016

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

	Reported data					Period changes			
	Calendar year			January to September		Calendar year			Jan-Sept
	2013	2014	2015	2015	2016	2013-15	2013-14	2014-15	2015-16
Japan:									
Quantity	85	434	305	292	169	258.3	410.0	(29.7)	(42.1)
Value	769	2,058	2,197	2,024	1,509	185.6	167.5	6.8	(25.5)
Unit value	$9,036	$4,739	$7,201	$6,929	$8,925	(20.3)	(47.6)	51.9	28.8
Korea subject:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
South Africa:									
Quantity	0	0	0	0	0	fn2	fn2	fn2	fn2
Value	0	0	0	0	0	fn2	fn2	fn2	fn2
Unit value	$0	$0	$0	$0	$0	fn2	fn2	fn2	fn2
Taiwan:									
Quantity	0	0	0	0	0	fn2	fn2	fn2	fn2
Value	0	0	0	0	0	fn2	fn2	fn2	fn2
Unit value	$0	$0	$0	$0	$0	fn2	fn2	fn2	fn2
Turkey:									
Quantity	0	0	0	0	0	fn2	fn2	fn2	fn2
Value	0	0	0	0	0	fn2	fn2	fn2	fn2
Unit value	$0	$0	$0	$0	$0	fn2	fn2	fn2	fn2
Subject source:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Canada:									
Quantity	0	8	77	77	2	fn2	fn2	820.0	(97.6)
Value	0	10	257	257	35	fn2	fn2	2,422.2	(86.3)
Unit value	$0	$1,219	$3,342	$3,342	$19,129	fn2	fn2	174.1	472.4
Korea nonsubject:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Mexico:									
Quantity	0	0	0	0	0	fn2	fn2	fn2	fn2
Value	0	0	0	0	0	fn2	fn2	fn2	fn2
Unit value	$0	$0	$0	$0	$0	fn2	fn2	fn2	fn2
All other sources:									
Quantity	151	203	574	574	16	281.5	34.8	182.9	(97.1)
Value	973	877	1,553	1,553	316	59.6	(9.9)	77.1	(79.7)
Unit value	$6,460	$4,319	$2,703	$2,703	$19,294	(58.2)	(33.1)	(37.4)	613.8
Nonsubject sources:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
All sources:									
Quantity	12,017	13,472	16,323	14,164	916	35.8	12.1	21.2	(93.5)
Value	44,173	47,172	53,581	46,211	11,516	21.3	6.8	13.6	(75.1)
Unit value	$3,676	$3,502	$3,283	$3,263	$12,569	(10.7)	(4.7)	(6.3)	285.3

Table continued on next page.

Table C-2--Continued
Tool and high speed steel CTL plate: U.S. imports, 2013-15, January to September 2015, and January to September 2016
(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year			January to September		Calendar year			Jan-Sept
	2013	2014	2015	2015	2016	2013-15	2013-14	2014-15	2015-16
U.S. producers':									
Average capacity quantity	***	***	***	***	***	***	***	***	***
Production quantity	***	***	***	***	***	***	***	***	***
Capacity utilization (fn1)	***	***	***	***	***	***	***	***	***
U.S. shipments:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Channels of distribution:									
Share to distributors (fn1)	***	***	***	***	***	***	***	***	***
Share to end users (fn1)	***	***	***	***	***	***	***	***	***
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)	***	***	***	***	***	***	***	***	***
Productivity (short tons per 1,000 hours)	***	***	***	***	***	***	***	***	***
Unit labor costs	***	***	***	***	***	***	***	***	***
Net sales:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Cost of goods sold (COGS)	***	***	***	***	***	***	***	***	***
Gross profit or (loss)	***	***	***	***	***	***	***	***	***
SG&A expenses	***	***	***	***	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***	***	***	***	***
Net income or (loss)	***	***	***	***	***	***	***	***	***
Capital expenditures	***	***	***	***	***	***	***	***	***
Unit COGS	***	***	***	***	***	***	***	***	***
Unit SG&A expenses	***	***	***	***	***	***	***	***	***
Unit operating income or (loss)	***	***	***	***	***	***	***	***	***
Unit net income or (loss)	***	***	***	***	***	***	***	***	***
COGS/sales (fn1)	***	***	***	***	***	***	***	***	***
Operating income or (loss)/sales (fn1)	***	***	***	***	***	***	***	***	***
Net income or (loss)/sales (fn1)	***	***	***	***	***	***	***	***	***

Notes:

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

Tool steel.--Alloy steels which contain the following combinations of elements in the quantity by weight respectively indicated: (i) more than 1.2 percent carbon and more than 10.5 percent chromium; or (ii) not less than 0.3 percent carbon and 1.25 percent or more but less than 10.5 percent chromium; or (iii) not less than 0.85 percent carbon and 1 percent to 1.8 percent, inclusive, manganese; or (iv) 0.9 percent to 1.2 percent, inclusive, chromium and 0.9 percent to 1.4 percent, inclusive, molybdenum; or (v) not less than 0.5 percent carbon and not less than 3.5 percent molybdenum, or (vi) not less than 0.5 percent carbon and not less than 5.5 percent tungsten.

High speed steel.--Alloy steel containing, with or without other elements, at least two of the three elements molybdenum, tungsten and vanadium with a combined content by weight of 7 percent or more, 0.6 percent or more of carbon and 3 to 6 percent of chromium.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS numbers 7225.40.1110, 7225.40.1180, 7225.40.1190, and 7226.20.0000, however, staff has exluded from the compilation for tool and high speed steel entries from *** as being unlikely tool and high speed steel.

Table C-3
All types of CTL plate excluding tool and high speed steel CTL plate: U.S. imports, 2013-15, January to September 2015, and January to September 2016
(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year			January to September		Calendar year			Jan-Sept
	2013	2014	2015	2015	2016	2013-15	2013-14	2014-15	2015-16
U.S. consumption quantity:									
Amount	***	***	***	***	***	***	***	***	***
Producers' share (fn1)	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
Austria	***	***	***	***	***	***	***	***	***
Belgium	***	***	***	***	***	***	***	***	***
Brazil	***	***	***	***	***	***	***	***	***
China	***	***	***	***	***	***	***	***	***
France	***	***	***	***	***	***	***	***	***
Germany	***	***	***	***	***	***	***	***	***
Italy	***	***	***	***	***	***	***	***	***
Japan	***	***	***	***	***	***	***	***	***
Korea subject	***	***	***	***	***	***	***	***	***
South Africa	***	***	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***	***	***	***
Canada	***	***	***	***	***	***	***	***	***
Korea nonsubject	***	***	***	***	***	***	***	***	***
Mexico	***	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***	***	***	***
All import sources	***	***	***	***	***	***	***	***	***
U.S. consumption value:									
Amount	***	***	***	***	***	***	***	***	***
Producers' share (fn1)	***	***	***	***	***	***	***	***	***
Importers' share (fn1):									
Austria	***	***	***	***	***	***	***	***	***
Belgium	***	***	***	***	***	***	***	***	***
Brazil	***	***	***	***	***	***	***	***	***
China	***	***	***	***	***	***	***	***	***
France	***	***	***	***	***	***	***	***	***
Germany	***	***	***	***	***	***	***	***	***
Italy	***	***	***	***	***	***	***	***	***
Japan	***	***	***	***	***	***	***	***	***
Korea subject	***	***	***	***	***	***	***	***	***
South Africa	***	***	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***	***	***	***
Canada	***	***	***	***	***	***	***	***	***
Korea nonsubject	***	***	***	***	***	***	***	***	***
Mexico	***	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***	***	***	***
All import sources	***	***	***	***	***	***	***	***	***
U.S. imports from:									
Austria:									
Quantity	47,658	48,140	9,758	9,146	14,556	(79.5)	1.0	(79.7)	59.2
Value	46,743	45,909	8,668	8,175	13,920	(81.5)	(1.8)	(81.1)	70.3
Unit value	$981	$954	$888	$894	$956	(9.4)	(2.8)	(6.9)	7.0
Belgium:									
Quantity	7,851	32,391	20,843	18,363	17,277	165.5	312.6	(35.7)	(5.9)
Value	8,593	32,511	20,685	18,003	18,414	140.7	278.4	(36.4)	2.3
Unit value	$1,094	$1,004	$992	$980	$1,066	(9.3)	(8.3)	(1.1)	8.7
Brazil:									
Quantity	22,152	137,460	45,945	34,110	8,428	107.4	520.5	(66.6)	(75.3)
Value	14,890	95,565	27,111	21,859	3,567	82.1	541.8	(71.6)	(83.7)
Unit value	$672	$695	$590	$641	$423	(12.2)	3.4	(15.1)	(34.0)
China:									
Quantity	24,313	43,830	65,965	27,371	37,045	171.3	80.3	50.5	35.3
Value	27,571	41,394	47,982	26,183	24,169	74.0	50.1	15.9	(7.7)
Unit value	$1,134	$944	$727	$957	$652	(35.9)	(16.7)	(23.0)	(31.8)
France:									
Quantity	84,683	107,895	214,184	196,360	104,263	152.9	27.4	98.5	(46.9)
Value	77,342	100,070	159,132	144,311	72,426	105.8	29.4	59.0	(49.8)
Unit value	$913	$927	$743	$735	$695	(18.7)	1.5	(19.9)	(5.5)
Germany:									
Quantity	137,376	71,168	233,059	203,925	142,283	69.7	(48.2)	227.5	(30.2)
Value	127,282	90,171	188,344	163,701	123,246	48.0	(29.2)	108.9	(24.7)
Unit value	$927	$1,267	$808	$803	$866	(12.8)	36.7	(36.2)	7.9
Italy:									
Quantity	46,499	97,326	59,453	55,470	28,915	27.9	109.3	(38.9)	(47.9)
Value	34,181	71,988	40,481	38,052	19,507	18.4	110.6	(43.8)	(48.7)
Unit value	$735	$740	$681	$686	$675	(7.4)	0.6	(7.9)	(1.7)

Table continued on next page.

Table C-3--Continued

All types of CTL plate excluding tool and high speed steel CTL plate: U.S. imports, 2013-15, January to September 2015, and January to September 2016

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

	Reported data					Period changes			
	Calendar year			January to September		Calendar year			Jan-Sept
	2013	2014	2015	2015	2016	2013-15	2013-14	2014-15	2015-16
Japan:									
Quantity	48,240	75,568	77,195	71,340	31,790	60.0	56.6	2.2	(55.4)
Value	49,140	59,557	55,767	51,724	19,988	13.5	21.2	(6.4)	(61.4)
Unit value	$1,019	$788	$722	$725	$629	(29.1)	(22.6)	(8.3)	(13.3)
Korea subject:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
South Africa:									
Quantity	5,174	38,252	21,495	15,401	93	315.4	639.3	(43.8)	(99.4)
Value	3,398	23,436	10,626	8,275	39	212.7	589.8	(54.7)	(99.5)
Unit value	$657	$613	$494	$537	$414	(24.7)	(6.7)	(19.3)	(23.0)
Taiwan:									
Quantity	34,302	58,472	35,482	30,610	10,600	3.4	70.5	(39.3)	(65.4)
Value	23,061	41,149	22,986	20,586	5,232	(0.3)	78.4	(44.1)	(74.6)
Unit value	$672	$704	$648	$673	$494	(3.6)	4.7	(7.9)	(26.6)
Turkey:									
Quantity	20,079	116,494	23,281	15,070	35,575	15.9	480.2	(80.0)	136.1
Value	12,432	73,789	13,425	10,083	14,789	8.0	493.5	(81.8)	46.7
Unit value	$619	$633	$577	$669	$416	(6.9)	2.3	(9.0)	(37.9)
Subject source:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Canada:									
Quantity	175,743	185,880	166,527	128,387	126,232	(5.2)	5.8	(10.4)	(1.7)
Value	147,708	161,574	113,591	89,996	75,668	(23.1)	9.4	(29.7)	(15.9)
Unit value	$840	$869	$682	$701	$599	(18.8)	3.4	(21.5)	(14.5)
Korea nonsubject:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Mexico:									
Quantity	55,966	83,862	49,516	36,105	40,682	(11.5)	49.8	(41.0)	12.7
Value	34,706	58,271	24,985	19,086	17,886	(28.0)	67.9	(57.1)	(6.3)
Unit value	$620	$695	$505	$529	$440	(18.6)	12.0	(27.4)	(16.8)
All other sources:									
Quantity	96,904	354,086	110,043	89,364	49,227	13.6	265.4	(68.9)	(44.9)
Value	94,983	300,131	97,476	80,633	43,691	2.6	216.0	(67.5)	(45.8)
Unit value	$980	$848	$886	$902	$888	(9.6)	(13.5)	4.5	(1.6)
Nonsubject sources:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
All sources:									
Quantity	885,400	1,759,919	1,463,477	1,212,703	978,388	65.3	98.8	(16.8)	(19.3)
Value	755,333	1,415,140	1,060,551	898,255	656,635	40.4	87.4	(25.1)	(26.9)
Unit value	$853	$804	$725	$741	$671	(15.1)	(5.7)	(9.9)	(9.4)

Table continued on next page.

Table C-3--Continued

All types of CTL plate excluding tool and high speed steel CTL plate: U.S. imports, 2013-15, January to September 2015, and January to September 2016

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

	Reported data					Period changes			
	Calendar year			January to September		Calendar year			Jan-Sept
	2013	2014	2015	2015	2016	2013-15	2013-14	2014-15	2015-16
U.S. producers':									
Average capacity quantity	***	***	***	***	***	***	***	***	***
Production quantity	***	***	***	***	***	***	***	***	***
Capacity utilization (fn1)	***	***	***	***	***	***	***	***	***
U.S. shipments:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Channels of distribution:									
Share to distributors (fn1)	***	***	***	***	***	***	***	***	***
Share to end users (fn1)	***	***	***	***	***	***	***	***	***
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)	***	***	***	***	***	***	***	***	***
Productivity (short tons per 1,000 hours)	***	***	***	***	***	***	***	***	***
Unit labor costs	***	***	***	***	***	***	***	***	***
Net sales:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Cost of goods sold (COGS)	***	***	***	***	***	***	***	***	***
Gross profit or (loss)	***	***	***	***	***	***	***	***	***
SG&A expenses	***	***	***	***	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***	***	***	***	***
Net income or (loss)	***	***	***	***	***	***	***	***	***
Capital expenditures	***	***	***	***	***	***	***	***	***
Unit COGS	***	***	***	***	***	***	***	***	***
Unit SG&A expenses	***	***	***	***	***	***	***	***	***
Unit operating income or (loss)	***	***	***	***	***	***	***	***	***
Unit net income or (loss)	***	***	***	***	***	***	***	***	***
COGS/sales (fn1)	***	***	***	***	***	***	***	***	***
Operating income or (loss)/sales (fn1)	***	***	***	***	***	***	***	***	***
Net income or (loss)/sales (fn1)	***	***	***	***	***	***	***	***	***

Notes:

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

Source: Difference between tables C-1 and C-2.

APPENDIX D

RESPONSES TO QUESTIONS REGARDING AVAILABILITY OF CTL PLATE

Purchasers, importers, and U.S. producers were asked questions regarding the availability of CTL plate in the U.S. market. In particular, purchasers were asked a series of questions about their purchases and experience obtaining types of CTL plate. These questions were:

Certain grades/types/sizes only available one source.--Are certain grades/types/sizes of CTL plate only available from certain sources?

Purchases from one country only.— If your firm has purchased CTL plate from only one country, please explain the reasons for doing so.

Purchases certain grades from one country only.— If your firm has purchased certain grades/specifications of CTL plate from only one country, please explain the reasons for doing so and identify the grade/specification and country.

Country preferences.--Do you or your customers ever specifically order CTL plate from one country in particular over other possible sources of supply, or with respect to specific grades/specifications of steel over other sources?

Availability of supply.--Has the availability of CTL plate in the U.S. market changed since January 1, 2013?

Supply constraints.--Has any firm refused, declined, or been unable to supply your firm with CTL plate since January 1, 2013? Specifically regarding domestic or import suppliers ability to provide specific types of CTL plate/product specifications.

Table D-1 presents the narrative responses provided by purchasers to these questions. Tables D-2 and D-3 present responses by importers and U.S. producers, respectively, to whether certain grades/types/sizes of CTL plate are only available from certain sources.

Table D-1
CTL plate: U.S. purchasers' responses

* * * * * * *

Table D-2
CTL plate: U.S. importers' responses regarding certain grades/types/sizes of CTL plate only available from one source

* * * * * * *

Table D-3
CTL plate: U.S. producers' responses regarding certain grades/types/sizes of CTL plate only available from one source

* * * * * * *

APPENDIX E

MONTHLY U.S. IMPORTS

Table E-1
CTL plate: U.S. imports, by month, January 2013 through September 2016

Month	U.S. imports from						
	Austria	Belgium	Brazil	China	France	Germany	Italy
	Quantity (short tons)						
2013--							
January	2,600	845	5,855	1,217	1,686	3,280	1,472
February	1,358	2	2,647	191	23,356	30,105	171
March	7,322	1,053	371	867	1,958	4,299	4,444
April	2,154	2,180	6,756	2,303	22,032	39,952	493
May	5,299	426	4,780	5,221	1,969	1,082	7,767
June	4,860	214	0	5,876	688	13,040	9,530
July	3,844	406	0	965	5,858	3,249	2,441
August	5,511	399	1,744	1,047	602	1,718	1,065
September	2,475	389	0	4,401	15,147	4,896	12,138
October	4,795	45	0	2,467	1,674	20,346	1,912
November	1,566	289	0	1,775	14,540	12,273	1,140
December	8,508	1,624	0	3,099	3,347	4,299	3,936
2014--							
January	2,501	753	10,495	1,503	3,686	2,871	259
February	3,131	2,441	0	1,965	12,464	2,391	5,191
March	3,507	2,413	13,732	987	2,064	8,940	1,677
April	8,287	738	13,700	9,193	8,230	2,780	569
May	5,365	1,006	12,356	1,199	1,665	3,873	4,547
June	6,462	2,066	10,587	1,158	8,579	5,713	13,454
July	12,531	2,582	17,190	3,130	7,425	4,045	9,779
August	1,869	2,627	12,162	5,999	3,224	7,439	13,133
September	2,903	3,650	6,448	3,484	4,759	5,138	11,739
October	2,354	2,506	25,051	6,709	10,819	10,434	5,848
November	399	628	5,084	7,439	27,109	3,328	12,533
December	2,722	10,991	10,655	5,226	26,272	16,195	18,597

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Table E-1—Continued
CTL plate: U.S. imports, by month, January 2013 through September 2016

Month	U.S. imports from						
	Austria	Belgium	Brazil	China	France	Germany	Italy
	Quantity (short tons)						
2015--							
January	928	5,504	253	6,617	39,835	25,829	7,873
February	866	1,775	4,525	3,678	37,739	36,047	15,515
March	1,110	2,197	11,276	1,176	19,607	14,406	2,648
April	1,525	1,899	6,001	8,387	20,822	16,799	1,320
May	2,208	1,616	964	2,743	17,518	19,747	20,634
June	1,183	1,779	7,792	2,346	18,713	23,620	3,443
July	1,203	1,137	1,102	3,284	15,032	28,214	1,353
August	1,782	1,938	2,220	3,835	1,434	3,793	2,431
September	1,078	698	214	879	33,435	37,410	255
October	517	826	2,225	2,419	3,637	3,334	406
November	451	492	9,478	2,320	1,653	3,659	1,186
December	454	1,161	132	34,557	13,070	22,585	2,391
2016--							
January	516	931	1,349	23,079	1,495	31,646	271
February	1,514	1,090	0	2,822	508	12,239	3,766
March	679	704	0	725	44,188	2,185	565
April	500	1,972	4,398	1,223	1,081	3,025	1,060
May	1,119	1,860	1,926	870	628	31,023	1,748
June	3,064	4,561	744	871	16,486	8,260	862
July	2,356	1,167	0	451	40,789	5,128	10,380
August	1,397	1,361	11	3,277	428	29,093	1,980
September	3,418	3,635	0	4,400	690	19,974	8,284

Table continued on next page.

Table E-1—Continued
CTL plate: U.S. imports, by month, January 2013 through September 2016

Month	U.S. imports from					
	Japan	Korea subject	South Africa	Taiwan	Turkey	Subject sources
	Quantity (short tons)					
2013--						
January	2,668	***	242	456	0	***
February	3,012	***	50	4,650	26	***
March	4,025	***	40	2,565	332	***
April	4,991	***	0	2,127	5,784	***
May	7,614	***	40	3,041	217	***
June	1,062	***	82	949	166	***
July	1,404	***	0	4,152	462	***
August	4,691	***	0	4,040	0	***
September	5,028	***	0	2,991	12,259	***
October	6,283	***	2,037	5,198	527	***
November	6,059	***	0	2,087	211	***
December	2,126	***	2,683	2,046	93	***
2014--						
January	3,350	***	2,726	1,959	98	***
February	200	***	10,826	3,990	12,109	***
March	915	***	6,952	2,797	13,635	***
April	3,391	***	3,556	6,187	3,590	***
May	2,896	***	6,679	4,805	7,824	***
June	3,347	***	1,817	2,652	10,993	***
July	6,413	***	290	6,279	6,074	***
August	6,135	***	223	4,851	9,514	***
September	11,957	***	1,717	4,369	23,375	***
October	14,608	***	2,994	9,176	19,451	***
November	10,869	***	0	6,657	812	***
December	13,251	***	472	4,749	9,020	***

Table continued on next page.

Table E-1—Continued
CTL plate: U.S. imports, by month, January 2013 through September 2016

Month	U.S. imports from					
	Japan	Korea subject	South Africa	Taiwan	Turkey	Subject sources
	Quantity (short tons)					
2015--						
January	10,993	***	0	4,741	365	***
February	9,299	***	0	5,039	11,988	***
March	10,743	***	2,213	8,312	1,272	***
April	6,103	***	1,637	4,213	885	***
May	4,796	***	2,919	2,669	39	***
June	5,045	***	2,300	1,319	27	***
July	11,031	***	0	1,668	162	***
August	6,033	***	4,924	700	325	***
September	8,611	***	1,409	1,949	7	***
October	1,644	***	2,318	1,248	22	***
November	1,313	***	978	2,022	2,702	***
December	2,911	***	2,797	1,602	5,488	***
2016--						
January	2,413	***	93	1,525	490	***
February	754	***	0	346	5,705	***
March	11,422	***	0	771	0	***
April	2,878	***	0	1,947	11,546	***
May	5,797	***	0	602	3,893	***
June	1,606	***	0	918	2,743	***
July	4,704	***	0	1,354	472	***
August	1,433	***	0	1,196	10,698	***
September	2,011	***	0	1,941	28	***

Table continued on next page.

Table E-1—Continued
CTL plate: U.S. imports, by month, January 2013 through September 2016

Month	U.S. imports from					
	Canada	Korea nonsubject	Mexico	All other sources	Nonsubject sources	All import sources
	Quantity (short tons)					
2013--						
January	16,977	***	1,219	4,834	***	50,039
February	14,962	***	3,899	9,282	***	95,413
March	16,018	***	5,857	8,683	***	68,000
April	20,097	***	3,888	10,500	***	126,678
May	16,770	***	3,757	4,927	***	68,787
June	13,921	***	5,898	9,351	***	72,280
July	13,950	***	7,107	8,214	***	59,155
August	12,230	***	7,054	4,165	***	53,561
September	13,445	***	3,081	3,251	***	88,618
October	14,901	***	3,229	7,286	***	81,087
November	12,657	***	4,195	13,990	***	74,773
December	12,645	***	6,781	12,572	***	67,830
2014--						
January	12,246	***	9,588	4,477	***	66,662
February	11,161	***	6,959	13,777	***	102,521
March	12,301	***	8,453	20,759	***	124,797
April	14,133	***	5,994	25,732	***	132,150
May	18,092	***	8,356	35,767	***	129,798
June	17,206	***	8,610	41,528	***	170,365
July	17,754	***	9,000	23,377	***	150,760
August	19,676	***	6,576	34,095	***	143,819
September	18,965	***	6,548	46,373	***	182,563
October	17,397	***	6,222	29,284	***	201,482
November	15,577	***	4,904	41,211	***	193,707
December	12,570	***	2,651	37,908	***	182,924

Table continued on next page.

Table E-1—Continued
CTL plate: U.S. imports, by month, January 2013 through September 2016

Month	U.S. imports from					
	Canada	Korea nonsubject	Mexico	All other sources	Nonsubject sources	All import sources
	Quantity (short tons)					
2015--						
January	13,667	***	3,403	27,488	***	216,380
February	11,331	***	841	14,507	***	183,755
March	15,102	***	960	12,824	***	144,334
April	16,130	***	572	6,370	***	110,724
May	13,425	***	2,228	7,099	***	122,526
June	16,409	***	3,556	3,282	***	116,522
July	13,518	***	8,061	9,963	***	121,049
August	14,077	***	9,472	4,777	***	82,815
September	16,410	***	7,014	3,627	***	136,615
October	11,838	***	5,089	10,341	***	55,464
November	13,314	***	4,609	2,452	***	63,015
December	13,331	***	3,713	7,886	***	135,142
2016--						
January	17,619	***	4,661	3,167	***	96,681
February	17,613	***	7,689	3,372	***	102,685
March	17,224	***	8,010	3,450	***	122,916
April	18,007	***	3,835	3,030	***	118,694
May	15,023	***	2,843	4,857	***	114,014
June	12,781	***	2,973	4,673	***	100,089
July	10,046	***	2,923	6,218	***	126,250
August	9,623	***	5,215	10,097	***	107,233
September	9,114	***	2,533	10,378	***	94,892

Source: Official U.S. import statistics and proprietary Customs records using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.1190, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed November 8, 2016.

APPENDIX F

NONSUBJECT COUNTRY PRICE DATA

Five importers reported price data for Canada for products 1-4 and eight reported price data for Mexico. [1] [2] Price data reported by these firms for 2015 accounted for *** percent of U.S. imports from Canada and *** percent from Mexico. These price items and accompanying data are comparable to those presented in tables V-3 to V-6. Price and quantity data for Canada and Mexico are shown in tables F-1 to F-4 and in figures F-1 to F-4 (with domestic and subject sources).

In comparing nonsubject country pricing data with U.S. producer pricing data, prices for product imported from Canada were lower than prices for U.S.-produced product in 26 instances and higher in 34 instances. Prices for product imported from Mexico were lower than prices for U.S.-produced product in 59 instances and higher in 1 instance.

As with comparisons with U.S. producer pricing, when comparing nonsubject country pricing data with subject country pricing data, prices for product imported from Canada were often situated among the prices from domestic and subject sources, while prices from Mexico were usually among the lowest of all prices. The prices for product imported from Canada were lower than prices for product imported from subject countries in 113 instances and higher in 171 instances. Prices for product imported from Mexico were lower than prices for product imported from subject countries in 258 instances and higher in 26 instances. A summary of price differentials is presented in table F-5.

[1] Firms providing data for Canada include ***, and firms providing data for Mexico include ***

[2] No price data were received for imports from Canada or Mexico for products 5 or 6. Consequently, no comparisons can be made between prices for products from Canada and Mexico to those from Austria, France, or Germany.

Table F-1
CTL plate: Weighted-average f.o.b. prices and quantities of domestic and nonsubject imported product 1,[1] by quarters, January 2013-September 2016

Period	United States		Canada		Mexico	
	Price *(dollars per short ton)*	Quantity *(short tons)*	Price *(dollars per short ton)*	Quantity *(short tons)*	Price *(dollars per short ton)*	Quantity *(short tons)*
2013:						
Jan.-Mar.	740	125,788	746	3,292	***	***
Apr.-June	741	127,550	736	3,970	***	***
July-Sept.	724	114,290	731	4,249	***	***
Oct.-Dec.	744	119,572	749	2,839	***	***
2014:						
Jan.-Mar.	779	124,953	739	3,427	***	***
Apr.-June	785	126,922	775	3,766	***	***
July-Sept.	809	120,887	800	3,484	***	***
Oct.-Dec.	805	112,456	***	***	***	***
2015:						
Jan.-Mar.	729	119,634	680	3,692	***	***
Apr.-June	638	112,406	***	***	***	***
July-Sept.	627	102,774	***	***	***	***
Oct.-Dec.	595	90,057	***	***	***	***
2016:						
Jan.-Mar.	523	116,872	499	3,383	***	***
Apr.-June	569	111,685	***	***	***	***
July-Sept.	653	79,889	***	***	***	***

[1] Product 1: Hot-rolled CTL carbon steel plate, ASTM A-36 or equivalent as rolled, mill edge, not heat treated, not cleaned or oiled, in cut lengths, 72” through 96” in width, 0.250” thick.

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

Table F-2
CTL plate: Weighted-average f.o.b. prices and quantities of domestic and nonsubject imported product 2,[1] by quarters, January 2013-September 2016

Period	United States		Canada		Mexico	
	Price *(dollars per short ton)*	Quantity *(short tons)*	Price *(dollars per short ton)*	Quantity *(short tons)*	Price *(dollars per short ton)*	Quantity *(short tons)*
2013:						
Jan.-Mar.	712	21,518	***	***	***	***
Apr.-June	715	23,312	***	***	***	***
July-Sept.	697	26,433	***	***	***	***
Oct.-Dec.	712	20,497	***	***	***	***
2014:						
Jan.-Mar.	761	18,891	***	***	***	***
Apr.-June	774	19,680	***	***	***	***
July-Sept.	794	21,862	***	***	***	***
Oct.-Dec.	797	19,946	***	***	***	***
2015:						
Jan.-Mar.	727	19,799	***	***	***	***
Apr.-June	622	22,271	***	***	***	***
July-Sept.	588	16,658	***	***	***	***
Oct.-Dec.	530	17,873	***	***	***	***
2016:						
Jan.-Mar.	468	22,276	***	***	***	***
Apr.-June	553	19,888	***	***	***	***
July-Sept.	589	11,881	***	***	***	***

[1] Product 2: Hot-rolled CTL carbon steel plate, ASTM A-36 or equivalent as rolled, mill edge, not heat treated, not cleaned or oiled, in cut lengths, 72” through 96” in width, 0.3125” thick.

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

Table F-3
CTL plate: Weighted-average f.o.b. prices and quantities of domestic and nonsubject imported product 3,[1] by quarters, January 2013-September 2016

Period	United States		Canada		Mexico	
	Price *(dollars per short ton)*	Quantity *(short tons)*	Price *(dollars per short ton)*	Quantity *(short tons)*	Price *(dollars per short ton)*	Quantity *(short tons)*
2013:						
Jan.-Mar.	678	374,658	***	***	***	***
Apr.-June	695	389,903	***	***	***	***
July-Sept.	676	381,901	***	***	***	***
Oct.-Dec.	676	386,378	***	***	***	***
2014:						
Jan.-Mar.	736	358,043	***	***	***	***
Apr.-June	765	363,497	***	***	***	***
July-Sept.	790	383,120	***	***	***	***
Oct.-Dec.	787	322,874	***	***	***	***
2015:						
Jan.-Mar.	706	271,504	***	***	***	***
Apr.-June	597	296,512	***	***	***	***
July-Sept.	548	278,254	***	***	***	***
Oct.-Dec.	477	267,519	***	***	***	***
2016:						
Jan.-Mar.	450	329,570	***	***	***	***
Apr.-June	520	371,578	***	***	***	***
July-Sept.	552	235,559	***	***	***	***

[1] Product 3: Hot-rolled CTL carbon steel plate, ASTM A-36 or equivalent as rolled, mill edge, not heat treated, not cleaned or oiled, in cut lengths, 72” through 120” in width, 0.375” through 3.00” in thickness.

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

Table F-4
CTL plate: Weighted-average f.o.b. prices and quantities of domestic and nonsubject imported product 4,[1] by quarters, January 2013-September 2016

Period	United States		Canada		Mexico	
	Price *(dollars per short ton)*	Quantity *(short tons)*	Price *(dollars per short ton)*	Quantity *(short tons)*	Price *(dollars per short ton)*	Quantity *(short tons)*
2013:						
Jan.-Mar.	738	130,050	***	***	***	***
Apr.-June	746	144,833	***	***	***	***
July-Sept.	726	139,685	***	***	***	***
Oct.-Dec.	739	156,324	***	***	***	***
2014:						
Jan.-Mar.	787	161,230	***	***	***	***
Apr.-June	804	182,069	***	***	***	***
July-Sept.	828	173,602	***	***	***	***
Oct.-Dec.	828	161,596	***	***	***	***
2015:						
Jan.-Mar.	772	136,626	***	***	***	***
Apr.-June	677	137,476	***	***	***	***
July-Sept.	646	140,392	***	***	***	***
Oct.-Dec.	581	112,932	***	***	***	***
2016:						
Jan.-Mar.	552	152,228	***	***	***	***
Apr.-June	597	163,077	***	***	***	***
July-Sept.	651	133,805	***	***	***	***

[1] Product 4: Hot-rolled CTL carbon steel plate, high strength low alloy (HSLA), ASTM A-572, Grade 50, mill edge, not cleaned or oiled, in cut lengths, 72" through 120" in width, 0.5" through 1.5" in thickness.

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

Figure F-1
CTL plate: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by quarters, January 2013-September 2016

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Figure F-2
CTL plate: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by quarters, January 2013-September 2016

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Figure F-3
CTL plate: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by quarters, January 2013-September 2016

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Figure F-4
CTL plate: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, by quarters, January 2013-September 2016

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Table F-5
CTL plate: Summary of price differentials, by country, January 2013-September 2016

Comparison	Total number of comparisons	Nonsubject higher than the comparison source	Nonsubject lower than the comparison source
Nonsubject vs United States.--			
Canada vs. United States	60	34	26
Mexico vs. United States	60	1	59
Nonsubject vs Subject.--			
Canada vs. Belgium	15	7	8
Canada vs. Brazil	47	28	19
Canada vs. China	2	1	1
Canada vs. Italy	26	17	9
Canada vs. Japan	26	14	12
Canada vs. Korea (POSCO)	56	34	22
Canada vs. South Africa	27	22	5
Canada vs. Taiwan	55	26	29
Canada vs. Turkey	30	22	8
Total Canada vs. Subject	284	171	113
Mexico vs. Belgium	15	1	14
Mexico vs. Brazil	47	5	42
Mexico vs. China	2	1	1
Mexico vs. Italy	26	0	26
Mexico vs. Japan	26	1	25
Mexico vs. Korea (POSCO)	56	7	49
Mexico vs. South Africa	27	7	20
Mexico vs. Taiwan	55	1	54
Mexico vs. Turkey	30	3	27
Total Mexico vs. Subject	284	26	258

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

APPENDIX G

TOOL/HIGH SPEED STEEL NEGLIGIBILITY DATA AND CRITICAL CIRCUMSTANCES DATA

Table G-1
CTL plate: U.S. imports in the twelve month period preceding the filing of the petition, by source, April 2015 through March 2016

Source	Scenario 2 from Table IV-4: All CTL plate		Of which, tool and high speed steel CTL plate		Of which, other than tool or high speed steel CTL plate	
	Quantity (short tons)	Share of quantity (percent)	Quantity (short tons)	Share of quantity (percent)	Quantity (short tons)	Share of quantity (percent)
U.S. imports from.--						
Austria	13,110	1.1	3,306	26.9	9,804	0.8
Belgium	14,272	1.1	180	1.5	14,091	1.1
Brazil	31,478	2.5	***	***	***	***
China	87,395	7.0	3,952	32.2	83,444	6.8
France	167,466	13.4	2,404	19.6	165,062	13.4
Germany	204,683	16.4	1,274	10.4	203,409	16.5
Italy	38,021	3.1	153	1.2	37,869	3.1
Japan	61,041	4.9	264	2.2	60,777	4.9
Korea subject	***	***	***	***	***	***
South Africa	19,375	1.6	0	0.0	19,375	1.6
Taiwan	20,032	1.6	0	0.0	20,032	1.6
Turkey	15,851	1.3	0	0.0	15,851	1.3
All subject imports	***	***	***	***	***	***
Of which individually negligible	114,117	9.2	598	4.9	110,630	9.0
Canada	179,224	14.4	79	0.6	179,146	14.5
Korea nonsubject	***	***	***	***	***	***
Mexico	64,674	5.2	0	0.0	64,674	5.2
All other sources	65,788	5.3	669	5.4	65,118	5.3
Nonsubject sources	***	***	***	***	***	***
Total U.S. imports	1,245,236	100.0	12,282	100.0	1,232,954	100.0

Source: Official U.S. import statistics and proprietary Customs records using HTS statistical reporting numbers 7208.40.3030, 7208.40.3060, 7208.51.0030, 7208.51.0045, 7208.51.0060, 7208.52.0000, 7211.13.0000, 7211.14.0030, 7211.14.0045, 7225.40.1110, 7225.40.1180, 7225.40.1190, 7225.40.3005, 7225.40.3050, 7226.20.0000, and 7226.91.5000, accessed December 7, 2016, with adjustments based on data submitted in response to Commission questionnaires. Tool and high speed steel based on 7225.40.1110, 7225.40.1180, 7225.40.1190, and 7226.20.0000, however, staff has excluded from the compilation for tool and high speed steel entries from Brazil as being unlikely tool and high speed steel.

Table G-2
CTL plate: U.S. imports before and after petition filing date, April 2015 through March 2016

Source	Five month comparison			Six month comparison		
	Before (short tons)	After (short tons)	Percent change (percent)	Before (short tons)	After (short tons)	Percent change (percent)
U.S. imports from.--						
Austria	1,362	1,145	(16.0)	1,447	1,269	(12.3)
Belgium	0	0	0.0	0	3	0.0
Brazil	0	0	0.0	0	0	0.0
China	954	965	1.1	1,191	1,615	35.6
France	473	721	52.3	619	968	56.4
Germany	419	246	(41.3)	619	968	56.4
Italy	151	246	62.9	443	279	(37.1)
Japan	42	178	319.7	56	194	250.0
Korea subject	0	0	0.0	0	0	0.0
South Africa	0	0	0.0	0	0	0.0
Taiwan	0	0	0.0	0	0	0.0
Turkey	0	0	0.0	0	0	0.0

Source: Official U.S. import statistics using HTS statistical reporting numbers 7225.40.1110, 7225.40.1180, 7225.40.1190, and 7226.20.0000.

APPENDIX H

FOREIGN PRODUCERS' TOOL/HIGH SPEED STEEL DATA

Table H-1
CTL plate: Data on tool/high speed steel industries in subject countries, 2013-15, January to September 2015, and January to September 2016 and projection calendar years 2015 and 2016

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Table H-2
CTL plate: Data on tool/high speed steel industries in Austria, 2013-15, January to September 2015, and January to September 2016 and projection calendar years 2015 and 2016

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Table H-3
CTL plate: Data on tool/high speed steel industries in Brazil, 2013-15, January to September 2015, and January to September 2016 and projection calendar years 2015 and 2016

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Table H-4
CTL plate: Data on tool/high speed steel industries in Germany, 2013-15, January to September 2015, and January to September 2016 and projection calendar years 2015 and 2016

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Table H-5
CTL plate: Data on tool/high speed steel industries in Japan, 2013-15, January to September 2015, and January to September 2016 and projection calendar years 2015 and 2016

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Table H-6
CTL plate: Data all CTL plate less tool/high speed steel in subject countries, 2013-15, January to September 2015, and January to September 2016 and projection calendar years 2015 and 2016

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