Carbon and Alloy Steel Threaded Rod from Thailand

Investigation No. 731-TA-1444 (Final)

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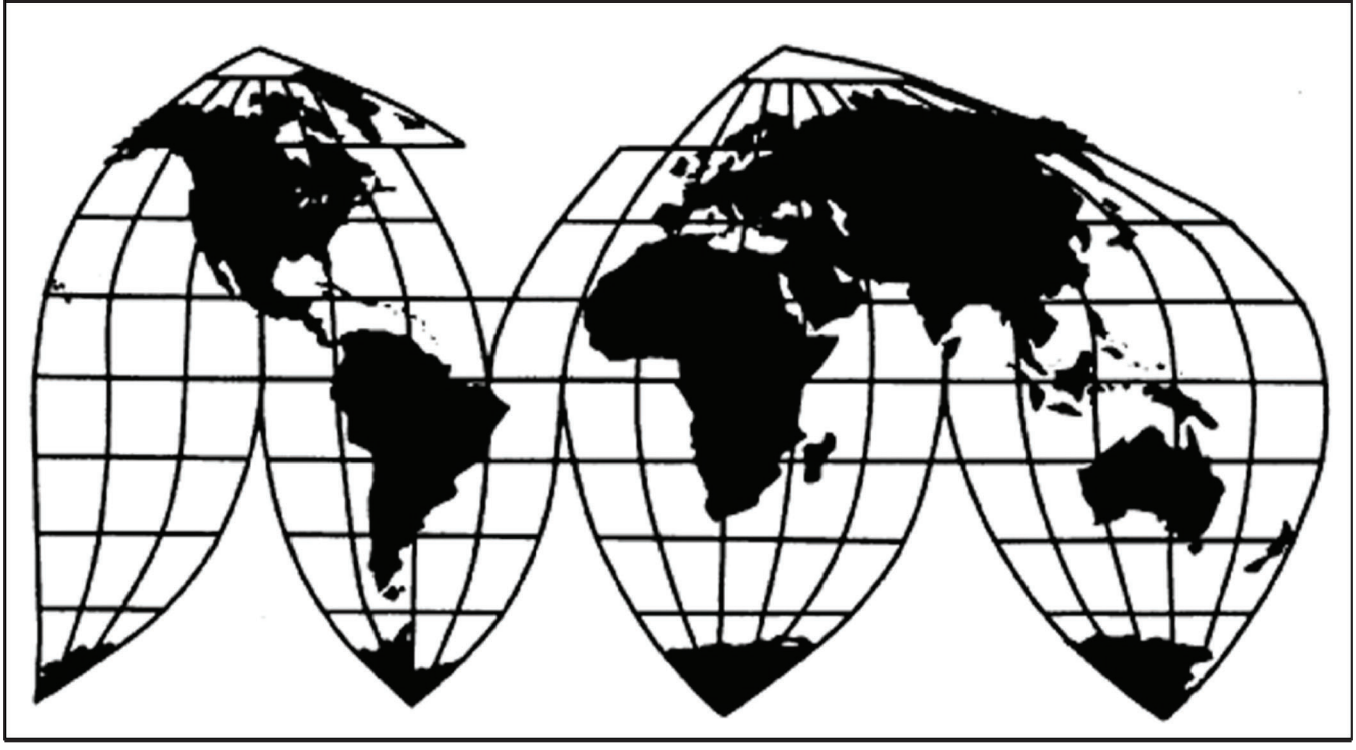

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U.S. International Trade Commission

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UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation No. 731-TA-1444 (Final)

Carbon and Alloy Steel Threaded Rod from Thailand

DETERMINATION

On the basis of the record[1] developed in the subject investigation, the United States International Trade Commission ("Commission") determines, pursuant to the Tariff Act of 1930 ("the Act"), that an industry in the United States is materially injured by reason of imports of carbon and alloy steel threaded rod ("threaded rod") from Thailand, provided for in subheadings 7318.15.50, 7318.15.20, and 7318.19.00 of the Harmonized Tariff Schedule of the United States, that have been found by the U.S. Department of Commerce ("Commerce") to be sold in the United States at less than fair value ("LTFV").[2] [3]

BACKGROUND

The Commission, pursuant to section 735(b) of the Act (19 U.S.C. 1673d(b)), instituted this investigation effective February 21, 2019, following receipt of a petition filed with the Commission and Commerce by Vulcan Threaded Products Inc. ("Vulcan"), Pelham, Alabama. The Commission scheduled the final phase of the investigation following notification of a preliminary determination by Commerce that imports of threaded rod from Thailand[4] were being sold at LTFV within the meaning of section 733(b) of the Act (19 U.S.C. 1673b(b)). Notice of the scheduling of the final phase of the Commission's investigation and of a public hearing to

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

[2] 84 FR 56162 (October 21, 2019) (final determination).

[3] The Commission also finds that imports subject to Commerce's affirmative critical circumstances determination are not likely to undermine seriously the remedial effect of the antidumping duty order on Thailand.

[4] 84 FR 38597 (August 7, 2019) (preliminary determination).

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 August 27, 2019 (84 FR 44916). The hearing was held in Washington, DC, on October 15, 2019, and all persons who requested the opportunity were permitted to appear in person or by counsel.

Views of the Commission

Based on the record of the final phase of this investigation, we determine that an industry in the United States is materially injured by reason of imports of alloy and carbon steel threaded rod ("threaded rod") from Thailand found by the U. S. Department of Commerce ("Commerce") to be sold in the United States at less than fair value ("LTFV"). We also find that critical circumstances do not exist with respect to imports of threaded rod from Thailand that are subject to Commerce's affirmative critical circumstances determination.

I. Background

Vulcan Threaded Products, Inc. ("Vulcan"), a U.S. producer of threaded rod, filed countervailing duty and/or antidumping duty petitions on threaded rod from China,[1] India, Taiwan, and Thailand on February 21, 2019. Vulcan's representatives appeared at the hearing accompanied by counsel and submitted prehearing and posthearing briefs and final comments. Representatives of Bay Standard Manufacturing, Inc. ("Bay Standard") and the Dan-Loc Group ("Dan-Loc"), domestic producers of threaded rod, also appeared at the hearing in support of the petition. No respondent parties appeared at the hearing or filed briefs.

Commerce postponed the issuance of its preliminary determinations in its antidumping duty investigations concerning threaded rod from China, India, and Taiwan,[2] as well as its final determinations in the antidumping and countervailing duty investigations of threaded rod from

[1] The petition specifically excluded from the scope of the antidumping investigation on steel threaded rod from China any carbon threaded rod covered by the existing antidumping duty order on that product. *See Certain Steel Threaded Rod from the People's Republic of China: Notice of Antidumping Duty Order,* 74 Fed. Reg. 17154 (April 14, 2009).

[2] *See Alloy and Certain Carbon Steel Threaded Rod From India, Taiwan, and the People's Republic of China: Postponement of Preliminary Determination in the Less-Than-Fair Value Investigations*, 84 Fed. Reg. 27764 (June 14, 2019).

China and India.[3] Commerce did not postpone its final determinations concerning the antidumping duty investigations concerning threaded rod from Taiwan[4] and Thailand.[5] Consequently, the investigation schedules for these investigations became staggered. This has necessitated an earlier final determination in the final antidumping duty investigation regarding threaded rod from Thailand than in the other threaded rod investigations initiated simultaneously, and our determination here concerns only that investigation.[6]

U.S. industry data are based on the questionnaire responses of nine producers believed to account for the vast majority of U.S. production of threaded rod.[7] U.S. import data are based on responses to the Commission's importer questionnaires and official Commerce statistics.[8] The Commission received usable responses to its foreign producer questionnaires from four producers/exporters in India, accounting for approximately 41.8 percent of U.S. imports of

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[3] S*ee Alloy and Certain Carbon Steel Threaded Rod From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination*, 84 Fed. Reg. 36578 (July 29, 2019); *Carbon and Alloy Steel Threaded Rod From India: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Countervailing Duty Determination*, 84 Fed. Reg. 36570 (July 29, 2019); *Alloy and Certain Carbon Steel Threaded Rod From the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures*, 84 Fed. Reg. 50379 (September 25, 2019) ("Preliminary Commerce AD Determination (China)"); *Carbon and Alloy Steel Threaded Rod From India: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures*, 84 Fed. Reg. 50376 (September 25, 2019) ("Preliminary Commerce AD Determination (India)").

[4] *See Carbon and Alloy Steel Threaded Rod From Taiwan: Preliminary Affirmative Determination of Sales at Less Than Fair Value*, 84 Fed. Reg. 50382 (September 25, 2019) ("Preliminary Commerce AD Determination (Taiwan)").

[5] *See Carbon and Alloy Steel Threaded Rod From Thailand: Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances*, 84 Fed. Reg. 56162 (October 29, 2019) ("Final Commerce Determination (Thailand)").

[6] *See* 19 U.S.C. § 1677(7)(G)(iii).

[7] Confidential Report ("CR") and Public Report ("PR") at III-1.

[8] CR/PR at IV-1, Table IV-2. The Commission received questionnaire responses from 57 importers, representing *** percent of imports of threaded rod from China, *** percent from India, *** percent from Taiwan, and *** percent from Thailand in 2018. CR/PR at IV-1.

subject merchandise from India in 2018;[9] and one producer/exporter in Taiwan, accounting for approximately *** percent of production and *** percent of U.S. imports of subject merchandise from Taiwan in 2018.[10] The Commission did not receive any questionnaire responses from foreign producers or exporters in China or Thailand.[11]

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."[12] 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."[13] 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."[14]

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

[9] CR/PR at VII-7.
[10] CR/PR at VII-15.
[11] CR/PR at VII-3 (China) and VII-19 (Thailand).
[12] 19 U.S.C. § 1677(4)(A).
[13] 19 U.S.C. § 1677(4)(A).
[14] 19 U.S.C. § 1677(10).

"most similar in characteristics and uses" on a case-by-case basis.[15] No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.[16] The Commission looks for clear dividing lines among possible like products and disregards minor variations.[17] Although the Commission must accept Commerce's determination as to the scope of the imported merchandise that is subsidized or sold at less than fair value,[18] the Commission determines what domestic product is like the imported articles Commerce has identified.[19]

B. Product Description

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

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[15] *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).

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

[17] *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.").

[18] *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).

[19] *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).

. . . carbon and alloy steel threaded rod. Steel threaded rod is certain threaded rod, bar, or studs, of carbon or alloy steel, having a solid, circular cross section of any diameter, in any straight length. Steel threaded rod is normally drawn, cold-rolled, threaded, and straightened, or it may be hot-rolled. In addition, the steel threaded rod, bar, or studs subject to these investigations are non-headed and threaded along greater than 25 percent of their total actual length. A variety of finishes or coatings, such as plain oil finish as a temporary rust protectant, zinc coating (*i.e.,* galvanized, whether by electroplating or hot-dipping), paint, and other similar finishes and coatings, may be applied to the merchandise.

Steel threaded rod is normally produced to American Society for Testing and Materials (ASTM) specifications ASTM A36, ASTM A193 B7/B7m, ASTM A193 B16, ASTM A307, ASTM A329 L7/L7M, ASTM A320 L43, ASTM A354 BC and BD, ASTM A449, ASTM F1554–36, ASTM F1554–55, ASTM F1554 Grade 105, American Society of Mechanical Engineers (ASME) specification ASME B18.31.3, and American Petroleum Institute (API) specification API 20E. All steel threaded rod meeting the physical description set forth above is covered by the scope of these investigations, whether or not produced according to a particular standard.

Subject merchandise includes material matching the above description that has been finished, assembled, or packaged in a third country, including by cutting, chamfering, coating, or painting the threaded rod, by attaching the threaded rod to, or packaging it with, another product, or any other finishing, assembly, or packaging operation that would not otherwise remove the merchandise from the scope of the investigations if performed in the country of manufacture of the threaded rod.

Carbon and alloy steel threaded rod are also included in the scope of these investigations whether or not imported attached to, or in conjunction with, other parts and accessories such as nuts and washers. If carbon and alloy steel threaded rod are imported attached to, or in conjunction with, such non-subject merchandise, only the threaded rod is included in the scope.

Excluded from the scope of these investigations are: (1) Threaded rod, bar, or studs which are threaded only on one or both ends and the threading covers 25 percent or less of the total actual length; and (2) stainless steel threaded rod, defined as steel threaded rod containing, by weight, 1.2 percent or less of carbon and 10.5 percent or more of chromium, with our without other elements.

Excluded from the scope of the antidumping investigation on steel threaded rod from the People's Republic of China is any merchandise covered by the existing antidumping order on Certain Steel Threaded Rod from the People's Republic of China. *See Certain Steel Threaded Rod from the People's Republic of China: Notice of Antidumping Duty Order,* 74 FR 17154 (April 14, 2009).

> Specifically excluded from the scope of this investigation is threaded rod that is imported as part of a package of hardware in conjunction with a ready-to-assemble piece of furniture.
>
> Steel threaded rod is currently classifiable under subheadings 7318.15.5051, 7318.15.5056, and 7318.15.5090 of the Harmonized Tariff Schedule of the United States (HTSUS). Subject merchandise may also enter under subheading 7318.15.2095 and 7318.19.0000 of the HTSUS. The HTSUS subheadings are provided for convenience and U.S. Customs purposes only. The written description of the scope is dispositive.[20]

Threaded rod is produced from carbon and alloy steel wire rod (in the form of coils), or from steel bar for applications that require a larger diameter.[21] Threaded rod can also be heat-treated either before or after it is threaded. Depending on the intended end use of the final product, threaded rod can also be coated with a plain oil finish during the threading process, galvanized using either a zinc plating or a hot-dip galvanizing process, or coated with other finishes such as paint or epoxy coatings; these processes all impart corrosion resistance.[22] Threaded rod is normally produced to be compliant with particular specifications published by the American Society for Testing and Materials ("ASTM"), the Society of Mechanical Engineers ("ASME"), and American Petroleum Institute ("API").[23]

C. Domestic Like Product Analysis

In the preliminary determinations, the Commission found a single domestic like product, coextensive with Commerce's scope of investigation.[24] It found that both carbon and alloy threaded rod have the same physical appearance and generally the same uses, and largely

[20] Final Commerce Determination (Thailand), 84 Fed. Reg. at 56163-64.
[21] CR/PR at I-17.
[22] CR/PR at I-18.
[23] CR/PR at I-16 to I-17 and nn.42-50.
[24] *Carbon and Alloy Steel Threaded Rod from China, India, Thailand, and Taiwan*, Inv. Nos. 701-TA-618-619 and 731-TA-1441-1444 (Preliminary), USITC Pub. 4885 (April 2019) ("Preliminary Determinations") at 9.

share the same manufacturing facilities, production processes, and employees. It also found that domestically produced threaded rod generally is sold through a single channel of distribution (to distributors) and that steel and alloy threaded rod are interchangeable in many applications. The Commission observed that producers and customers perceive carbon and alloy threaded rod to be part of a single product category. It also observed that threaded rod is available in a range of prices depending on size and other factors.[25]

The record in the final phase of these investigations concerning the characteristics of threaded rod is the same as that in the preliminary phase of these investigations.[26] Therefore, based on the record and the lack of any contrary argument,[27] we define a single domestic like product consisting of threaded rod, coextensive with Commerce's scope of investigation, for the same reasons specified in the preliminary determinations.

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 product."[28] 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.

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[25] Preliminary Determinations, USITC Pub. 4885 at 7-8.

[26] *See* CR/PR at I-16 to I-19.

[26] CR/PR at I-16 to I-19.

[27] Vulcan requested that the Commission find a single domestic like product coextensive with the scope as it did in the preliminary determinations. Petitioner Prehearing Brief at 2; Posthearing Brief 1-2 and Responses to Questions 1 and 3.

[28] 19 U.S.C. § 1677(4)(A).

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 the subject merchandise or which are themselves importers.[29] Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.[30]

For the purposes of these determinations, eight domestic producers of threaded rod either imported subject merchandise directly or had a parent-subsidiary relationship with an importer of subject merchandise during the January 2016 – June 2019 period of investigation ("POI").[31] Vulcan argues that the Commission should exclude domestic producers *** from the definition of the domestic industry because the principal interests of these firms appear to lie in

[29] *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 1089), *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).

[30] 19 U.S.C. § 1677(4)(B). The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

(1) the percentage of domestic production attributable to the importing producer;

(2) the reason the U.S. producer has decided to import the product subject to investigation (whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market);

(3) whether inclusion or exclusion of the related party will skew the data for the rest of the industry;

(4) the ratio of import shipments to U.S. production for the imported product; and

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

[31] CR/PR at Table III-9. In the preliminary determinations, the Commission found that six domestic producers were related parties because each of these producers either imported subject merchandise directly or had a parent-subsidiary relationship with an importer of subject merchandise. It found however, that appropriate circumstances did not exist to exclude any of these firms for the purposes of its analysis in those determinations. Preliminary Determinations, USITC Pub. 4885 at 10-12.

importing rather than domestic production.[32] Moreover, it argues that the Commission should not exclude *** from the domestic industry because that firm's principal interest is in domestic production rather than importation.[33]

We consider whether appropriate circumstances exist to exclude any of the related party producers from the domestic industry.

***. *** is a related party because its *** imported subject merchandise from China.[34] *** accounted for *** percent of U.S. production in 2018.[35] The ratio of *** affiliate's subject imports from China to *** domestic production was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in January-June (interim) 2018, and *** percent in interim 2019.[36] *** stated that its affiliate ***.[37] *** the petition.[38] Its operating income ratio was *** than the average for all domestic producers throughout the POI.[39] On balance, given that the record indicates that the firm's primary interest appears to be in domestic production, we find that appropriate circumstances do not exist to exclude *** from the domestic industry as a related party.

***. *** accounted for *** percent of U.S. production in 2018.[40] *** ratio of its subject imports to domestic production was *** percent in 2016, *** percent in 2017, *** percent in

[32] Petitioner Posthearing Brief at 2 and Response to Question 5.
[33] Petitioner Posthearing Brief at 2 and Response to Question 5.
[34] CR/PR at Tables III-2, III-9, and IV-1. Petitioner Vulcan reported that it purchased all of the major equipment and assets of ***, facility in August 2017. CR/PR at III-3. *** retains ownership of two other production facilities. *See* CR/PR at Table III-2.
[35] CR/PR at Table III-1.
[36] CR/PR at Table III-9.
[37] CR/PR at Table III-9.
[38] CR/PR at Table III-1.
[39] CR/PR at Table VI-3.
[40] CR/PR at Table III-1.

2018, *** percent in interim 2018, and *** percent in interim 2019.[41] *** stated that it imported subject merchandise because ***.[42] *** the petition.[43] Its operating income ratio was *** than any other domestic producer for the period for which it submitted data.[44] On balance, given that the record indicates that the firm's primary interest appears to be in domestic production, we find that appropriate circumstances do not exist to exclude *** from the domestic industry as a related party.

***. *** is a small U.S. producer, accounting for *** percent of U.S. production in 2018.[45] *** imports of subject merchandise exceeded *** domestic production during most of the POI. The ratio of the parent company's subject imports from *** to *** domestic production was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in interim 2018, and *** percent in interim 2019.[46] *** the petition and did not specify its parent company's reason for importing subject merchandise.[47] Its operating income ratio was *** than the average for all domestic producers throughout the POI.[48] Given *** high ratio of subject imports to domestic production, the record indicates its primary interest is not in domestic production. Therefore, we find that appropriate circumstances exist to exclude *** from the domestic industry as a related party.[49]

[41] CR/PR at Table III-9.
[42] CR/PR at Table III-9.
[43] CR/PR at Table III-1.
[44] CR/PR at Table VI-3. *** did not report financial data for either interim period. CR/PR at Table VI-3 n.1.
[45] CR/PR at Table III-1.
[46] CR/PR at Table III-9.
[47] CR/PR at Tables III-1 and III-9.
[48] CR/PR at Table VI-3.
[49] Chairman Johanson would not exclude *** as a related party on this record. Given the ratios of the parent firm's imports to *** domestic production during the POI, the fact that *** total domestic

***. *** accounted for *** percent of U.S. production in 2018.[50] Its ratio of subject imports to domestic production was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in interim 2018, and *** percent in interim 2019.[51] *** stated that it ***.[52] *** the petition.[53] It did not submit usable financial data.[54] Given its high ratio of subject imports to domestic production, *** primary interest appears to be in importation rather than domestic production. Therefore, we find that appropriate circumstances exist to exclude *** from the domestic industry as a related party.

***. *** accounted for *** percent of U.S. production in 2018.[55] Its ratio of subject imports to domestic production was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in interim 2018, and *** percent in interim 2019.[56] *** stated that it ***.[57] *** the petition.[58] Its operating income ratio was *** than the average for all domestic producers in 2017, 2018, and interim 2018, and *** than the average in 2016 and interim 2019.[59] Given its high ratio of subject imports to domestic production, its primary interest does not appear to be in domestic production. Therefore, we find that appropriate circumstances exist to exclude *** from the domestic industry as a related party.

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production exceeded its parent firm's imports over the POI and in the most recent part of the POI (CR/PR at Table III-9), and the lack of indication on this record that *** benefitted from its parent firm's importation activities, Chairman Johanson does not find that appropriate circumstances exist to exclude *** from the domestic industry as a related party.

[50] CR/PR at Table III-1.
[51] CR/PR at Table III-9.
[52] CR/PR at Table III-9.
[53] CR/PR at Table III-1.
[54] CR/PR at VI-1 n.1.
[55] CR/PR at Table III-1.
[56] CR/PR at Table III-9.
[57] CR/PR at Table III-9.
[58] CR/PR at Table III-1.
[59] CR/PR at Table VI-3.

***. *** accounted for *** percent of U.S. production in 2018.[60] Its ratio of subject imports to domestic production was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in interim 2018, and *** percent in interim 2019.[61] *** stated that it ***.[62] This firm *** the petition and testified at the hearing in support of imposition of duties.[63] Its operating income ratio was either the *** among reporting domestic producers for each year or interim period of the POI.[64] Moreover, it *** during the POI.[65] Given that the record indicates that *** primary interest appears to be in domestic production, we find that appropriate circumstances do not exist to exclude *** from the domestic industry as a related party.

***. *** accounted for *** percent of U.S. production in 2018.[66] *** ratio of its subject imports to domestic production was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in interim 2018, and *** percent in interim 2019.[67] While its ratio of subject imports to domestic production during the POI fluctuated sharply, *** reported that a ***.[68] *** also reported that *** and that it had ***.[69] It also noted it recently had ***.[70] It testified at the hearing in support of imposition of duties.[71] *** did not submit usable financial data.[72]

[60] CR/PR at Table III-1.
[61] CR/PR at Table III-9.
[62] CR/PR at Table III-9.
[63] Hearing Transcript at 33-34.
[64] CR/PR at Table VI-3.
[65] CR/PR at Table III-3.
[66] CR/PR at Table III-1.
[67] CR/PR at Table III-9.
[68] CR/PR at III-4, and Tables III-3 and VI-7.
[69] CR/PR at III-4, and Tables III-3 and VI-7; Hearing Transcript at 38.
[70] Hearing Transcript at 38.
[71] Hearing Transcript at 38.
[72] *See* CR/PR at VI-1.

Given the foregoing, we find that appropriate circumstances do not exist to exclude *** from the domestic industry as a related party.

***. *** accounted for *** percent of U.S. production in 2018.[73] Its ratio of subject imports to domestic production was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in interim 2018, and *** percent in interim 2019.[74] *** stated that it imported subject merchandise because ***.[75] *** the petition.[76] Its operating income ratio was *** than the average for all domestic producers throughout the POI.[77] Given that the firm's primary interest appears to be in domestic production, we find that appropriate circumstances do not exist to exclude *** from the domestic industry as a related party.

Accordingly, we define the domestic industry to include all U.S. producers of threaded rod, with the exceptions of ***.[78]

[73] CR/PR at Table III-1.
[74] CR/PR at Table III-9.
[75] CR/PR at Table III-9.
[76] CR/PR at Table III-1.
[77] CR/PR at Table VI-3.
[78] Chairman Johanson, as noted above, would not exclude *** as a related party. However, whether two firms (***) or three (***) are excluded, the data on this record show only minimal differences and the trends remain the same. *See, e.g.,* CR/PR at Tables C-1, C-2, and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. Chairman Johanson would therefore reach the same injury determination for the same reasons applying either set of exclusions.

IV. Cumulation[79]

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

> (1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality related questions;
>
> (2) the presence of sales or offers to sell in the same geographic markets of subject imports from different countries and the domestic like product;
>
> (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and
>
> (4) whether the subject imports are simultaneously present in the market.[80]

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

[79] 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 generally shall be deemed negligible. 19 U.S.C. §§ 1673b(a), 1677(24)(A)(i). The exceptions to this general rule are not pertinent here.

Subject imports from Thailand accounted for 3.8 percent of total U.S. imports of threaded rod by quantity during February 2018 through January 2019, the 12-month period preceding the filing of the petition. CR/PR at Table IV-7. Because they exceed the applicable three percent negligibility threshold, we find that subject imports from Thailand are not negligible.

[80] *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).

determining whether the subject imports compete with each other and with the domestic like product.[81] Only a "reasonable overlap" of competition is required.[82] [83]

For purposes of our determination on subject imports from Thailand, we consider subject imports from China, India, Taiwan, Thailand on a cumulated basis because the statutory criteria for cumulation are satisfied for those subject imports, as discussed below. As an initial matter, Vulcan filed the antidumping duty petitions on imports from China, India, Taiwan, and Thailand and the countervailing duty petitions on imports from China and India on the same day, February 21, 2019.[84]

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

[82] The Statement of Administrative Action (SAA) to the Uruguay Round Agreements Act (URAA), states expressly 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.").

[83] Vulcan argues that the Commission should cumulate subject imports from China, India, Taiwan, and Thailand, as the petitions were filed simultaneously and there is a reasonable overlap of competition among the domestic like product and subject imports from the four subject countries. *See* Petitioner Prehearing Brief at 8-9 and Posthearing Brief at 2.

[84] *See* CR/PR at I-1. We observe that these investigations involve dumped or allegedly dumped imports from China, India, Taiwan and Thailand, and allegedly subsidized imports from China and India. Additionally, as indicated above, the scope of the countervailing duty petition on threaded rod from China is broader than the scope of the antidumping duty petition on threaded rod from China. Consequently, any decision to cumulate imports in this investigation will involve "cross-cumulating" dumped imports from Thailand with imports from China preliminarily determined to be subsidized, imports from Taiwan preliminarily determined to have been dumped, and imports from China and India preliminarily determined to have been dumped and subsidized. No party has addressed the issue of cross-cumulation in these investigations. In this investigation, we continue our longstanding practice of cross-cumulating dumped and subsidized imports. *Polyethylene Terephthalate Resin from Canada, China, India, and Oman*, Inv. Nos. 701-TA-531 to 532 and 731-TA-1270 to 1273 (Final), USITC Pub. 4604 at 9-11 (April 2016) at 9-11; *Circular Welded Carbon-Quality Steel Pipe from India, Oman, the United Arab Emirates, and Vietnam*, Inv. Nos. 701-TA-482 to 484 (Final), USITC Pub. 4362 (Dec. 2012) at 12 n.59; *Softwood Lumber from Canada*, Inv. Nos 701-TA-414 and 731-TA-928 (Final), USITC Pub. 3059 (May 2009) at 29-31; *Bingham & Taylor v. United States*, 815 F.2d 982 (Fed. Cir. 1987).

Fungibility. Threaded rod, regardless of source, generally is produced in accordance with industry standards set by ASTM, ASME, or API.[85] Most responding domestic producers and the majority of importers reported that imports from each of the four subject countries are always or frequently interchangeable with each other and the domestic like product.[86] All the remaining domestic producers and almost all of the remaining importers indicated that subject imports from the subject countries are sometimes used interchangeably with each other and with the domestic like product.[87] This is notwithstanding that imports from different subject countries may differ in particular physical characteristics.[88]

Majorities or pluralities of purchasers found the domestic like product and imports from each subject country to be comparable with respect to nearly all of 15 specific purchasing factors.[89] Majorities or pluralities of purchasers found imports from each subject country

[85] CR/PR at I-16 to I-17 and nn.42-50.

[86] CR/PR at Table II-12.

[87] CR/PR at Table II-12.

[88] All subject imports from Thailand and most domestic product and subject imports from India and Taiwan are non-alloy. By contrast, nearly all subject imports from China (and all subject imports from China subject to the antidumping investigation) are alloy. CR/PR at Table IV-5. As the Commission found in its preliminary determination, although there are some applications that require alloy threaded rod, alloy threaded rod may be used interchangeably with carbon threaded rod in many other applications. *Preliminary Determinations,* USITC Pub. 4885 at 8. Vulcan explained that although there are some applications that do not require alloy threaded rod, it may nonetheless be used, particularly when it is priced as low as or lower than the carbon alternative. Hearing Transcript at 25, 28, 47-50. The record supports that there are instances during the POI where alloy threaded rod entered at lower prices than carbon threaded rod. Vulcan Posthearing Brief, Response to Question 3, and CR/PR at Table E-1 (showing, *e.g.*, AUVs for continuously threaded alloy threaded rod from subject countries were at times lower than AUVs for continuously threaded carbon threaded rod from the same country).

[89] The exceptions are price, in comparisons with imports from all four subject countries, and delivery time, in the comparison with subject imports from India. CR/PR at Table II-11.

comparable in most comparisons.[90] Consequently, we find that the domestic like product and threaded rod from each subject source are fungible.

Channels of Distribution. Domestic producers sold threaded rod *** to distributors and importers of threaded rod from each subject country sold predominantly to distributors.[91] In 2018, *** percent of the domestic producers' U.S. shipments of threaded rod, as well as *** percent of subject imports from China, *** percent of subject imports from India, *** percent of subject imports from Taiwan, and *** percent of subject imports from Thailand were sold to distributors.[92]

Geographic Overlap. Domestically produced threaded rod and imports from each of the subject countries were sold throughout the contiguous United States.[93]

Simultaneous Presence in Market. The domestic like product and subject imports from all subject countries were present during each quarter of the period of investigation.[94]

Conclusion. We find that subject imports from China, India, Taiwan, and Thailand are fungible with the domestic like product and each other. We further find that subject imports from each subject country and the domestic like product are sold in the same channels of distribution and in the same geographic markets, and have been simultaneously present in the U.S. market. In light of the foregoing, we conclude that there is a reasonable overlap of competition between the domestic like product and imports from each subject country and

[90] CR/PR at Table II-11. Only two purchasers compared subject imports from China and Thailand, and one responding importer found the subject imports from China inferior to subject imports from Thailand with respect to five factors. *Id.*

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

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

[93] CR/PR at Tables II-2 and IV-6.

[94] CR/PR at Tables IV-7 and V-3 to V-8.

between imports from each subject country. Consequently, we cumulate subject imports from China, India, Taiwan, and Thailand in determining whether the domestic industry is materially injury by reason of subject imports from Thailand.

V. Material Injury By Reason of Subject Imports

Based on the record in the final phase of this investigation, we find that an industry in the United States is materially injured by reason of dumped imports of threaded rod from Thailand.

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.[95] 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.[96] The statute defines "material injury" as "harm which is not inconsequential, immaterial, or unimportant."[97] 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

[95] 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.

[96] 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).

[97] 19 U.S.C. § 1677(7)(A).

States.[98] 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."[99]

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,[100] 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.[101] 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.[102]

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

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[98] 19 U.S.C. § 1677(7)(C)(iii).

[99] 19 U.S.C. § 1677(7)(C)(iii).

[100] 19 U.S.C. §§ 1671d(a), 1673d(a).

[101] *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).

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

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.[103] In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.[104] 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,

[103] 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 Alliance 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.

[104] 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.").

such as nonsubject imports, which may be contributing to overall injury to an industry.[105] It is clear that the existence of injury caused by other factors does not compel a negative determination.[106]

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."[107] The Commission ensures that it has "evidence in the record" to "show that the harm occurred 'by reason of' the LTFV imports," and that it is "not attributing injury from other sources to the subject imports."[108] The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed "rigid adherence to a specific formula."[109]

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

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

[106] *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.").

[107] *Mittal Steel*, 542 F.3d at 876 &78; *see also id.* at 873 ("While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured 'by reason of' subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology.") *citing United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75. In its decision in *Swiff-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission's causation analysis as comporting with the Court's guidance in *Mittal*.

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

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

evidence standard.[110] Congress has delegated this factual finding to the Commission because of the agency's institutional expertise in resolving injury issues.[111]

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 cumulated subject imports.

a. Demand Conditions

U.S. demand for threaded rod is driven by demand for end use products in building construction, particularly nonresidential and industrial construction, and oil and gas extraction. Products incorporating threaded rod include duct hangers, bracing brackets, structural tie downs for sprinkler systems, conduits, electrical wiring, lights, and HVAC units, as well as joint restraint systems for underground piping, concrete anchors, and general framing and anchoring.[112]

Demand generally increased over the POI.[113] Reported apparent U.S. consumption increased by 25.3 percent between 2016 and 2018, and was 12.0 percent higher in interim 2019 than in interim 2018; apparent U.S. consumption by quantity was 354.7 million pounds in

[110] We provide in our discussion below an analysis of any other known factors that may have caused any material injury experienced by the domestic industry.

[111] *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.").

[112] CR/PR at II-10. Oil and gas rotary rigs in operation and building construction spending, the main drivers of demand for threaded rod, each generally increased over the POI. CR/PR at II-11 to II-12 and Figures II-1 and II-2.

[113] A majority of responding U.S. producers and a plurality of responding U.S. importers and purchasers reported that U.S. demand for threaded rod has increased since January 2016. CR/PR at Table II-6.

2016, 394.8 million pounds in 2017, and 444.5 million pounds in 2018; it was 204.3 million pounds in interim 2018 and 228.8 million pounds in interim 2019.[114]

b. Supply Conditions

Cumulated subject imports were the largest source of threaded rod to the U.S. market during the POI. Their U.S. market share increased from 50.5 percent in 2016 to 54.0 percent in 2017 and 59.5 percent in 2018, and was higher in interim 2019, at 60.8 percent, than in interim 2018, at 55.7 percent.[115]

The domestic industry was the next largest supplier of threaded rod to the U.S. market. Its market share declined from *** percent in 2016 to *** percent in 2017 and *** percent in 2018, and was lower in interim 2019, at *** percent, than in interim 2018 at *** percent.[116] The domestic industry's reported capacity decreased by *** percent between 2016 and 2018, from *** pounds in 2016 to *** pounds in 2018;[117] it showed little variation between the interim periods.[118] The domestic industry's reported capacity utilization rate increased from

[114] CR/PR at Tables IV-9 and C-2.

[115] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***.

[116] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. The combined market share of the three excluded related party producers was *** percent in 2016 and *** percent in 2017, 2018, and both interim periods. *Id*.

[117] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. Vulcan reported that it purchased all of the major equipment and assets of Acme's Indianapolis, Indiana facility in August 2017. Vulcan reported that it had planned on installing this equipment to increase production but that this equipment presently is in storage. CR/PR III-3 to III-4 and n.3, and Table III-3.

[118] Capacity was *** pounds in interim 2018 and *** pounds in interim 2019. Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***.

*** percent in 2016 to *** percent in 2017 and *** percent in 2018, and was lower in interim 2019 (*** percent) than in interim 2018 (*** percent).[119]

The market share of nonsubject imports decreased over the POI, from 12.0 percent in 2016 to 9.8 percent in 2017 and 8.4 percent in 2018, and was slightly higher in interim 2019, at 8.5 percent, than in interim 2018 at 8.3 percent.[120]

c. Substitutability and Other Conditions

Based on the record, we find that there is a high degree of substitutability between the domestic like product and cumulated subject imports.[121] All responding U.S. producers and a majority of U.S. importers and purchasers reported that the domestically produced product and subject imports from each subject country are always or frequently interchangeable.[122] Majorities or pluralities of purchasers found the domestically produced product and imports from each subject country to be comparable with respect to nearly all of 15 specific purchasing factors.[123] Majorities or pluralities of purchasers found imports from each subject country comparable in most comparisons.[124]

[119] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***.

[120] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. The largest sources of nonsubject imports in 2018 were Canada, Germany, Japan, Korea, and Mexico. CR/PR at II-8.

[121] CR/PR at II-13 to II-14.

[122] CR/PR at Table II-12.

[123] The exceptions are price, in comparisons with imports from all four subject countries, and delivery time, in a comparison with subject imports from India. CR/PR at Table II-11.

[124] CR/PR at Table II-11. Only two purchasers compared subject imports from China and Thailand, and one responding importer found the subject imports from China inferior to subject imports from Thailand with respect to five factors. *Id.*

Purchasers most frequently cited price as the most important and among the three most important factors in their purchasing decisions for threaded rod.[125] Price, together with availability, quality meets industry standards, reliability of supply, and product consistency, was among the factors purchasers most frequently cited as very important in purchasing decisions.[126] The majority of responding U.S. producers, importers, and purchasers reported that differences other than price between the domestic like product and imports from each subject country and among subject imports from all sources are sometimes or never significant.[127] Accordingly, we find that price is an important factor in purchasing decisions for threaded rod.

Raw materials are the largest component of the total cost of goods sold ("COGS") for threaded rod. U.S. producers reported that raw material costs increased as a share of total COGS, from 69.5 percent in 2016 to 71.8 percent in 2018.[128] The majority of U.S. producers and importers reported that raw material costs increased over the POI.[129] Imports of threaded rod are not subject to the duties imposed pursuant to section 232 of the Trade Expansion Act of 1962 ("section 232 tariffs),[130] but imports of inputs used to produce threaded rod are subject to such tariffs.[131] Most market participants reported that section 232 tariffs and antidumping and countervailing duties on the raw materials to produce threaded rod had an effect on the prices

[125] CR/PR at Table II-8.
[126] CR/PR at Table II-9.
[127] CR/PR at Table II-14.
[128] CR/PR at V-1.
[129] CR/PR at V-2 to V-3.
[130] 19 U.S.C. § 1862.
[131] *See* CR/PR at I-7 to I-8.

for both raw materials and prices for finished threaded rod during the POI.[132] Subject imports from China have been subject to tariffs under section 301 of the Trade Act of 1974[133] since 2018.[134]

Both domestic producers and importers of subject merchandise reported that the vast majority of their sales were on the spot market.[135]

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."[136]

The quantity of cumulated subject imports increased steadily throughout the POI, rising from 179.0 million pounds in 2016 to 213.0 million pounds in 2017 and 264.2 million pounds in 2018; it was higher in interim 2019, at 139.1 million pounds, than in interim 2018, at 113.4 million pounds.[137] The share of apparent U.S. consumption held by cumulated subject imports similarly increased from 50.5 percent in 2016 to 54.0 percent in 2017 and 59.5 percent in 2018; it was 55.7 percent in 2018 and 60.8 percent in interim 2019.[138]

[132] CR/PR at II-4, and Tables II-3 and II-4.
[133] 19 U.S.C. § 2411.
[134] CR/PR at I-8.
[135] *See* CR/PR at V-2 and Table V-1.
[136] 19 U.S.C. § 1677(7)(C)(i).
[137] CR/PR at Table IV-2.
[138] CR/PR at Table IV-2.

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

D. Price Effects of 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.[139]

As previously discussed, the record shows that price is an important consideration in purchasing decisions, and there is a high degree of substitutability between domestically produced threaded rod and cumulated subject imports from China, India, Taiwan, and Thailand.

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of six threaded rod products shipped to unrelated customers during January 2016 to June 2019.[140] Five U.S. producers and 30 importers provided useable

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[139] 19 U.S.C. § 1677(7)(C)(ii).

[140] CR/PR at V-5 to V-6. The pricing products were:

Product 1.--Low-carbon steel fully threaded rod, electroplated with zinc, a 3/8 in diameter, 16 threads per inch, in 10-foot lengths, in cardboard tubes.

Product 2.--Low-carbon steel fully threaded rod, electroplated with zinc, a 1/2 in diameter, 13 threads per inch, in 10-foot lengths, in cardboard tubes.

Product 3.--Low-carbon steel fully threaded rod, electroplated with zinc, a 3/4 in diameter, 10 threads per inch, in 12-foot lengths, in cardboard tubes.

Product 4.--Low-carbon steel fully threaded rod, hot dipped galvanized, a 5/8 in diameter, 11 threads per inch, in 12-foot lengths, in cardboard tubes.

pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters. Pricing data for these firms accounted for approximately 21.4 percent of the domestic industry's shipments of threaded rod and 23.4 percent of U.S. shipments of cumulated subject imports.[141]

Based on the reported pricing data, cumulated subject imports were priced lower than threaded rod sold by the domestic industry in 180 of 271 quarterly comparisons (66.4 percent of comparisons), at margins ranging from 0.1 percent to 41.3 percent, and an average margin of 10.1 percent. The data also show predominant underselling by volume, with 98.9 million pounds of subject imports in quarters with instances of underselling compared to 13.6 million pounds of subject imports in quarters with instances of overselling.[142]

Moreover, 22 purchasers responding to the Commission's U.S. purchaser questionnaire indicated that subject imports were priced lower than domestic product, and 14 purchasers reported that price was the primary reason that they purchased subject imports rather than the domestic product. The quantity of subject imports that these purchasers purchased instead of domestic product was 23.4 million pounds.[143] Thus, the record indicates that this underselling caused the domestic industry to lose sales to cumulated subject imports.

The domestic industry lost *** percentage points of market share to cumulated subject imports from 2016 to 2018; additionally, the *** percentage points of market share that

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Product 5.--Alloy steel fully threaded rod, produced to ASTM A193 Grade B7, a 3/4 inch diameter, 10 threads per inch, in 12-foot lengths, in cardboard tubes.

Product 6.--Alloy steel fully threaded rod, produced to ASTM A193 Grade B7, a 1-1/4 inch diameter, 8 threads per inch, in 12-foot lengths, in cardboard tubes.

[141] CR/PR at V-6.

[142] Derived from CR/PR at Table V-10 and *** U.S. Producer Questionnaire, EDIS Doc. ***.

[143] CR/PR at V-23 and Table V-14.

cumulated subject imports gained between interim 2018 and interim 2019 came solely at the expense of the domestic industry.[144] Because price is an important factor in purchasing decisions and subject imports and the domestic like product are highly substitutable, the shifts in market share from the domestic industry to subject imports appear to be the direct result of subject import pricing. Based on the above discussion, we find the underselling by subject imports to be significant.

We have also considered price trends. The data on the record show that prices for threaded rod from all sources generally increased during the POI. The reported pricing data show that prices for domestically produced threaded rod increased from the first quarter of 2016 through the second quarter of 2019, with the increases ranging from *** percent to *** percent for the six pricing products.[145] The data also show that subject import prices for four of six pricing products increased during the period.[146] Accordingly, we find that cumulated subject imports did not depress prices of the domestic like product to a significant degree.

Vulcan argues for a finding of significant price suppression based on its asserted inability to pass on rising raw material costs by increasing prices.[147] The domestic industry's ratio of COGS to net sales increased during the full years of the POI, from *** percent in 2016 to *** percent in 2017 and *** percent in 2018, but was lower in interim 2019, at *** percent, than in

[144] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***.

[145] Derived from CR/PR at Table V-9 and *** U.S. Producer Questionnaire Response.

[146] CR/PR at Table V-9. Subject import prices for pricing product 4 decreased over the period, as did prices for product 3 from India. *Id*.

[147] Vulcan Prehearing Brief at 16-18 and Posthearing Brief, Response to Question 1.

interim 2018, at *** percent.[148] From 2016 to 2018, net sales value on a per pound basis rose generally with per pound raw material costs; moreover, net sales values per pound increased more than the per pound raw material costs comparing interim 2019 and interim 2018.[149] There was also little correlation between changes in the COGS/net sales ratio and changes in subject import volumes. The deterioration in the COGS/net sales ratio occurred mainly from 2016 to 2017 although the increase in cumulated subject import volume was greater from 2017 to 2018 than from 2016 to 2017. Moreover, the COGS/sales ratio was lower in interim 2019 than in interim 2018, notwithstanding that cumulated subject import volume and market share were higher in interim 2019 than in interim 2018.[150] In light of this, we find insufficient evidence on this record to find that subject imports prevented price increases that otherwise would have occurred to a significant degree.[151]

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[148] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***.

[149] Net sales values rose $*** per pound between 2016 and 2018, while the net values of raw materials rose $*** per pound during the same period. Derived from CR/PR at Table VI-2 and U.S. Producers Questionnaire responses. Net sales values rose $*** per pound between interim 2018 and interim 2019, while those of raw materials rose $*** per pound. *Id*.

[150] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. The domestic industry's COGS/net sales ratio was *** percent in interim 2018 and *** percent in interim 2019. CR/PR at Table C-2. AUVs of raw materials per pound were $*** in interim 2018 and $*** per pound in interim 2019. Derived from CR/PR at Table VI-1 and U.S. Producers Questionnaire Responses.

[151] Commissioners Schmidtlein and Kearns find that subject imports prevented price increases that otherwise would have occurred to a significant degree. As discussed above, the domestic industry's ratio of COGS to net sales increased during the full years of the POI, from *** percent in 2016 to *** percent in 2018, and the level in interim 2019, *** percent, remained higher than that in 2016. While the domestic industry's per pound net sales value and raw materials cost both rose from 2016 to 2018, the ratio of raw material costs to net sales increased substantially, from *** percent in 2016 to *** percent in 2017 and *** percent in 2018; the level in interim 2019, *** percent, remained higher than the 2016 level. Derived from CR/PR at Table VI-1 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. Moreover, the increase in per pound raw materials cost from 2016 to 2017, $***, was much higher than the per pound increase in net sales value, $***. *Id.* At the same time, apparent consumption grew substantially, by 11.3 percent in 2017 and 12.6 percent in 2018, for an overall

In sum, the record indicates significant underselling by cumulated subject imports that led to lost sales and shifts in market share from the domestic industry to subject imports. We therefore find that subject imports had significant adverse price effects on the domestic industry.

E. Impact of Subject Imports[152]

Section 771(7)(C)(iii) of the Tariff Act provides that in examining the impact of subject imports, the Commission "shall evaluate all relevant economic factors which have a bearing on the state of the industry."[153] These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to

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increase of 25.3 percent. CR/PR at Table C-2. In addition, most sales were on the spot market, and transaction-by-transaction pricing methods were the most common. CR/PR at Tables V-1 and V-2. Under these circumstances, the domestic industry should have been able to cover more of their increasing costs. We find that the significant and increasing volumes of subject imports, and their pervasive underselling, prevented such increases, and therefore conclude that subject imports significantly suppressed prices for the domestic product.

[152] The statute instructs the Commission to consider the "magnitude of the dumping margin" in an antidumping proceeding as part of its consideration of the impact of imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final determination, Commerce found dumping margins of 20.83 percent for imports from Thailand. *See* Final Commerce Determination (Thailand), 84 Fed. Reg. at 56163. In its preliminary dumping determinations, Commerce found dumping margins of 4.81 percent to 59.45 percent on subject imports from China, 2.04 percent on subject imports from India, and 32.26 percent on subject imports from Taiwan. *See* Preliminary Commerce AD Determination (China), 84 Fed. Reg. at 50380; Preliminary Commerce AD Determination (India), 84 Fed. Reg. at 50377; and Preliminary Commerce AD Determination (Taiwan), 84 Fed. Reg. at 50383. We take into account in our analysis the fact that Commerce has made preliminary or final findings that subject producers in China, India, Taiwan, and Thailand are selling subject imports in the United States at less than fair value. In addition to this consideration, our impact analysis has considered other factors affecting domestic prices. Our analysis of the significant underselling of subject imports, described in both the price effects discussion and below, is particularly probative to an assessment of the impact of the subject imports.

[153] 19 U.S.C. § 1677(7)(C)(iii); *see also* SAA at 851 and 885 ("In material injury determinations, the Commission considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they also may demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.").

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."[154]

We find that cumulated subject imports had a significant impact on the domestic industry during the POI. From 2016 to 2018, while most of the domestic industry's trade and employment performance indicators were improving, these increases were at a rate far below the substantial 25.3 percent increase in apparent U.S. consumption during that period. Moreover, as the domestic industry lost market share to low-priced subject imports,[155] its profitability declined.

The domestic industry's production increased by *** percent between 2016 and 2018, from *** pounds in 2016 to *** pounds in 2017 and *** pounds in 2018.[156] The domestic industry's production capacity decreased by *** percent between 2016 and 2018, declining from *** pounds in 2016 to *** pounds and *** pounds in 2018.[157] The industry's capacity utilization increased by *** percentage points from 2016 to 2018, from *** percent in 2016 to *** percent in 2017 and *** percent in 2018.[158]

[154] 19 U.S.C. § 1677(7)(C)(iii). This provision was amended by the Trade Preferences Extension Act of 2015, Pub. L. 114-27.

[155] Commissioners Schmidtlein and Kearns also find, as discussed above, significant price suppression by subject imports.

[156] CR/PR at Table C-2. The industry's production was *** pounds in interim 2018 and *** pounds in interim 2019. *Id*.

[157] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. The industry's capacity was *** pounds in interim 2018 and *** pounds in interim 2019. *Id*.

[158] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. The industry's capacity utilization was *** percent in interim 2018 and *** percent in interim 2019. *Id*.

U.S. shipments, by quantity, rose *** percent from 2016 to 2018, increasing from *** pounds in 2016 to *** pounds in 2017, before decreasing to *** pounds in 2018.[159] Inventories declined from *** pounds in 2016 to *** pounds in 2017 and then rose to *** pounds in 2018.[160]

Because its U.S. shipments increased less rapidly than apparent U.S. consumption, the domestic industry's share of apparent U.S. consumption fell by *** percentage points from 2016 to 2018. The industry's market share decreased from *** percent in 2016 to *** percent in 2017 and *** percent in 2018, and was lower in interim 2019 than in interim 2018.[161]

Employment increased by *** percent from 2016 to 2018, increasing from *** production-related workers ("PRWs") in 2016 to *** PRWs in 2017, before decreasing to *** PRWs in 2018.[162] Hours worked rose *** percent from 2016 to 2018, increasing from *** hours in 2016 to *** hours in 2017, before declining to *** hours in 2018.[163] Wages paid increased by *** percent from 2016 to 2018, increasing from $*** in 2016 to $*** in 2017 and $*** in

[159] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. U.S. shipments were *** pounds in interim 2018 and *** pounds in interim 2019. *Id*.

[160] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. Inventories were *** pounds in interim 2018 and *** pounds in interim 2019. *Id*.

[161] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. The industry's share of apparent U.S. consumption was *** percent in interim 2018 and *** percent in interim 2019. *Id*.

[162] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. The number of PRWs was *** in interim 2018 and *** in interim 2019. *Id*.

[163] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. Hours worked were *** in interim 2018 and *** in interim 2019. *Id*.

2018.[164] Productivity (in pounds per hour) rose by *** percent from 2016 to 2018, declining from *** in 2016 to *** in 2017, and then increasing to *** in 2018.[165]

Sales revenues rose by *** percent from 2016 to 2018, increasing from $*** in 2016 to $*** in 2017 and $*** in 2018.[166] Total COGS rose by *** percent from 2016 to 2018, increasing from $*** in 2016 to $*** in 2017 and $*** in 2018.[167] Gross profit declined by *** percentage points from 2016 to 2018, declining from $*** in 2016 to $*** in 2017, then increasing to $*** in 2018.[168]

Operating income fell by *** percent from 2016 to 2018, decreasing from $*** in 2016 to $*** in 2017, before increasing to $*** in 2018.[169] The industry's operating income margin fell *** percentage points from 2016 to 2018, decreasing from *** percent in 2016 to *** percent in 2017, and then increasing to *** percent in 2018.[170] Net income declined by *** percent from 2016 to 2018, decreasing from $*** in 2016 to $*** in 2017, then increasing to

[164] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. Wages paid were $*** in interim 2018 and $*** in interim 2019. Hourly wages also increased by *** percent, from $*** in 2016 to $*** in 2017 to $*** in 2018, and were $*** in interim 2018 and $*** in interim 2019. *Id*.

[165] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. Productivity (in pounds per hour) was *** in interim 2018 and *** in interim 2019. *Id*.

[166] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. Revenues were $*** in interim 2018 and $*** in interim 2019. *Id*.

[167] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. Total COGS were $*** in interim 2018 and $*** in interim 2019. *Id*.

[168] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. Gross profit was $*** in interim 2018 and $*** in interim 2019. *Id*.

[169] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. Operating income was $*** in interim 2018 and $*** in interim 2019. *Id*.

[170] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. The industry's operating income margin was *** percent in interim 2018 and *** percent in interim 2019. *Id*.

$*** in 2018.[171] Capital expenditures fluctuated, increasing from $*** in 2016 to $*** in 2017, then decreasing to $*** in 2018.[172]

As discussed above, the record shows significant underselling by subject imports and that the domestic industry lost sales and market share due to competition from low-priced subject imports.[173] Although the industry's production, shipments, and employment improved over the period, these improvements were not commensurate with the increases in apparent U.S. consumption and occurred while the industry had substantial excess capacity. Consequently, the industry's production and shipments were less than they would have been otherwise. As a result, the industry's revenues and financial performance were also lower than they would have been otherwise.[174] We therefore find that cumulated subject imports had a significant adverse impact on the domestic industry during the period of investigation.

In our analysis of the impact of subject imports on the domestic industry, we have taken into account whether there are other factors that may have had an adverse impact during the POI to ensure that we are not attributing injury from other factors to the subject imports. Nonsubject imports had a declining presence in the U.S. market during most of the POI. The market share of nonsubject imports declined *** percentage points between 2016 and 2018,

[171] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. Net income was $*** in interim 2018 and $*** in interim 2019. *Id*.

[172] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. Capital expenditures were $*** in interim 2018 and $*** in interim 2019. The domestic industry incurred nominal research and development expenses during the POI. CR/PR at Table VI-4.

[173] Commissioners Schmidtlein and Kearns also find, as discussed above, significant price suppression by subject imports.

[174] Commissioners Schmidtlein and Kearns also find that the industry's revenues and financial performance were lower than they would have been otherwise due to the significant price suppression caused by subject imports.

and showed little variation between the interim periods.[175] Thus, nonsubject imports cannot explain the domestic industry's loss of market share during the POI.

Accordingly, we determine that the domestic threaded rod industry is materially injured by reason of dumped imports of threaded rod from Thailand.

VI. Critical Circumstances

A. Legal Standards

In its final determination concerning threaded rod from Thailand, Commerce found that critical circumstances exist with respect to all producers/exporters in Thailand. Because we have determined that the domestic industry is materially injured by reason of subject imports from Thailand, 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."[176] 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."[177] The legislative history for the critical circumstances provision indicates that the provision was designed "to deter exporters whose merchandise is

[175] Derived from CR/PR at Table C-2 and *** U.S. Producer Questionnaire Response, EDIS Doc. ***. The market share of nonsubject imports decreased from *** percent in 2016 to *** percent in 2017 and *** percent in 2018, and was *** percent in interim 2018 and *** percent in interim 2019. *Id*.

[176] 19 U.S.C. §§ 1671d(b)(4)(A)(ii), 1673d(b)(4)(A)(ii).

[177] SAA at 877.

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}."[178] 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.[179]

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 of the petition using monthly statistics on the record regarding those firms for which Commerce has made an affirmative critical circumstances determination.[180]

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[178] *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).

[179] 19 U.S.C. §§ 1671d(b)(4)(A)(ii), 1673d(b)(4)(A)(ii).

[180] *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).

B. Analysis

We first consider the appropriate period for comparison of pre-petition and post-petition levels of the imports subject to the affirmative critical circumstances finding. While the Commission typically considers six-month periods, it has relied on a shorter comparison period when Commerce's preliminary determination fell within the six-month post-petition period.[181] We observe that the petitioner did not make any comments regarding critical circumstances. Commerce's published its preliminary determination with respect to threaded rod from Thailand on August 7, 2019 -- slightly less than five months after the petition was filed.[182] In light of these considerations, in this investigation we have analyzed volumes of the imports subject to the critical circumstances determination using both five-month and six-month comparison periods.

An analysis using five-month periods shows a decrease in the volume of subject imports from Thailand of *** percent in the post-petition period, from *** pounds in the period October 2018 through February 2019 to *** pounds in the period March 2019 through July 2019. An analysis using six-month periods shows a decrease in the volume of subject imports from Thailand of *** percent in the post-petition period, from *** pounds in the period

[181] In particular, the Commission has used five-month periods in recent investigations where the timing of the first preliminary Commerce determination authorizing the imposition of provisional duties would have served to reduce subject import volume in the sixth month of the post-petition period. *See, e.g., Cold-Rolled Steel Flat Products from China and Japan,* Inv. Nos. 701-TA-541 and 731-TA-1284 and 1286 (Final), USITC Pub. 4619 (July 2016); *Polyethylene 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 31-32 (Apr. 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 caused reduction of subject import volume in sixth month).

[182] *Carbon and Alloy Steel Threaded Rod From Thailand: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Affirmative Determination of Critical Circumstances*, 84 Fed. Reg. 38597 (Aug. 7, 2019); *see also* CR/PR at Table I-1.

September 2018 through February 2019 to *** pounds in the period March 2019 through August 2019.[183] Available information show that U.S. importers' end-of-period inventories of subject imports from Thailand were *** pounds in December 2018 and *** pounds in June 2019.[184]

Given the decrease in import volume in the post-petition periods (regardless of the interval analyzed) and the lower inventories in June 2019, we find that the imports subject to Commerce's affirmative critical circumstances determination would not undermine seriously the remedial effect of the antidumping duty order. Consequently, and in the absence of any other circumstances indicating that the remedial effect of the antidumping duty order would seriously be undermined, we make a negative critical circumstances determination with regard to subject imports from Thailand subject to Commerce's affirmative critical circumstances finding.

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 threaded rod from Thailand that are sold in the United States at less than fair value. We also determine that critical circumstances do not exist with respect to imports of threaded rod from Thailand for which Commerce made an affirmative critical circumstances determination.

[183] CR/PR at Table IV-3.
[184] CR/PR at Table VII-12.

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 Vulcan Threaded Products Inc. ("Vulcan"), Pelham, Alabama, on February 21, 2019, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized imports of carbon and alloy steel threaded rod ("threaded rod")[1] from China and India and by less-than-fair-value ("LTFV") imports of threaded rod from China, India, Taiwan, and Thailand. The following tabulation provides information relating to the background of these investigations.[2] [3]

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

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

[3] A list of witnesses appearing at the hearing is presented in appendix B of this report.

Effective date	Action
February 21, 2019	Petitions filed with Commerce and the Commission; institution of Commission's investigations (84 FR 6817, February 28, 2019)
March 13, 2019	Commerce's notice of initiation of AD and CVD investigations (84 FR 10034 and 84 FR 10040, March 19, 2019)
April 8, 2019	Commission's preliminary determinations (84 FR 14971, April 12, 2019)
April 25, 2019	Commerce's postponement of China's and India's preliminary CVD determinations (84 FR 17379)
June 14, 2019	Commerce's postponement of preliminary determinations in LTFV investigations for India, Taiwan, and China (84 FR 27764)
July 29, 2019	Commerce's preliminary affirmative CVD determinations and alignment of final CVD and AD determinations for China (84 FR 36578) and India (84 FR 36570)
August 7, 2019	Commerce's preliminary affirmative determination of sales at LTFV and critical circumstances for Thailand (84 FR 38597)
August 7, 2019	Scheduling of final phase of Commission's investigations (84 FR 44916, August 27, 2019)
September 25, 2019	Commerce's preliminary determination of sales at LTFV, postponement of final determination, and extension of provisional measures for China (84 FR 50379) and India (84 FR 50376); and preliminary affirmative determination of sales at LTFV for Taiwan (84 FR 50382)
October 15, 2019	Commission's hearing
October 21, 2019	Commerce's final affirmative determination of sales at LTFV and critical circumstances for Thailand (84 FR 56162)
November 15, 2019	Commission's vote (Thailand)
December 5, 2019	Commission's views (Thailand)
Pending	Commission's vote (Taiwan)
Pending	Commission's vote (China and India)

Statutory criteria

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

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

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

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

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

negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment, (IV) actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and (V) in {an antidumping investigation}, the magnitude of the margin of dumping.

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

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

Organization of report

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

Market summary

Threaded rod is generally used in commercial construction to suspend electrical conduit, pipes for plumbing, HVAC ductwork, and sprinkler systems. The leading U.S. producer of threaded rod is Vulcan, while leading producers of threaded rod outside the United States include *** of India and *** of Thailand.[6] The leading U.S. importer of threaded rod from China is ***; the leading

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

[6] *Certain Steel Threaded Rod from Thailand,* Investigation No. 731-TA-1214 (Final), USITC Pub. 4462 (May 2014), p. VII-4.

U.S. importers of threaded rod from India are ***. The leading importer of threaded rod from nonsubject sources is ***. U.S. purchasers of threaded rod are firms that generally distribute threaded rod to builders and contractors in the construction and oil and gas sectors; leading purchasers include ***.

Apparent U.S. consumption of threaded rod totaled approximately 444.5 million pounds ($443.9 million) in 2018. Currently, ten firms are known to produce threaded rod in the United States. U.S. producers' U.S. shipments of threaded rod totaled 142.7 million ($122.6 million) in 2018, and accounted for 32.1 percent of apparent U.S. consumption by quantity and 27.6 percent by value. U.S. imports from subject sources totaled 264.2 million ($216.5 million) in 2018 and accounted for 59.5 percent of apparent U.S. consumption by quantity and 48.8 percent by value. U.S. imports from nonsubject sources totaled 37.5 million ($104.7 million) in 2018 and accounted for 8.4 percent of apparent U.S. consumption by quantity and 23.6 percent by value.

Summary data and data sources

A summary of data collected in these investigations is presented in appendix C, table C-1.[7] Except as noted, U.S. industry data are based on questionnaire responses of nine firms that accounted for the vast majority of U.S. production of threaded rod during 2018. U.S. imports are based on official Commerce statistics using statistical reporting numbers 7318.15.5051, 7318.15.5056, and 7318.15.5090 of the Harmonized Tariff Schedule of the United States (HTSUS).

Previous and related investigations

Antidumping and countervailing duty investigations

Threaded rod has been the subject of two prior countervailing and antidumping duty investigations in the United States.

[7] Commerce did not postpone its final antidumping duty determination regarding imports from Thailand as it did the other antidumping duty determinations. The schedule and the time available for investigation in the Commission's proceeding reflect the timing of Commerce's final antidumping duty determination with respect to threaded rod from Thailand. As of the completion of this report, all other final determinations by Commerce are pending.

On March 5, 2008, Vulcan filed an antidumping duty petition against imports of certain threaded rod from China.[8] Following an affirmative determination by Commerce, on April 6, 2009, the Commission determined that the U.S. threaded rod industry was materially injured by reason of imports of threaded rod from China.[9] Commerce issued an antidumping duty order on Chinese imports of threaded rod in April 2009, with margins ranging from 55.16 percent to 206.00 percent.[10] The Commission instituted a five-year review of the order on March 3, 2014. On June 6, 2014, the Commission determined that it would conduct an expedited review.[11] On June 26, 2014, Commerce published its determination that revocation of the antidumping duty order would be likely to lead to continuation or recurrence of dumping.[12] On August 8, 2014, the Commission notified Commerce of its determination that material injury would be likely to continue or recur within a reasonably foreseeable time.[13] Following affirmative determinations

[8] The scope of the investigation included steel threaded rod, bar, or studs, in which: (1) iron predominates, by weight, over each of the other contained elements; (2) the carbon content is 2 percent or less, by weight; and (3) none of the elements listed below exceeds the quantity, by weight, respectively indicated:

- 1.80 percent of manganese, or
- 1.50 percent of silicon, or
- 1.00 percent of copper, or
- 0.50 percent of aluminum, or
- 1.25 percent of chromium, or
- 0.30 percent of cobalt, or
- 0.40 percent of lead, or
- 1.25 percent of nickel, or
- 0.30 percent of tungsten, or
- 0.012 percent of boron, or
- 0.10 percent of molybdenum, or
- 0.10 percent of niobium, or
- 0.41 percent of titanium, or
- 0.15 percent of vanadium, or
- 0.15 percent of zirconium.

[9] *Certain Steel Threaded Rod from the People's Republic of China: Final Determination of Sales at Less Than Fair Value*, 74 FR 8907, February 27, 2009; and *Certain Steel Threaded Rod From China Determination*, 74 FR 16427, April 10, 2009.

[10] *Certain Steel Threaded Rod from the People's Republic of China: Notice of Antidumping Duty Order*, 74 FR 17154, April 14, 2009.

[11] *Certain Steel Threaded Rod From China; Institution of a Five-Year Review*, 79 FR 11827, March 3, 2014; and *Steel Threaded Rod From China; Scheduling of an Expedited Five-Year Review*, 79 FR 34783, June 18, 2014.

[12] *Certain Steel Threaded Rod from the People's Republic of China: Final Results of Expedited Sunset Review of the Antidumping Duty Order*, 79 FR 36288, June 26, 2014.

[13] *Certain Steel Threaded Rod From China*, 79 FR 46450, January 22, 2014.

in the five-year review by Commerce and the Commission, effective August 19, 2014, Commerce issued a continuation of the antidumping duty order on imports of certain threaded rod from China.[14] The Commission instituted a second-year review of the order on July 1, 2019.[15]

On June 27, 2013, All American Threaded Products, Inc., Bay Standard Manufacturing Inc., and Vulcan filed a countervailing duty petition against imports of certain threaded rod from India and antidumping duty petitions against imports of certain threaded rod from India and Thailand. On August 18, 2014, the Commission determined that the U.S. threaded rod industry was not materially injured or threatened with material injury, and the establishment of an industry in the United States was not materially retarded by reason of imports of certain threaded rod from India and Thailand that had been found by Commerce to be sold in the United States at LTFV and subsidized by the government of India.[16]

Overview on Section 232 and Section 301 proceedings

On March 8, 2018, the President issued a proclamation adjusting imports of steel mill products into the United States, under Section 232 of the Trade Expansion Act of 1962, as amended (19 U.S.C. 1862), providing for additional import duties, effective March 23, 2018.[17] While imports of subject threaded rod are not subject to the Section 232 investigation, imports of raw materials such as carbon and alloy steel wire rod and carbon and alloy steel bar are among the articles subject to the additional 25-percent national-security tariff.[18] Subsequent proclamations were issued on March 22, 2018, April 30, 2018, and May 31, 2018 adjusting the scope of these measures.[19] As of June 1, 2018, imports of the specified raw materials from all

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[14] *Certain Steel Threaded Rod From the People's Republic of China: Continuation of Antidumping Duty Order*, 79 FR 49050, August 19, 2014.

[15] *Initiation of Five-year (Sunset) Reviews,* 84 FR 31304, July 1, 2019.

[16] *Certain Steel Threaded Rod From Thailand*, 79 FR 26267, May 7, 2014; and *Certain Steel Threaded Rod From India*, 79 FR 49810, August 22, 2014.

[17] *Adjusting Imports of Steel into the United States*, Presidential Proclamation 9705, March 8, 2018, 83 FR 11625, March 15, 2018.

[18] U.S. Customs and Border Protection, "Section 232 Tariffs on Aluminum and Steel," February 27, 2019, https://www.cbp.gov/trade/programs-administration/entry-summary/232-tariffs-aluminum-and-steel, (accessed March 15, 2018).

[19] *Adjusting Imports of Steel into the United States*, Presidential Proclamation 9711, March 22, 2018, 83 FR 13361, March 28, 2018; *Adjusting Imports of Steel into the United States*, Presidential Proclamation 9740, April 30, 2018, 83 FR 20683, May 7, 2018; *Adjusting Imports of Steel into the United States*, Presidential Proclamation 9740, April 30, 2018, 83 FR 20683, May 7, 2018; *Adjusting Imports of Steel into the United States*, Presidential Proclamation 9759, May 31, 2018, 83 FR 25857, June 5, 2018.

countries of origin except Argentina, Australia, Brazil, and South Korea have been subject to a 25 percent ad valorem duty, while imports of certain steel mill products from Argentina, Brazil, and South Korea are subject to an absolute annual quota.[20]

Threaded rod that is the product of China is subject to a 25-percent ad valorem additional duty under Section 301 of the Trade Act of 1974 under all 3 subheadings.[21] On September 3, 2019, the Office of the U.S. Trade Representative (USTR) began soliciting public comments regarding a proposed modification of the section 301 tariff rate to 30 percent.[22] If adopted, the proposed modification was scheduled to take effect on October 1, 2019.[23] The proposed modification was then delayed to October 15, 2019.[24] As of October 11, 2019, the proposed modification was halted due to ongoing trade negotiations.[25] Appendix D contains an overview of relevant trade actions. Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

[20] U.S. Customs and Border Protection, "Section 232 Tariffs on Aluminum and Steel," February 27, 2019, https://www.cbp.gov/trade/programs-administration/entry-summary/232-tariffs-aluminum-and-steel, (accessed March 15, 2018).

[21] USTR, *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 FR 47974, September 21, 2018.

[22] USTR, *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 FR 46212, September 3, 2019.

[23] Ibid.

[24] "Trump Agrees to 2-Week Delay in China Tariff Increase," *Associated Press*, September 11, 2019, https://www.apnews.com/402432900d6645849061268 18d0257c9; and Melissa Leon, "Trump Delays Tariff Increase on $250B in Chinese Goods for Two Weeks to Oct. 15," *Fox News*, September 11, 2019, https://www.foxnews.com/politics/trump-delays-tariff-increase-250-billion-in-chinese-goods-gesture-of-good-will.

[25] James Politi and Richard Henderson, "US Agrees Limited Trade Deal with China," *Financial Times,* October 11, 2019, https://www.ft.com/content/28cc18f0-ec61-11e9-a240-3b065ef5fc55; and David J. Lynch, "Trump Announces Partial Trade Deal with China, Lifting Hopes That Tensions Could Ease," *The Washington Post,* October 11, 2019, https://www.washingtonpost.com/business/2019/10/11/us-stocks-poised-big-bounce-expectations-grow-us-china-trade-deal/.

Nature and extent of subsidies and sales at LTFV

Subsidies

On July 29, 2019, Commerce published a notice in the *Federal Register* of its preliminary determination of countervailable subsidies for producers and exporters of threaded rod from China.[26] Table I-1 presents Commerce's findings of subsidization of threaded rod in China.

Table I-1
Threaded rod: Commerce's preliminary subsidy determination with respect to imports from China

Entity	Preliminary countervailable subsidy margin (percent)	Final countervailable subsidy margin (percent)
Ningbo Zhongjiang High Strength Bolts Co., Ltd.	23.41	Pending
Zhejiang Junyue Standard Part Co., Ltd.	24.89	Pending
All others	23.83	Pending

Source: 84 FR 36578, July 29, 2019.

On July 29, 2019, Commerce published a notice in the *Federal Register* of its preliminary determination of countervailable subsidies for producers and exporters of product from India.[27] Table I-2 presents Commerce's findings of subsidization of threaded rod in India.

Table I-2
Threaded rod: Commerce's preliminary subsidy determination with respect to imports from India

Entity	Preliminary countervailable subsidy margin (percent)	Final countervailable subsidy margin (percent)
Daksh Fasteners	155.03	Pending
Mangal Steel Enterprises Limited	6.07	Pending
All others	6.07	Pending

Source: 84 FR 36570, July 29, 2019.

[26] *Carbon and Alloy Steel Threaded Rod From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination,* 84 FR 36578, July 29, 2019.

[27] *Carbon and Alloy Steel Threaded Rod From India: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination,* 84 FR 36570, July 29, 2019.

Sales at LTFV

On August 7, 2019, Commerce published a notice in the *Federal Register* of its preliminary determination of sales at LTFV with respect to imports from Thailand.[28] On September 25, 2019, Commerce published notices in the *Federal Register* of its preliminary determinations of sales at LTFV with respect to imports from China,[29] India,[30] and Taiwan.[31] On October 21, 2019, Commerce published its notice of final determination of sales at LTFV with respect to imports from Thailand.[32] Tables I-3, I-4, I-5, and I-6 present Commerce's dumping margins with respect to imports of threaded rod from China, India, Taiwan, and Thailand.

[28] *Carbon and Alloy Steel Threaded Rod From Thailand: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Affirmative Determination of Critical Circumstances,* 84 FR 38597, August 7, 2019.

[29] *Alloy and Certain Carbon Steel Threaded Rod from the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination and Extension of Provisional Measures*, 84 FR 50379, September 25, 2019.

[30] *Carbon and Alloy Steel Threaded Rod From India: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures*, 84 FR 50376, September 25, 2019.

[31] *Carbon and Alloy Steel Threaded Rod From Taiwan: Preliminary Affirmative Determination of Sales at Less Than Fair Value,* 84 FR 50382, September 25, 2019.

[32] *Carbon and Alloy Steel Threaded Rod from Thailand: Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances*, 84 FR 56162, October 21, 2019.

Table I-3
Threaded rod: Commerce's preliminary weighted-average LTFV margins with respect to imports from China

Exporter	Producer	Preliminary dumping margin (percent)	Final dumping margin (percent)
Ningbo Zhongjiang High Strength Bolts Co., Ltd.	Ningbo Zhongjiang High Strength Bolts Co., Ltd.	27.07	Pending
Zhejiang Junyue Standard Part Co., Ltd.	Zhejiang Junyue Standard Part Co., Ltd.	4.81	Pending
Cooper & Turner (Ningbo) International Trading Co., Ltd.	Zhejiang Cooper & Turner Fasteners Co. Ltd.	21.04	Pending
Cooper & Turner (Ningbo) International Trading Co., Ltd.	Zhejiang Morgan Brother Technology Co., Ltd.	21.04	Pending
Cooper & Turner (Ningbo) International Trading Co., Ltd.	Zhejiang Huiyou Import & Export Co., Ltd.	21.04	Pending
EC International (Nantong) Co., Ltd.	Ningbo Zhongjiang High Strength Bolts Co., Ltd.	21.04	Pending
EC International (Nantong) Co., Ltd.	Ningbo Zhenghai Yongding Fasteners Manufacture Co., Ltd.	21.04	Pending
EC International (Nantong) Co., Ltd.	Zhejiang Junyue Standard Part Co., Ltd.	21.04	Pending
EC International (Nantong) Co., Ltd.	Haiyan Qinshan Rubber Factory	21.04	Pending
IFI & Morgan Ltd.	Zhejiang Morgan Brother Technology Co., Ltd.	21.04	Pending
Jiaxing Genteel Import & Export Co., Ltd.	Ningbo Zhenhai Zhongbiao Standard Parts Factory	21.04	Pending
Ningbo Dingtuo Imp. & Exp. Co., Ltd.	Ningbo Jinding Fastening Piece Co., Ltd.	21.04	Pending
Zhejiang Heiter Mfg & Trade Co., Ltd.	Zhejiang Golden Automotive Fastener Co., Ltd.	21.04	Pending
Ningbo Jinding Fastening Piece Co., Ltd	Ningbo Jinding Fastening Piece Co., Ltd	21.04	Pending
Ningbo Qunli Fastener Manufacture Co., Ltd.	Ningbo Qunli Fastener Manufacture Co., Ltd.	21.04	Pending
Nantong Runyou Metal Products Co., Ltd.	Nantong Runyou Metal Products Co., Ltd.	21.04	Pending
Ningbo Shareway Import & Export, Co., Ltd.	Zhejiang Junyue Standard Parts Co., Ltd.	21.04	Pending

Table continued on next page.

Table I-3—Continued
Threaded rod: Commerce's preliminary weighted-average LTFV margins with respect to imports from China

Exporter	Producer	Preliminary dumping margin (percent)	Final dumping margin (percent)
Ningbo Xingsheng Oil Pipe Fittings Manufacture Co., Ltd.	Ningbo Xingsheng Oil Pipe Fittings Manufacture Co., Ltd.	21.04	Pending
Ningbo Zhenghai Yongding Fastener Co., Ltd.	Ningbo Zhenghai Yongding Fastener Co., Ltd.	21.04	Pending
RMB Fasteners Ltd.	Zhejiang Morgan Brother Technology Co., Ltd.	21.04	Pending
Zhejiang Morgan Brother Technology Co., Ltd.	Zhejiang Morgan Brother Technology Co., Ltd.	21.04	Pending
All others		59.45	Pending

Source: 84 FR 50379, September 25, 2019.

Table I-4
Threaded rod: Commerce's preliminary weighted-average LTFV margins with respect to imports from India

Exporter/Producer	Preliminary dumping margin (percent)	Final dumping margin (percent)
Daksh Fasteners	2.04	Pending
Mangal Steel Enterprise Limited	2.04	Pending
All others	2.04	Pending

Source: 84 FR 50376, September 25, 2019.

Table I-5
Threaded rod: Commerce's preliminary weighted-average LTFV margins with respect to imports from Taiwan

Exporter/Producer	Preliminary dumping margin (percent)	Final dumping margin (percent)
Quintain Steel Co., Ltd.	32.26	Pending
Top Forever Screws Co., Ltd.	32.26	Pending
Fastenal Asia Pacific Ltd. TW Repres	32.26	Pending
QST International Corporation	32.26	Pending
Ta Chen Steel Pipe Ltd.	32.26	Pending
All others	32.26	Pending

Source: 84 FR 50382, September 25, 2019.

Table I-6
Threaded rod: Commerce's preliminary and final weighted-average LTFV margins with respect to imports from Thailand

Exporter/Producer	Preliminary dumping margin (percent)	Final dumping margin (percent)
Tycoons Worldwide Group (Thailand) Co., Ltd.	20.83	20.83
All others	20.83	20.83

Source: 84 FR 38597, August 7, 2019 and 84 FR 56162, October 21, 2019

The subject merchandise

Commerce's scope

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

> *Threaded rod covered by these investigations is carbon and alloy steel threaded rod. Steel threaded rod is certain threaded rod, bar, or studs, of carbon or alloy steel, having a solid, circular cross section of any diameter, in any straight length. Steel threaded rod is normally drawn, cold-rolled, threaded, and straightened, or it may be hot-rolled. In addition, the steel threaded rod, bar, or studs subject to these investigations are non-headed and threaded along greater than 25 percent of their total actual length. A variety of finishes or coatings, such as plain oil finish as a temporary rust protectant, zinc coating (i.e., galvanized, whether by electroplating or hot-dipping), paint, and other similar finishes and coatings, may be applied to the merchandise.*
>
> *Steel threaded rod is normally produced to American Society for Testing and Materials (ASTM) specifications ASTM A36, ASTM A193 B7/B7m, ASTM A193 B16, ASTM A307, ASTM A329 L7/L7M, ASTM A320 L43, ASTM A354 BC and BD, ASTM A449, ASTM F1554-36, ASTM F1554-55, ASTM F1554 Grade 105, American Society of Mechanical Engineers (ASME) specification ASME B18.31.3, and American Petroleum Institute (API) specification API 20E. All steel threaded rod meeting the physical description set forth above is covered by the scope of the investigation, whether or not produced according to a particular standard.*

Subject merchandise includes material matching the above description that has been finished, assembled, or packaged in a third country, including by cutting, chamfering, coating, or painting the threaded rod, by attaching the threaded rod to, or packaging it with, another product, or any other finishing, assembly, or packaging operation that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture of the threaded rod.

Carbon and alloy steel threaded rod are also included in the scope of these investigations whether or not imported attached to, or in conjunction with, other parts and accessories such as nuts and washers. If carbon and alloy steel threaded rod are imported attached to, or in conjunction with, such non-subject merchandise, only the threaded rod is included in the scope.

Excluded from the scope of the investigation are: (1) threaded rod, bar, or studs which are threaded only on one or both ends and the threading covers 25 percent or less of the total actual length; and (2) stainless steel threaded rod, defined as steel threaded rod containing, by weight, 1.2 percent or less of carbon and 10.5 percent or more of chromium, with our without other elements.

Excluded from the scope of the antidumping investigation on steel threaded rod from the People's Republic of China is any merchandise covered by the existing antidumping order on Certain Steel Threaded Rod from the People's Republic of China. See Certain Steel Threaded Rod from the People's Republic of China: Notice of Antidumping Duty Order, 74 FR 17154 (April 14, 2009).

Specifically excluded from the scope of the investigation is threaded rod that is imported as part of a package of hardware in conjunction with a ready-to-assemble piece of furniture.

Steel threaded rod is currently classifiable under subheadings 7318.15.5051, 7318.15.5056, and 7318.15.5090 of the Harmonized Tariff

Schedule of the United States (HTSUS). Subject merchandise may also enter under subheading 7318.15.2095 and 7318.19.0000 of the HTSUS. The HTSUS subheadings are provided for convenience and U.S. Customs purposes only. The written description of the scope is dispositive.[33]

Tariff treatment

Based upon the scope set forth by the Department of Commerce, information available to the Commission indicates that the merchandise subject to these proceedings is imported under the following statistical reporting numbers of the 2019 Harmonized Tariff Schedule of the United States ("HTS"): 7318.15.5051,[34] 7318.15.5056,[35] 7318.15.5090,[36] 7318.15.2095,[37] and 7318.19.0000.[38] More than 95 percent of reported imports of threaded rod are continuously threaded, and thus provided for in HTS statistical reporting numbers 7318.15.5051 and 7318.15.5056.

Threaded rod provided for in subheadings 7318.15.20 or 7318.15.50 is accorded a column-1 general duty rate of "free," while subject threaded rod provided for in subheading 7318.19.00 is accorded a column-1 general duty rate of 5.7 percent ad valorem. Eligible imports under the latter provision that are produced in India or Thailand are accorded duty-free entry under the Generalized System of Preferences upon proper importer claim. Threaded rod that is the product of China is subject to a 25-percent ad valorem additional duty under Section 301 of the Trade Act of 1974 under all 3 subheadings.[39] Appendix D contains an overview of

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[33] *Carbon and Alloy Steel Threaded Rod From Taiwan: Preliminary Affirmative Determination of Sales at Less Than Fair Value,* 84 FR 50382, September 25, 2019.

[34] Screws and bolts, whether or not with their nuts or washers; studs; other than stainless steel; continuously threaded rod; of alloy steel.

[35] Screws and bolts, whether or not with their nuts or washers; studs; other than stainless steel; continuously threaded rod; other than alloy steel.

[36] Screws and bolts, whether or not with their nuts or washers; studs; other than stainless steel; other than continuously threaded rod.

[37] Screws and bolts, whether or not with their nuts or washers; bolts and bolts and their nuts or washers entered or exported in the same shipment; having shanks or threads with a diameter of 6 mm or more; other than track bolts, structural bolts, and bent bolts; other than with round heads and hexagonal heads; other than stainless steel.

[38] Threaded rod articles other than: coach screws; other wood screws; screw hooks and screw rings; self-tapping screws; other screws and bolts, whether or note with their nuts or washers; and nuts.

[39] See USHTS 9908.33.03 for more information. USTR, *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 FR 47974, September 21, 2018.

relevant trade actions. Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

The product[40]

Description and applications

Threaded rod is generally threaded along its entire length and is produced from low-carbon, medium-carbon, or alloy steel wire rod or bar.[41] Threaded rod is primarily used in commercial construction to suspend electrical conduits; pipes for plumbing; heating, ventilation, and air-conditioning ductwork; and sprinkler systems for fire protection, among other applications. Normally, one end of the threaded rod is fastened to the ceiling and the other end is fastened to the support for suspending the conduits, pipes, ductwork, or sprinkler system. Threaded rod is also used for hanging suspended ceilings and elevated conveyor belts, and for joint restraint systems for underground piping. It is also used in structural tie downs in earthquake- and hurricane-restraint systems for roofing. Threaded rod can also be used as a headless screw in general fastener applications or for bolting together pipe joints.

The threaded rod subject to these investigations is normally produced to American Society for Testing and Materials ("ASTM") specifications ASTM A36,[42] ASTM A193 B7/B7m,

[40] Unless otherwise specified, information on the subject product and its applications is derived from the petition and/or *Steel Threaded Rod from China*, *Inv. No. 731-TA-1145 (Review),* USITC Publication 4483, August 2014, pp. I-5-6.

[41] Low carbon rod has a carbon content between 0.04 and 0.3 percent. Medium- and high-carbon rod have a carbon content between 0.3 and 1 percent. Ultra-high carbon rod has a carbon content above 1 percent. The majority of all threaded rod produced in the United States is of low-carbon content and is produced by thread rolling. Some companies have capability to thread-roll medium-carbon rod for use in applications where strength is an important factor, such as in the petroleum, machinery, or automobile industries.

[42] This is the standard specification for carbon structural steel. ASTM International, ASTM A36/A36-19," https://www.astm.org/Standards/A36.htm, (accessed August 28, 2019).

ASTM 193 B16,[43] ASTM A307,[44] ASTM A320 L7/L7M, ASTM A320 L43,[45] ASTM A354 BC and BD,[46] ASTM A449,[47] ASTM F l 554-36, ASTM F1554-55, ASTM F1554 Grade 105,[48] American Society of Mechanical Engineers ("ASME") specification ASME B18.31.3,[49] and American Petroleum Institute ("API") specification API 20E.[50]

Manufacturing processes

Threaded rod is produced from carbon and alloy steel wire rod (in the form of coils), or from steel bar for applications that require a larger diameter. Regardless of whether steel wire rod or bar is used, the production process is the same. The manufacturing process begins with the removal of surface scale (descaling). The wire rod or bar is then cold-drawn through a series of dies, each one smaller than the preceding one, to reduce the rod or bar diameter to the required size. The resulting rod is straightened and cut to the desired length, most often into 8- and 10-foot sections. Next, the rod sections are fed through a threading machine, which forms the threaded grooves along the entire length, or only part of the length, by rolling the rod between a pair of grooved dies (i.e. thread rolling).

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[43] ASTM A193 specifications generally cover alloy and stainless steel bolting intended for high temperature or high pressure service and other special purpose applications. ASTM International, "ASTM A193 / A193M – 17," https://www.astm.org/Standards/A193.htm, (accessed August 28, 2019).

[44] Standard specification for carbon steel bolts, studs, and threaded rod 60,000 PSI tensile strength. ASTM International, "A307-14e1," https://www.astm.org/Standards/A307.htm, (accessed August 28, 2019).

[45] A320 standard specifications generally apply to alloy and stainless steel bolting for lowtemperature services. ASTM International, "ASTM A320 / A320M – 18," https://www.astm.org/Standards/A320.htm, (accessed August 28, 2019).

[46] A354 standard specifications generally apply to quenched and tempered alloy steel bolts, studs, and other externally threaded fasteners. ASTM International, "ASTM A354 - 17e2," https://www.astm.org/Standards/A354.htm, (accessed August 28, 2019).

[47] A449 standard specification applies to hex cap screws, bolts and studs, steel, heat treated, 120/105/90 ksi minimum tensile strength, general use. ASTM International, "ASTM A449 – 14," https://www.astm.org/Standards/A449.htm, (accessed August 28, 2019).

[48] F1554 standard specifications apply to anchor bolts, steel, 36, 55, and 105-ksi yield strength.

[49] ASME standard specification for square, hex, heavy hex, and askew head bolts. Also covers hex, heavy hex, hex flange, lobed head, and lag screws. ASME, "B18.2.1-2012," https://www.asme.org/codes-standards/find-codes-standards/b18-2-1-square-hex-heavy-hex-askew-head-bolts-hex-heavy-hex-hex-flange-lobed-head-lag-screws, (accessed August 28, 2019).

[50] API SPEC 20E covers alloy and carbon steel bolting used in the petroleum and natural gas industries. Techstreet, "API SPEC 20E," https://www.techstreet.com/standards/api-spec-20e?product_id=1944354, (accessed August 28, 2019).

Certain threaded rod can be heat-treated[51] either before or after it is threaded. Depending on the intended end use of the final product, threaded rod can also be coated with a plain oil finish during the threading process, galvanized using either a zinc plating[52] or a hot-dip galvanizing[53] process, or coated with other finishes such as point or epoxy coatings—all processes which impart corrosion resistance.[54] Once the final coating or plating has been applied, the threaded rod is then packaged in cardboard tubes, or in bundles if it is sold in larger quantities.[55] One producer noted that threaded rod can also be sold in burlap wrap, which is preferred by certain customers in the western United States because it creates little to no dunnage.[56]

Domestic like product issues

The petitioner proposes a single domestic like product consisting of threaded rod, co-extensive with the scope in these investigations.[57] The petitioner argued that carbon and alloy threaded rod are one like product because they can be made with the same or similar machinery; the end uses are similar along a continuum, with the alloy being used in the applications that are more critical; they purchase carbon and alloy raw materials from the same

[51] Heat treatment is a process by which metal is heated (or cooled) to change its microstructure, thereby enhancing certain physical and mechanical characteristics. Heat treating is commonly used to improve strength, hardness, and corrosion resistance. Wojes, Ryan. "Here's What Happens When Metals Undergo Heat Treatment." The Balance, February 6, 2019. https://www.thebalance.com/what-happens-when-metals-undergo-heat-treatment-2340016.

[52] Zinc plating is a processed used to protect iron and steel product against corrosion. It involves the electrodeposition of a thin coating of zinc metal onto the surface of the product. This coating creates a barrier that prevents rusting on the underlying metal. Sharrett Plating, "The Zinc Plating Process," https://www.sharrettsplating.com/blog/the-zinc-plating-process/, (accessed August 28, 2019).

[53] Hot-dip galvanizing is a process by which fabricated steel is dipped into a kettle or vat containing molten zinc. During this process, the steel reacts with molten zinc to produce a tightly-bonded alloy coating that enhances the corrosion resistance abilities of the steel. American Galvanizers Association, "What is Galvanizing," https://galvanizeit.org/hot-dip-galvanizing/what-is-galvanizing, (accessed August 28, 2019).

[54] Most galvanized threaded rod is zinc electroplated. Hot-dipped galvanized finishes are less common, but are used to prevent corrosion and rust. All America Threaded Products, "Threaded 101: Finishes," https://www.aatprod.com/threaded-rod-finishes/, (accessed October 17, 2019).

[55] Conference transcript, p. 47-48 (Logan).

[56] Dunnage generally refers to packaging components such as boards, blocks, planks, metal, or plastic bracing used to support and secure products while they are being shipped and handled. Universal Packaging, "What is Dunnage," September 20, 2017, https://www.universalpackage.com/universal-package-blog/what-is-dunnage.

[57] Petitioner's postconference brief, p. 1.

suppliers; almost half of Vulcan's customers buy both carbon and alloy rod from them; and subject import prices for alloy threaded rod are often similar to Vulcan's carbon prices.[58] No other interested party commented on the definition of the domestic like product.[59]

[58] Hearing transcript, pp. 27-28 (Black).

[59] A representative from Ying Ming Industry Co., Ltd., a Taiwan producer/exporter of threaded rod, testified that the products it manufactures and exports to the United States are specialized double-ended studs used in the automobile industry, mainly for transmissions and engines, and are not covered by the scope of the investigation. Conference transcript, pp. 90-91 (Liu). Petitioner's counsel said they believe the double-ended studs probably qualify for a scope exclusion request at Commerce and the petitioner does not oppose or object to such a request. Conference transcript, pp. 103-104 (Drake). In addition, a representative of the Taipei Economic and Cultural Representative Office testified that products from Taiwan differ from the U.S. product in terms of production processes, physical characteristics, end uses, and interchangeability, and therefore imports from Taiwan should be excluded from the scope of the investigation. Conference transcript, p. 8 (Tsai).

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

U.S. market characteristics

Threaded rod has a variety of applications and uses, though its primary uses are in nonresidential construction and the oil and gas industry[1] to suspend electrical conduit, pipes, HVAC-ductwork, sprinkler systems for fire protection, and other items. In such applications, one end of the threaded rod is normally fastened to the ceiling and the other end is fastened to the support for suspending pipes, ductworks, sprinkler systems, or other items. Threaded rod may also be used for hanging suspended ceilings and elevated conveyor belts, and for joint restraint systems for underground piping. It is also used in structural tie downs in earthquake- and hurricane-restraint systems for roofing.[2] Threaded rod may also be used as headless screws in general fastener applications or for bolting pipe joints together.[3]

Threaded rod is manufactured in various diameters and lengths, and is produced primarily from carbon or alloy steel wire rod or steel bar (for larger diameters). Threaded rod can be finished with plain oil, galvanized using either zinc plating or a hot-dip galvanized process, or coated with other finishes such as paint or epoxy coatings.[4] In 2018, subject imports accounted for approximated 60 percent of apparent consumption and domestically produced threaded rod accounted for approximately 30 percent of apparent consumption.[5] Nonsubject imports accounted for approximately 10 percent of apparent consumption in 2018.

Apparent U.S. consumption of threaded rod increased during January 2016-June 2019. Overall, apparent U.S. consumption in 2018 was 25.3 percent higher than in 2016.

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[1] Hearing transcript, p. 21 (Graham). Petitioners estimated that the oil and gas industry accounts for 40 to 50 percent of the overall market. Hearing transcript, pp. 58, 74, 75 (Schagrin, Drake, Schagrin).

[2] U.S. producer and importer Bay Standard stated that building codes on the West Coast have changed to include engineered seismic tie-down systems comprised of threaded rod that is used from the anchor bolt to the top of the structure to give building support during an earthquake. Hearing transcript, p. 34 (Gross).

[3] Petition, Volume I, p. 7.

[4] Petition, Volume I, p. 7.

[5] See Part I, "Market Summary".

U.S. purchasers

The Commission received 35 usable questionnaire responses from firms that had purchased threaded rod during January 2016-June 2019.[6] Thirty responding purchasers are distributors and five are end users. In general, responding U.S. purchasers were located in Midwest and Southwest (10 purchasers each). The remaining purchases were distributed throughout the continental United States. Responding purchasers represented distributors and end users in the construction sector. The largest responding purchasers of threaded rod in 2018 were *** accounting for approximately 17 percent of reported purchases and imports, and *** accounting for approximately 16 percent. These purchasers were followed by ***, accounting for 15 percent and 12 percent of reported purchases and imports, respectively, in 2018.

Channels of distribution

The vast majority of U.S. producers sell threaded rod to distributers. Importers also sell the majority of threaded rod imported from China, India, Taiwan, and Thailand to distributors (table II-1). In contrast, the majority of threaded rod shipments from nonsubject countries were sold to end users.

[6] Of the 35 responding purchasers, 25 purchased the domestic threaded rod, 15 purchased imports of the subject merchandise from China, 13 purchased imports from India, 9 purchased imports from Taiwan, and 3 purchased imports from Thailand. Five purchasers purchased imports of threaded rod from other sources.

Table II-1
Threaded rod: U.S. producers' and importers' U.S. commercial shipments, by sources and channels of distribution, January 2016-June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Share of U.S. shipments (percent)				
U.S. producers: to Distributors	***	***	***	***	***
to End users	***	***	***	***	***
U.S. importers: China to Distributors	***	***	***	***	***
to End users	***	***	***	***	***
U.S. importers: India to Distributors	***	***	***	***	***
to End users	***	***	***	***	***
U.S. importers: Taiwan to Distributors	***	***	***	***	***
to End users	***	***	***	***	***
U.S. importers: Thailand to Distributors	***	***	***	***	***
to End users	***	***	***	***	***
U.S. importers: Subject to Distributors	***	***	***	***	***
to End users	***	***	***	***	***
U.S. importers: Nonsubject to Distributors	***	***	***	***	***
to End users	***	***	***	***	***
U.S. importers: All sources: to Distributors	***	***	***	***	***
to End users	***	***	***	***	***

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

Vulcan stated that the primary channel of distribution for its threaded rod is through large nationwide distributors for construction products.[7]

Geographic distribution

U.S. producers and importers reported selling threaded rod to all regions in the contiguous United States (table II-2). For U.S. producers, 21.8 percent of sales were within 100 miles of their production facility, nearly 69.5 percent were between 101 and 1,000 miles, and 8.8 percent were over 1,000 miles. Importers sold 31.6 percent within 100 miles of their U.S.

[7] Threaded rod is not commonly used in "do-it-yourself" projects, so big box stores are a small part of this market. Hearing transcript, p. 26 (Black).

point of shipment, 44.6 percent between 101 and 1,000 miles, and 23.7 percent over 1,000 miles.

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

Region	U.S. producers	Subject U.S. importers				
		China	India	Taiwan	Thailand	Subject sources
Northeast	7	22	17	6	***	33
Midwest	8	23	13	7	***	31
Southeast	8	22	17	6	***	33
Central Southwest	8	21	12	5	***	28
Mountains	6	17	10	5	***	21
Pacific Coast	8	19	14	6	***	27
Other[1]	4	11	7	4	***	13
All regions (except Other)	5	15	7	5	***	18
Reporting firms	9	30	26	7	2	47

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

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

Impact of section 301 tariffs and 232 tariffs

U.S. producers, importers, and purchasers were asked to report the impact of section 301 tariffs and 232 tariffs on overall demand, supply, prices, or raw material costs (tables II-3 and II-4). In both cases of 301 tariffs and 232 tariffs, most firms[8] experienced no change in demand or supply for threaded rod, but reported that the cost of raw materials for threaded rod and the price for threaded rod itself increased.

[8] U.S. producers reported mixed impact of the 232 tariffs, with two producers reporting increased demand, two producers reporting fluctuating demand, and three producers reporting no change in demand.

Table II-3
Threaded rod: Firms' responses regarding the impact of the 301 tariffs against China

Item	Number of firms reporting			
	Increase	No change	Decrease	Fluctuate
301 impact on demand -- U.S. producers	1	3	---	2
Importers	2	19	1	10
Purchasers	3	11	1	3
301 impact on supply -- U.S. producers	---	3	1	2
Importers	---	21	2	8
Purchasers	3	10	1	4
301 impact on prices -- U.S. producers	4	2	---	---
Importers	18	6	---	8
Purchasers	13	4	---	2
301 impact on raw material cost -- U.S. producers	5	1	---	---
Importers	13	7	---	10
Purchasers	11	5	---	2

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

Table II-4
Threaded rod: Firms' responses regarding the impact of the 232 tariffs on steel and aluminum imports

Item	Number of firms reporting			
	Increase	No change	Decrease	Fluctuate
232 impact on demand -- U.S. producers	2	3	---	2
Importers	4	21	2	6
Purchasers	5	13	---	4
232 impact on supply -- U.S. producers	---	4	1	2
Importers	1	20	1	8
Purchasers	1	15	1	5
232 impact on prices -- U.S. producers	5	1	---	1
Importers	18	6	1	6
Purchasers	15	6	---	2
232 impact on raw material cost -- U.S. producers	7	---	---	---
Importers	16	6	---	6
Purchasers	11	8	---	3

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

Supply and demand considerations

U.S. supply

Table II-5 provides a summary of the supply factors regarding threaded rod from U.S. producers and from subject countries.

Table II-5
Threaded rod: Supply factors that affect the ability to increase shipments to the U.S. market

Item	2016	2018	2016	2018	2016	2018	Shipments by market in 2018 (percent)		Able to shift to alternate products
	Capacity (1,000 pounds)		Capacity utilization (percent)		Inventories as a ratio to total shipments (percent)		Home market shipments	Exports to non-U.S. markets	No. of firms reporting "yes"
United States	275,234	253,520	48.7	58.0	***	***	***	***	6 of 9
China	***	***	***	***	***	***	***	***	0 of 0
India	***	***	***	***	***	***	***	***	1 of 4
Taiwan	***	***	***	***	***	***	***	***	*** of 1
Thailand	***	***	***	***	***	***	***	***	0 of 0

Note.--Responding U.S. producers accounted for virtually all of U.S. production of threaded rod in 2018. Responding foreign producer/exporter firms accounted for more than half of U.S. imports of threaded rod from India during 2018. Responding foreign producer/exporter firms accounted for less than 25 percent of U.S. imports of threaded rod from Taiwan during 2018. No questionnaire responses were received from Chinese or Thai foreign producers. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Part I, "Summary Data and Data Sources" and Part VII.

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

Domestic production

Based on available information, U.S. producers of threaded rod have the ability to respond to changes in demand with large changes in the quantity of shipments of U.S.-produced threaded rod to the U.S. market. The main contributing factors to this level of responsiveness of supply are the availability of unused capacity, some inventories, and the ability to switch production from other products to threaded rod. A limited amount of non-U.S. exports may mitigate U.S. producers' ability to respond to changes in demand with shipments from these other markets.

Domestic capacity to produce threaded rod decreased by 7.9 percent from 2016 to 2018 while production increased by 9.9 percent over the same period (table II-5). Domestic capacity utilization increased by 9.4 percentage points during this time. This moderate level of capacity utilization suggests that U.S. producers may have the ability to increase production of threaded

rod in response to an increase in prices. U.S. producers' inventories decreased slightly during 2016-18. These inventory levels indicate that U.S. producers have the ability to respond to changes in demand with quantity shipped from inventories. U.S. producers exported *** percent of their total shipments of threaded rod in 2018, suggesting that they have little, if any, ability to divert shipments to the U.S. market away from foreign markets in response to price changes. The majority of responding U.S. producers stated that they could switch production from other products to threaded rod. U.S. producers reportedly can produce a variety of products, including but not limited to anchor bolts, u-bolts, and headed bolts. U.S. producers reported that the factors affecting their ability to shift production from alternate products include time and labor costs, and lack of a skilled work force.

Subject imports from China

No Chinese producers submitted questionnaires during the preliminary or final phases of the investigations. According to official trade statistics reported by China, exports to the United States accounted for approximately 20 percent of China's exports during 2016-2018, fluctuating slightly over the period. Please see Part VII for additional information.

Subject imports from India

Based on the available information, Indian producers of threaded rod have a moderate ability to respond to changes in demand with changes in the quantity of shipments of threaded rod to the U.S. market. The main contributing factors to this are moderately high capacity utilization rates, the availability of some inventories, and the low percentage of exports that Indian producers send to markets other than the United States, and a limited ability to switch production from other products to threaded rod.

Capacity utilization for responding Indian producers decreased as their total production capacity increased and production decreased during 2016-18. This moderate level of capacity utilization suggests that Indian producers may have some ability to increase production of threaded rod in response to an increase in prices.

Indian producers' inventories increased *** during 2016-18. These inventory levels suggest that Indian producers have a moderately low ability to respond to changes in demand with quantities of threaded rod shipped from inventories. As a share of their total shipments, Indian producers shipped *** percent of their product to their home market and export markets other than the United States in 2018. This indicates that Indian producers have a low ability to divert shipments to the U.S. market in response to increased prices. The majority of responding Indian producers indicated that they did not produce any other products on the same machinery or equipment as threaded wire rod, which would limit Indian

producers' ability to respond to changes in the price of threaded rod by transferring production from alternate products. The Indian producer that did report being able to produce other products on the same machinery as threaded rod reported producing tie rods, anchor bolts, and truss rods.

Subject imports from Taiwan

Based on available information, producers of threaded rod from Taiwan have the ability to respond to changes in demand with small changes in the quantity of shipments of threaded rod to the U.S. market. Factors mitigating responsiveness of supply include limited availability of unused capacity or inventories, and an inability to shift production to or from alternate products.[9]

Subject imports from Thailand

No Thai producers submitted questionnaires during the preliminary nor final phases of the investigations. According to official trade statistics reported by Thailand, exports to the United States accounted for approximately 20 percent of Thailand's exports of threaded rod during 2016-2018, increasing slightly over the period. Please see Part VII for additional information.

Imports from nonsubject sources

Nonsubject imports accounted for 12.4 percent of total U.S. imports in 2018. The largest sources of nonsubject imports during January 2016-June 2019 were Canada, Germany, Japan, Mexico, and South Korea. Combined, these countries accounted for approximately 70 percent of nonsubject imports in 2018.

Supply constraints

The majority of U.S. producers (8 of 9), importers (44 of 52), and purchasers (31 of 35) did not report any supply constraints. U.S. producer *** reported that import uncertainty

[9] Staff received questionnaires from four Taiwan producers during the preliminary phase, including *** which also submitted a questionnaire during the final phase. Based on data submitted in these four questionnaires, Staff found that producers of threaded rod in Taiwan have a moderate ability to respond to changes in demand with changes in the quantity of threaded rod shipped to the U.S. market. The main contributing factors to this are the availability of some unused production capacity, some inventories, and the high percentage of exports that producers in Taiwan send to markets other than the United States. A mitigating factor to this level of responsiveness is a limited ability to shift production from alternate products to threaded rod.

has left purchasers "scrambling" for threaded rod, and that it has refused to provide quotes for new customers because it is already too busy. Of the eight importers that faced supply shortages, three cited "penalty" tariffs, spikes in steel prices, and the preliminary threaded rod antidumping and countervailing duty (AD/CVD) investigations. Two purchasers mentioned that Vulcan was unable to supply them with domestic product, and one purchaser stated that PrimeSource no longer sells threaded rod to the firm due to ***. Importer *** reported that "convincing prospective suppliers to invest in the capital equipment and engineering technology that is required to produce a quality product for a low value, low-skilled labor and high-volume commodity is difficult."

Most purchasers (27 of 32) reported that the availability of U.S.-produced threaded rod had not changed since 2016. Of the five purchasers that did report a change, *** reported that due to a lack of supply from U.S. producer Vulcan, it has begun to import Chinese threaded rod; *** reported that lead times have decreased due to a downturn in the energy sector, and *** reported that there are fewer U.S. manufacturers. Three purchasers reported a change in supply from subject countries, citing reduced availability of threaded rod since the beginning of the AD/CVD investigations, and increased availability from subject countries.

Five purchasers reported that certain types of threaded rod are only available from certain sources. Purchasers *** reported that smaller diameter threaded rod is not readily available from domestic sources, and purchaser *** reported that certain products (***) are only available from China in the large quantities the firm requires.

New suppliers

Most responding purchasers reported that there were no new suppliers in the threaded rod market. Four of 33 purchasers indicated that new suppliers entered the U.S. market since January 1, 2016. Two purchasers cited G.B.M.T. Structural Steel from the UAE, and one purchaser cited multiple new suppliers including Lightning Bold & Supply, Threading & Sealing Tech., Cyclone Bolt and Gasket, and Heiser Stud Manufacturing.

U.S. demand

Based on available information, the overall demand for threaded rod is likely to experience relatively small changes in response to changes in price. The main contributing factors are the limited availability substitutes and the relatively small cost share of threaded rod

in the most common end-use products, though this varies considerably across end-use and the type of end product (e.g., sprinkler system vs. commercial building).

End uses and cost share

U.S. demand for threaded rod depends on the demand for U.S.-produced downstream products. Reported end uses include commercial construction; hanging of pipe, sprinkler systems, conduit, electrical, lights, struts, and HVAC units; joint restraint systems for underground piping; tie downs and fastening; concrete anchors; and general framing and anchoring. [10]

Of the identified end uses, threaded rod accounted for a highly variable share of the cost of the end-use products. Threaded rod accounts for a large share of the cost of duct hangars, brackets, bolts, and anchors, but accounts for a much smaller share of a construction or plumbing project. Some reported end uses and cost shares were as follows:

- Duct hangers; plumbing or electrical component supports (70 to 95 percent)
- Bracing brackets, usually assembled with nuts and washers (95 percent)
- Assemblies or kits (80 to 85 percent)
- Preassembled anchor bolts and anchor rods (70 to 85 percent)
- All thread studs (75 percent)
- Structural tie downs and other fastening applications (50 to 70 percent)
- Custom threaded studs (25 to 50 percent)
- Pipe, pipe hanger, and duct works in plumbing or construction projects (1 to 5 percent)
- Ball valve manufacturing (1 percent)

Generally, alloy steel threaded rod is used for applications that are under pressure or heat such as flange bolts in refineries and pipelines, while carbon steel threaded rod is generally used in water or air lines, and has lower load capacities.[11] Petitioner alleged that alloy steel threaded rod can be used in place of carbon threaded rod.[12]

[10] Petition, Volume I, p. 7.

[11] Hearing transcript, p. 67, 70 (Black, Schagrin). Petitioner stated that while the products used in the oil and gas sector are generally a higher grade than products used in construction, threaded rod is made to common ASTM and/or API standards regardless of application. Hearing transcript, p. 73 (Schagrin).

[12] Hearing transcript, p. 88 (Schagrin).

Business cycles

Most U.S. producers (7 of 9), importers (35 of 51), and purchasers (29 of 33) indicated that the market was not subject to business cycles or conditions of competition. Firms indicating that the threaded rod market was subject to business cycles specifically cited the seasonality of construction work and seasonal maintenance outages in the petro chemical and refining markets.

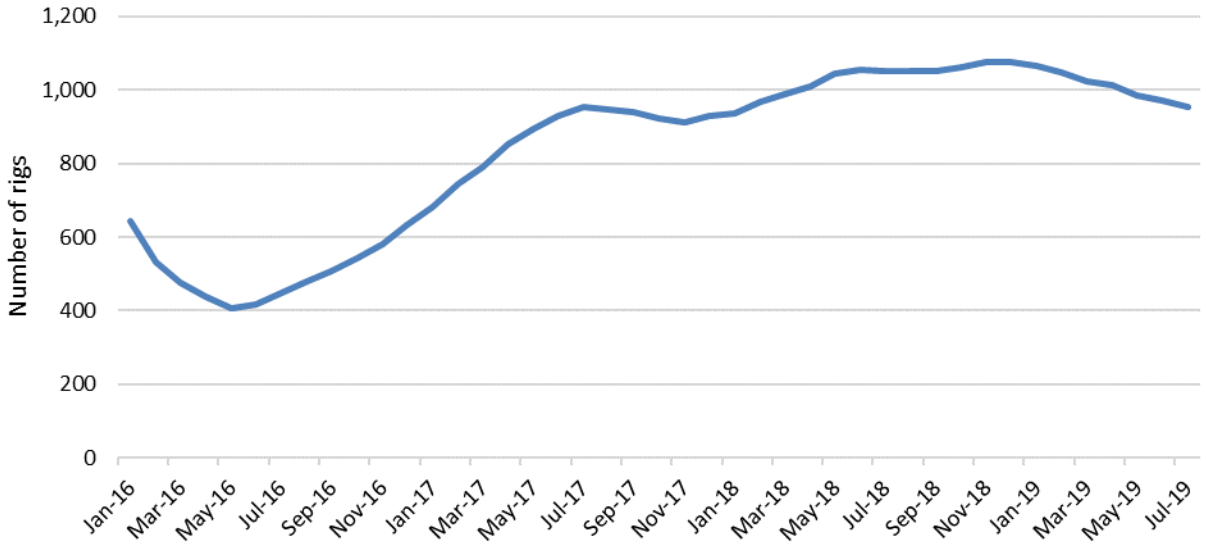
Two firms reported that the threaded rod market is subject to specific conditions of competition. U.S. importer *** reported that the market is very competitive and that steel prices, trucking and shipping costs, and now AD/CVD duties can slow business. U.S. purchaser *** reported that it is subject to cycles in the oil and gas markets.

One producer, nine importers, and five purchasers reported that business cycles or conditions of competition had changed since 2016. Six of these firms cited the decline in oil and gas markets, and three firms cited increased competition and demand for imports. One importer reported that there is more regulation in the industry for safety and environmental impacts, and another importer reported that U.S. producers raised prices after tariffs led to a shift to more domestic purchases.

Demand trends

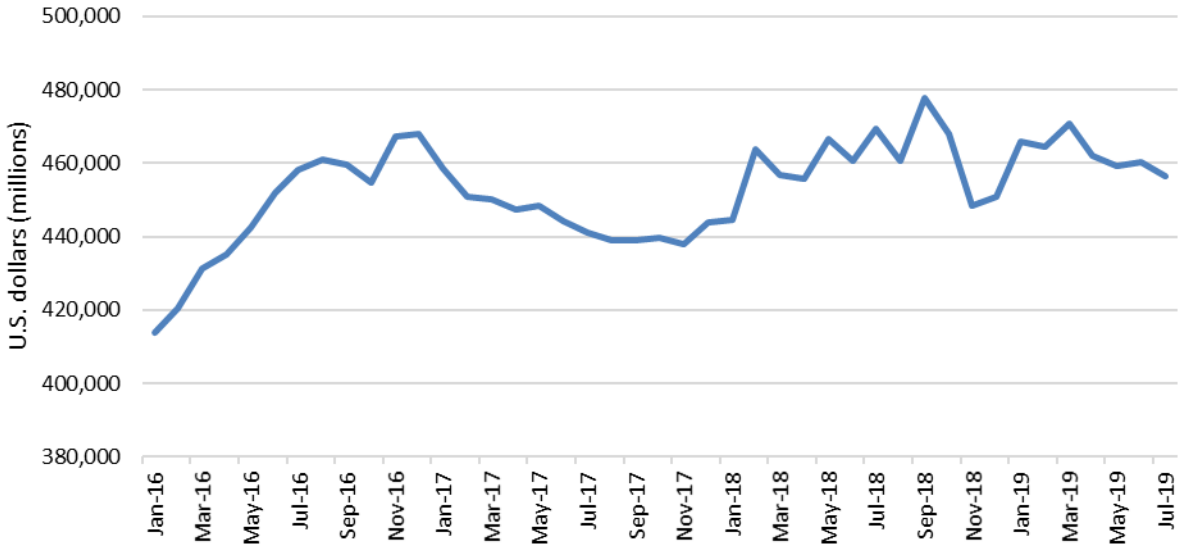
Overall demand for threaded rod depends on the demand for its end uses, of which most are connected to oil and gas extraction and nonresidential and commercial construction. Demand in both oil and gas extraction and construction sectors has increased since January 2016. Crude oil and natural gas rigs in operation increased by 48 percent between January 2016 and July 2019 (figure II-1). Private nonresidential construction spending increased by 10.3 percent between January 2016 and July 2019 (see figure II-2).

Figure II-1
Crude oil and natural gas production: Total crude oil and natural gas rotary rigs in operation, monthly, January 2016-July 2019



Source: Energy Information A, Table 5.1. Crude Oil and natural Gas Drilling Activity Measures, https://www.eia.gov/totalenergy/data/browser/?tbl=T05.01#/?f=M&start=201601&end=201907&charted=5-6-7, Accessed September 25, 2019.

Figure II-2
Construction spending: Private nonresidential construction spending (seasonally adjusted, annual rate), monthly, January 2016-July 2019



Source: U.S. Census Bureau at https://www.census.gov/construction/c30/c30index.html, retrieved September 25, 2019.

Firms most frequently reported an increase in U.S. demand for threaded rod since January 1, 2016 (table II-6). U.S. producers and importers most frequently reported fluctuating

demand outside of the United States, while most purchasers reported that demand outside that United States was unchanged.

When asked if demand for end uses of threaded rod had changed, purchasers' responses were mixed. Five purchasers each reported increasing and constant demand, four purchasers reported fluctuating demand, and three purchasers reported decreased demand. Half of responding purchasers (9 of 18) reported that these changes in demand had impacted demand for threaded rod, citing increased overall economic growth and the demand for threaded rod in the oil and gas industry.

Table II-6
Threaded rod: Firms' responses regarding U.S. demand and demand outside the United States

Item	Number of firms reporting			
	Increase	No change	Decrease	Fluctuate
Demand inside the United States:				
U.S. producers	5	2	---	2
Importers	20	10	6	14
Purchasers	11	10	3	8
Demand outside the United States:				
U.S. producers	1	---	---	2
Importers	5	8	2	11
Purchasers	3	9	---	3
Demand for end use product(s):				
Purchasers	5	5	3	4

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

Substitute products

Substitutes for threaded rod are very limited. Virtually all U.S. producers, importers, and purchasers reported that there are no substitutes for threaded rod. Of the three firms that reported substitute products, U.S. producer *** reported that wire or chain could be used as a substitute for threaded rod in hanging electrical conduit and pipe; importer *** reported that bolts could be used as substitutes in wood construction; and U.S. purchaser *** reported that other restraint materials such as a lug-style restraint or retainer glands could serve as a substitute.

Substitutability issues

The degree of substitution between domestic and imported threaded rod depends upon such factors as relative prices, quality (e.g., grade standards, defect rates, etc.), and conditions of sale (e.g., price discounts/rebates, lead times between order and delivery dates, reliability of supply, product services, etc.). Based on available data, staff believes that there is high degree

of substitutability between domestically produced threaded rod and threaded rod imported from subject sources.

Lead times

Threaded rod is primarily sold from inventory. U.S. producers reported that 79.9 percent of their commercial shipments were sold from inventory and importers reported that 64.9 percent of their commercial shipments were sold from inventory, with lead times averaging 3 days and 19 days,[13] respectively. The remaining 20.1 percent of U.S. producers' commercial shipments were produced-to-order, with lead times averaging 21 days. Most of importers' remaining commercial shipments (32.1 percent) were produced-to-order with lead times averaging 100 days, and the last 3.0 percent were sold from foreign inventories averaging 73 days.

Knowledge of country sources

Twenty-nine purchasers indicated they had marketing/pricing knowledge of domestic product, 14 of Chinese product, 19 of Indian product, 7 of Taiwan product, and 2 of Thai product. Six purchasers reported marketing/pricing knowledge of nonsubject countries including the UAE (reported by two purchasers), Germany, Mexico, and the United Kingdom (one purchaser each).

As shown in table II-7, most purchasers and their customers never make purchasing decisions based on the producer, and most purchasers and their customers only sometimes or never make purchasing decisions based on the country-of-origin. Three purchasers, including ***, reported that they always or usually make their purchasing decisions based on the producer because they rely on the approved manufacturers lists of their firms or their customers. Two purchasers reported a preference for U.S.-produced threaded rod when available, and purchaser *** reported that it takes tariffs into account when making its purchasing decisions.

[13] U.S. importers *** reported lead times ranging from 120-180 days for their commercial shipments from inventories. All other responding importers reported lead times within the range of 1 to 10 days.

Table II-7
Threaded rod: Purchasing decisions based on producer and country of origin

Decision	Always	Usually	Sometimes	Never
Purchases based on producer:				
Purchaser's decision	4	7	7	18
Purchaser's customer's decision	1	4	5	18
Purchases based on country of origin:				
Purchaser's decision	1	7	11	12
Purchaser's customer's decision	---	2	12	14

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

Factors affecting purchasing decisions

The most often cited top three factors firms consider in their purchasing decisions for threaded rod were price (30 firms), quality (21 firms), and availability of supply (18 firms) as shown in table II-8. Similarly, price was the most frequently cited first-most important factor (cited by 14 firms), followed by quality (11 firms); availability of supply was the most frequently reported second-most important factor (8 firms); and price was the most frequently reported third-most important factor (9 firms).

Table II-8
Threaded rod: Ranking of factors used in purchasing decisions as reported by U.S. purchasers, by factor

Item	1st	2nd	3rd	Total
	Number of firms (number)			
Price	14	7	9	30
Quality	11	5	6	21
Availability of supply	3	8	7	18
Delivery time	1	4	5	10
Reliability or consistency	1	3	2	4
All other factors	5	6	2	NA

Note:-Other factors include long-standing relationships with a supplier (5 purchasers), compliance with ISO and other certifications and country-of-origin (4 each), approved manufacturers' lists/other market approvals and product range (3 each), packaging and location (2 each), and extension of credit (1).

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

Twelve purchasers specifically highlighted steel industry standards such as ASTM and ANSI requirements as a measure of quality for threaded rod. Purchasers also identified packaging, thread and nut fitment, coating quality, efficient storability, appearance, ability to thread the rod, a lack of flattened threads, and straightness of the threaded rod as measures of quality.

More than half of responding purchasers (18 of 35), ***, reported that they always or usually purchase the lowest price product. However, the remaining 17 purchasers reported that they only sometimes or never purchase the lowest price product.

Importance of specified purchase factors

Purchasers were asked to rate the importance of 16 factors in their purchasing decisions (table II-9). The factors rated as very important by more than half of responding purchasers were availability (33 purchasers), quality meets industry standards (32), reliability of supply (30), product consistency (29), price (28), delivery time (25), and delivery terms (18).

Table II-9
Threaded rod: Importance of purchase factors, as reported by U.S. purchasers, by factor

Factor	Number of firms reporting		
	Very	Somewhat	Not
Availability	33	2	---
Delivery terms	18	14	3
Delivery time	25	10	---
Discounts offered	7	14	14
Minimum quantity requirements	8	14	13
Packaging	11	15	8
Payment terms	11	17	7
Price	28	7	---
Product consistency	29	4	1
Product range	8	21	6
Quality meets industry standards	32	4	---
Quality exceeds industry standards	10	19	6
Reliability of supply	30	5	---
Steel type (alloy vs non-alloy)	13	15	6
Technical support/service	9	16	10
U.S. transportation costs	11	16	8

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

Supplier certification

Nineteen of 35 responding purchasers do not require their suppliers to become certified or qualified to sell threaded rod to their firm. Of the purchasers that do require supplier certification, most firms reported that it takes a month or less to qualify a new supplier. U.S. producer and importer Bay Standard stated that certifications for tie-down systems in construction are extremely important, and for that reason maintains traceability through production, inventory, and delivery.[14]

[14] Hearing transcript, p. 102 (Gross).

Five purchasers (***) reported longer times to certify a supplier, ranging from 3 months to over a year. *** reported that its certification process for *** involves extensive quality audits of the entire supply chain, *** from suppliers that have not gone through the approval process. Other purchasers such as *** require longer certification processes that involve business cases, manufacturing facility inspections, and sample testing. Petitioner stated that these certifications are almost all producer "self-certifications" with mill test reports and that there is very little third-party testing of threaded rod.[15]

Four of 35 purchasers reported that a supplier had failed in its attempt to qualify threaded rod, or had lost its approved status since 2016. Purchaser *** reported that it is not aware of any U.S. producers that have obtained necessary certifications for certain types of threaded rod. Purchaser *** reported that Nashant Steel Industries (India) did not successfully deliver its trial order on time, and purchaser *** reported that Daksh (India) had failed to meet its schedule requirements.

Changes in purchasing patterns

Purchasers were asked about changes in their purchasing patterns from different sources since 2016 (table II-10). Many purchasers reported that their purchases had increased due to an increase in demand for threaded rod. While most purchasers reported increasing or constant purchases of U.S. product, purchaser *** reported decreased purchases of U.S.-produced threaded rod due to pricing, and purchaser *** reported that its purchases of U.S. product decreased because its supplier, ***, sold its production equipment. Purchaser *** reported that its purchases of threaded rod imported from China decreased because more customers have prohibited Chinese material, and purchaser *** reported that its purchases of threaded rod imported from Taiwan decreased as it shifted some of its purchases to Indian produced threaded rod which has become more accepted in the U.S. market.

[15] Hearing transcript, p. 104 (Schagrin).

Table II-10
Threaded rod: Changes in purchase patterns from U.S., subject, and nonsubject countries

Source of purchases	Did not purchase	Decreased	Increased	Constant	Fluctuated
United States	5	4	7	9	6
China	13	2	4	3	3
India	9	2	8	5	1
Taiwan	15	2	2	2	1
Thailand	17	---	---	2	1
Nonsubject sources	13	---	1	2	---
Sources unknown	12	---	2	5	5

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

Ten of 35 responding purchasers reported that they had changed suppliers since January 1, 2016. Specifically, firms dropped or reduced purchases from All-American when it sold its equipment and several firms reported dropping Daksh (India) and other suppliers due to declining service, inferior quality, and a failure to deliver shipments on time. Purchaser *** reported switching its sourcing for high-strength grades of threaded rod from domestic producers, and purchaser *** reported adding AADI (India) for faster delivery and a steady supply of threaded rod.

Importance of purchasing domestic product

Seventeen of 29 purchasers reported that at least 95 percent of their purchases did not require purchasing U.S.-produced product. Ten purchasers reported that domestic product was required by law (for 0.2 to 25 percent of their purchases), 12 purchasers reported it was required by their customers (for 0.3 to 87 percent of their purchases), and 4 purchasers reported other preferences for domestic product, such as an internal company buying preference.

Fifteen purchasers reported a preference for U.S.-produced threaded rod, and two purchasers (***) reported a preference for threaded rod from Taiwan. Purchasers *** reported that some of their customers specifically request that their threaded rod is not from China.

Comparisons of domestic products, subject imports, and nonsubject imports

Purchasers were asked a number of questions comparing threaded rod produced in the United States, subject countries, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same factors (table II-11) for which they were asked to rate the importance.

Most purchasers reported that U.S. and subject threaded rod were comparable on all factors with the exception of delivery time (for which most purchasers reported U.S. product to be superior or comparable) and price (for which most purchasers reported U.S. product to be inferior). Both delivery time and price were ranked as very important purchasing factors (see table II-9). Most purchasers reported that U.S.-produced threaded rod and threaded rod from nonsubject countries were comparable on all factors with the exception of availability (for which U.S.-produced threaded rod was ranked comparable or inferior) and price (for which U.S. produced threaded rod was superior or comparable).

Table II-11
Threaded rod: Purchasers' comparisons between U.S.-produced and imported product

Factor	Number of firms reporting								
	United States vs. China			United States vs. India			United States vs. Taiwan		
	S	C	I	S	C	I	S	C	I
Availability	4	7	4	5	9	5	2	6	3
Delivery terms	2	12	1	6	9	5	---	9	2
Delivery time	6	6	3	9	4	6	4	4	3
Discounts offered	3	10	2	2	13	4	---	11	---
Minimum quantity requirements	4	7	4	5	10	3	4	4	3
Packaging	1	11	3	2	14	3	---	9	2
Payment terms	---	12	2	1	16	2	---	11	---
Price[1]	---	5	10	3	4	12	1	3	7
Product consistency	---	15	---	2	16	1	---	11	---
Product range	4	9	2	5	11	3	3	8	---
Quality meets industry standards	---	14	1	2	16	1	---	11	---
Quality exceeds industry standards	---	15	---	3	13	1	---	11	---
Reliability of supply	2	11	2	4	12	3	1	9	1
Technical support/service	3	12	---	7	9	2	---	10	1
U.S. transportation costs	4	8	3	6	7	5	2	5	4

Factor	United States vs. Thailand			United States vs. Nonsubject			China vs. India		
	S	C	I	S	C	I	S	C	I
Availability	1	2	1	1	2	2	4	5	1
Delivery terms	1	3	1	1	3	---	4	5	1
Delivery time	1	1	1	1	2	1	4	5	1
Discounts offered	---	4	---	---	4	---	2	8	---
Minimum quantity requirements	1	3	---	---	4	---	3	7	---
Packaging	---	4	---	---	4	---	3	7	---
Payment terms	---	4	---	---	3	1	2	8	---
Price[1]	---	1	3	2	2	---	2	7	1
Product consistency	---	4	---	1	3	---	3	7	---
Product range	---	4	---	---	4	---	3	7	---
Quality meets industry standards	---	4	---	---	4	---	3	7	---
Quality exceeds industry standards	---	4	---	---	4	---	3	7	---
Reliability of supply	1	2	1	---	4	---	3	7	---
Technical support/service	1	3	---	---	4	---	3	7	---
U.S. transportation costs	---	3	1	---	4	---	3	7	---

Table continued on next page.

Table II-11--Continued
Threaded rod: Purchasers' comparisons between U.S.-produced and imported product

Factor	Number of firms reporting								
	China vs. Taiwan			China vs. Thailand			China vs. Nonsubject		
	S	C	I	S	C	I	S	C	I
Availability	---	7	1	---	1	1	1	2	---
Delivery terms	---	7	1	---	1	1	---	3	---
Delivery time	---	7	1	---	1	1	1	2	---
Discounts offered	---	8	---	---	2	---	1	2	---
Minimum quantity requirements	---	8	---	---	2	---	1	2	---
Packaging	---	8	---	---	2	---	1	2	---
Payment terms	---	8	---	---	2	---	1	2	---
Price[1]	1	6	1	---	1	1	1	2	---
Product consistency	---	8	---	---	2	---	1	2	---
Product range	---	8	---	---	2	---	1	2	---
Quality meets industry standards	---	8	---	---	2	---	---	3	---
Quality exceeds industry standards	---	8	---	---	2	---	---	3	---
Reliability of supply	---	7	1	---	1	1	1	2	---
Technical support/service	---	8	---	---	2	---	---	3	---
U.S. transportation costs	---	8	---	---	2	---	---	3	---
Factor	**India vs. Taiwan**			**India vs. Thailand**			**India vs. Nonsubject**		
	S	**C**	**I**	**S**	**C**	**I**	**S**	**C**	**I**
Availability	1	8	1	---	3	---	---	2	1
Delivery terms	1	8	1	1	2	---	---	2	1
Delivery time	2	5	3	1	1	1	---	2	1
Discounts offered	---	8	1	---	3	---	---	3	---
Minimum quantity requirements	---	9	1	---	3	---	---	2	1
Packaging	---	7	3	---	3	---	---	2	1
Payment terms	---	9	1	---	3	---	---	3	---
Price[1]	4	5	1	2	1	---	---	3	---
Product consistency	---	9	1	---	3	---	---	2	1
Product range	2	7	1	---	3	---	---	2	1
Quality meets industry standards	---	9	1	---	3	---	---	2	1
Quality exceeds industry standards	---	9	1	---	3	---	---	2	1
Reliability of supply	1	7	2	1	2	---	---	2	1
Technical support/service	---	8	2	---	3	---	---	2	1
U.S. transportation costs	---	9	1	---	3	---	---	2	1

Table continued on next page.

Table II-11--Continued
Threaded rod: Purchasers' comparisons between U.S.-produced and imported product

Factor	Number of firms reporting								
	Taiwan vs. Thailand			Taiwan vs. Nonsubject			Thailand vs. Nonsubject		
	S	C	I	S	C	I	S	C	I
Availability	---	3	---	---	2	---	---	1	---
Delivery terms	---	3	---	---	2	---	---	1	---
Delivery time	---	3	---	---	2	---	---	1	---
Discounts offered	---	3	---	---	2	---	---	1	---
Minimum quantity requirements	---	3	---	---	2	---	---	1	---
Packaging	---	3	---	---	2	---	---	1	---
Payment terms	---	3	---	---	2	---	---	1	---
Price[1]	---	3	---	---	2	---	---	1	---
Product consistency	---	3	---	---	2	---	---	1	---
Product range	---	3	---	---	2	---	---	1	---
Quality meets industry standards	---	3	---	---	2	---	---	1	---
Quality exceeds industry standards	---	3	---	---	2	---	---	1	---
Reliability of supply	---	3	---	---	2	---	---	1	---
Technical support/service	---	3	---	---	2	---	---	1	---
U.S. transportation costs	---	3	---	---	2	---	---	1	---

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

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.

Comparison of U.S.-produced and imported threaded rod

In order to determine whether U.S.-produced threaded rod can generally be used in the same applications as imports from China, India, Taiwan, and Thailand, 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, most firms reported that U.S.-produced threaded rod and threaded rod from subject countries can always or frequently be used interchangeably. Most U.S. purchasers reported that domestically produced threaded rod and threaded rod from subject countries can be always used interchangeably. Purchaser *** reported that if threaded rod is produced to the same ASTM specifications, it should be functionally interchangeable regardless of country of origin, although approved manufacturing lists may restrict interchangeable use of threaded rod.

Table II-12
Threaded rod: Interchangeability between threaded rod produced in the United States and in other countries, by country pair

Country pair	U.S. producers				U.S. importers				U.S. purchasers			
	A	F	S	N	A	F	S	N	A	F	S	N
United States vs. China	3	2	3	---	15	11	8	---	15	4	5	---
United States vs. India	2	2	1	---	14	10	7	---	16	5	5	---
United States vs. Taiwan	2	1	1	---	8	7	3	---	10	3	4	---
United States vs. Thailand	2	1	1	---	7	7	3	---	8	1	4	---
China vs. India	2	2	1	---	12	3	6	1	14	5	1	---
China vs. Taiwan	2	2	1	---	8	3	3	1	10	4	1	---
China vs. Thailand	2	2	1	---	8	2	3	1	8	2	1	---
India vs. Taiwan	2	1	1	---	8	3	4	---	10	4	1	---
India vs. Thailand	2	1	1	---	8	2	4	---	8	2	1	---
Taiwan vs. Thailand	2	1	1	---	9	2	3	---	8	2	1	---
United States vs. Other	2	---	1	---	6	7	7	---	8	2	3	---
China vs. Other	2	1	1	---	8	3	6	---	9	3	1	---
India vs. Other	2	---	1	---	8	2	5	---	8	3	1	---
Taiwan vs. Other	2	---	1	---	8	2	5	---	8	3	1	---
Thailand vs. Other	2	---	1	---	8	1	5	---	8	2	1	---

Note.-- A=Always, F=Frequently, S=Sometimes, N=Never.

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

Firms reporting that U.S.-produced threaded rod is only sometimes or never interchangeable cited different origin demands, certification, quality requirements, volume, and lead time required. U.S. importer *** reported that it is unable to source some *** from U.S. producers because they are not available domestically, and U.S. importer *** reported that it sources primarily alloy steel threaded rod from China, carbon steel threaded rod from Taiwan and Thailand, and hot dipped galvanized from India.

As can be seen from table II-13, 18 responding purchasers reported that domestically produced product always met minimum quality specifications. Most responding purchasers reported that they did not know if threaded rod from China, Taiwan, or Thailand met minimum quality specifications. Sixteen purchasers reported that product from India always or usually met minimum quality standards.

Table II-13
Threaded rod: Ability to meet minimum quality specifications, by source

Source of purchases	Always	Usually	Sometimes	Rarely or never	Don't Know
United States	18	8	---	---	8
China	10	6	---	---	17
India	9	7	1	---	14
Taiwan	3	6	---	---	23
Thailand	2	1	---	---	26
Nonsubject sources	---	2	---	---	18

Note:--Purchasers were asked how often domestically produced or imported threaded rod meets minimum quality specifications for their own or their customers' uses.

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

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of threaded rod from the United States, subject, or nonsubject countries. As seen in table II-14, most U.S. purchasers reported that factors other than price were never significant. Most U.S. producers and importers reported that factors other than price were only sometimes or never significant.

Table II-14
Threaded rod: Significance of differences other than price between threaded rod produced in the United States and in other countries, by country pair

	U.S. producers				U.S. importers				U.S. purchasers			
Country pair	A	F	S	N	A	F	S	N	A	F	S	N
United States vs. China	1	1	4	3	4	8	11	10	3	5	6	7
United States vs. India	---	1	3	2	2	3	16	9	6	3	6	8
United States vs. Taiwan	---	1	2	2	---	2	8	6	1	4	4	7
United States vs. Thailand	---	1	2	2	---	1	7	5	2	2	2	6
China vs. India	---	1	1	2	1	2	8	7	3	3	3	7
China vs. Taiwan	---	1	1	2	---	1	6	6	1	4	1	7
China vs. Thailand	---	1	1	2	---	1	3	7	---	2	---	7
India vs. Taiwan	---	1	1	2	---	1	6	6	1	4	1	7
India vs. Thailand	---	1	1	2	---	1	4	6	---	2	---	7
Taiwan vs. Thailand	---	1	1	2	---	1	3	7	1	2	---	7
United States vs. Other	---	1	1	2	---	4	10	5	---	1	2	7
China vs. Other	---	1	---	2	---	4	6	6	---	1	2	6
India vs. Other	---	1	---	2	---	2	7	6	---	1	2	6
Taiwan vs. Other	---	1	---	2	---	1	5	7	---	---	2	6
Thailand vs. Other	---	1	---	2	---	1	4	7	---	---	---	7

Note.--A = Always, F = Frequently, S = Sometimes, N = Never.

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

Elasticity estimates

This section discusses elasticity estimates. Parties did not comment on these estimates during the hearing or in their briefs.

U.S. supply elasticity

The domestic supply elasticity[16] for threaded rod measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of threaded rod. 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 threaded rod. Analysis of these factors above indicates that the U.S. industry has the ability to greatly increase or decrease shipments to the U.S. market; an estimate in the range of 6 to 8 is suggested.

U.S. demand elasticity

The U.S. demand elasticity for threaded rod measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of threaded rod. 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 threaded rod in the production of any downstream products. Based on the available information, the aggregate demand for threaded rod is likely to be inelastic; a range of -0.5 to -1 is suggested.

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.[17] Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/ discounts/ promotions, etc.). Based on available information, the elasticity of substitution between U.S.-produced threaded rod and imported threaded rod is likely to be in the range of 4 to 6.

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[16] A supply function is not defined in the case of a non-competitive market.

[17] 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 and pricing of imports of the subject merchandise is presented in *Part IV* and *Part V*. Information on the other factors specified is presented in this section and/or *Part VI* and (except as noted) is based on the questionnaire responses of nine firms that accounted for the vast majority of U.S. production of threaded rod during 2018.

U.S. producers

The Commission issued a U.S. producer questionnaire to ten firms based on information contained in the petition as well as ***. Nine firms provided usable data on their productive operations.[1] Staff believes that these responses represent the vast majority of U.S. production of threaded rod.[2]

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

[1] *** firms' data, ***, were not used in Part VI on the financial experience of U.S. producers.

[2] *** did not respond to the Commission's questionnaire or provide capacity and production data for 2018. *** reported that *** when estimating total domestic production of threaded rod in 2018. Petition at Exh. I-2.

Table III-1
Threaded rod: U.S. producers of threaded rod, their positions on the petition, production locations, and shares of reported production, 2018

Firm	Position on petition	Production location(s)	Share of production (percent)
Acme	***	Denver, CO Lancaster, PA Indianapolis, IN	***
All Ohio	***	Cleveland, OH	***
All-Pro	***	Arlington, TX	***
Alloy Stainless Fasteners	***	Houston, TX	***
B&G	***	Hatfield, PA Houston, TX	***
Bay Standard	***	Brentwood, CA	***
Dan-Loc	*** *** *** ***	Piqua, Ohio Gonzales, LA Houston, TX Houston, TX	***
Highland	***	Houston, TX	***
Vulcan	Petitioner	Pelham, AL	***
Total			***

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

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

Table III-2
Threaded rod: U.S. producers' ownership, related and/or affiliated firms

Item / Firm	Firm Name	Affiliated/Ownership
Ownership:		
***	***	***
***	***	***
***	***	***
Related importers/exporters:		
***	***	***
***	***	***
***	***	***

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

As indicated in table III-2, no U.S. producers are related to foreign producers of the subject merchandise and three U.S. producers are related to U.S. importers of the subject merchandise. In addition, as discussed in greater detail below, eight U.S. producers directly import the subject merchandise and eight purchase the subject merchandise from U.S. importers.

Table III-3 presents U.S. producers' reported changes in operations since January 1, 2016. Petitioner Vulcan reported that it purchased all of the major equipment and assets of Acme's Indianapolis, Indiana, facility in August 2017.[3]

Table III-3
Threaded rod: U.S. producers' reported changes in operations, since January 1, 2016

Item / Firm	Reported changed in operations
Plant openings:	
***	***.
Plant closings:	
***	***.
Expansions:	
***	***.
***	***.
Acquisitions:	
***	***. ***.
Prolonged shutdowns or curtailments:	
***	***.

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

[3] Conference transcript, pp. 15, 22, and 34 (Black, Logan, and Schagrin).

U.S. production, capacity, and capacity utilization

Table III-4 and figure III-1 present U.S. producers' production, capacity, and capacity utilization.

Overall, U.S. producers' capacity decreased by 7.9 percent from 2016 to 2018, but was 0.3 percent higher in interim 2019 than in interim 2018.

Overall production increased by 9.9 percent from 2016 to 2018, but was 6.1 percent lower in interim 2019 than in interim 2018. Five U.S. producers cited the availability of labor, and four cited the availability and/or capacity of associated machinery as production constraints. U.S. producers also reported energy and raw material availability, production of other products, facility size, and the volume of low priced imports as production constraints.

An overall decrease in U.S. capacity, coupled with an increase in production, resulted in a 9.4 percentage point increase in capacity utilization from 2016 to 2018, but capacity utilization was 3.8 percentage points lower in interim 2019 than in interim 2018.

Two of the eight U.S. producers, ***, reported decreases in production and capacity between 2016 and 2018. ***. ***.

In 2017, Vulcan acquired assets from Acme in an attempt to improve its competitiveness, but, according to Vulcan, rapidly rising subject imports at low prices prevented it from putting those assets into operation.[4] ***. Vulcan indicated that ***,[5] but it used more of its own equipment for these increased sales rather than the equipment it purchased from Acme, which went into storage at its facility.[6]

In 2016, *** had the highest share of U.S. production, at *** percent, followed by ***, at *** percent. With ***, its share of U.S. production dropped in 2018 to *** percent, while *** share increased to *** percent. *** had the second and third largest shares of 2018 U.S. production.

[4] Petitioners' prehearing brief, p. 1.
[5] Staff verification report, ***, October 16, 2019.
[6] Hearing transcript, p. 31 (Logan).

Table III-4
Threaded rod: U.S. producers' capacity, production, and capacity utilization, 2016-18, January to June 2018, and January to June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Capacity (1,000 pounds)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
Alloy Stainless Fasteners	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Dan-Loc	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Total capacity	275,234	256,762	253,520	126,484	126,855
	Production (1,000 pounds)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
Alloy Stainless Fasteners	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Dan-Loc	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Total production	133,905	139,807	147,144	74,910	70,340
	Capacity utilization (percent)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
Alloy Stainless Fasteners	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Dan-Loc	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Average capacity utilization	48.7	54.5	58.0	59.2	55.4
	Share of production (percent)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
Alloy Stainless Fasteners	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Dan-Loc	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Total production	100.0	100.0	100.0	100.0	100.0

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

Figure III-1
Threaded rod: U.S. producers' capacity, production, and capacity utilization, 2016-18, January to June 2018, and January to June 2019

* * * * * * *

Alternative products

As shown in table III-5, the vast majority (over ***) percent of the product produced during 2016-18 by U.S. producers was threaded rod. Six of the nine firms reported producing alternative products, including aluminum, brass, copper, silicon bronze, and stainless steel threaded rod; unthreaded rod; anchor bolts; swag bolts; u-bolts; headed bolts; and machined products.

Table III-5
Threaded rod: U.S. producers' overall plant capacity and production on the same equipment as subject production, 2016-18, January to June 2018, and January to June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Quantity (1,000 pounds)				
Overall capacity	291,913	273,684	270,737	135,619	135,619
Production:					
Threaded rod	133,905	139,807	147,144	74,910	70,340
Out-of-scope production	11,944	12,591	11,722	6,009	4,784
Total production on same machinery	145,849	152,398	158,866	80,920	75,124
	Ratios and shares (percent)				
Overall capacity utilization	50.0	55.7	58.7	59.7	55.4
Share of production:					
Threaded rod	91.8	91.7	92.6	92.6	93.6
Out-of-scope production	8.2	8.3	7.4	7.4	6.4
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.

Six of the nine firms reported the ability to switch production from threaded rod to other products. Firms reported that machinery set-up time, available tooling, cost, maintenance, cleaning, and a skilled workforce all impact producers' ability to switch production. Petitioner Vulcan reported that it is easy to shift from carbon and alloy steel to stainless steel if it is being produced with the same diameter. However, Vulcan reported that the U.S. stainless steel threaded rod market is fairly small.[7] Similarly, *** reported its ability to switch production is impacted by the ***.

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

Table III-6 presents U.S. producers' U.S. shipments, export shipments, and total shipments. U.S. commercial shipments accounted for the majority (between *** and *** percent by quantity) of total shipments, from 2016 to 2018. *** firms, *** reported transfers to related firms, which accounted for between *** percent of total shipments, by quantity. *** firms, ***, reported export shipments (to ***), and ***, reported internal consumption.

U.S. commercial shipments by quantity and value increased overall from 2016 to 2018, by *** and *** percent, respectively, and were *** percent lower, by quantity, and *** percent

[7] Conference transcript, p. 32 (Logan).

higher, by value, in interim 2019 than in interim 2018. Unit values of total shipments increased from 2016 to 2018 by *** percent, from *** per pound to *** per pound, and were *** percent higher in interim 2019 than in interim 2018.

Table III-6
Threaded rod: U.S. producers' U.S. shipments, export shipments, and total shipments, 2016-18, January to June 2018, and January to June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Quantity (1,000 pounds)				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	133,170	143,244	142,734	73,621	70,131
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	Value (1,000 dollars)				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	98,807	109,530	122,598	60,723	64,347
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	Unit value (dollars per pound)				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	0.74	0.76	0.86	0.82	0.92
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	Share of quantity (percent)				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0
	Share of value (percent)				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0

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

Table III-7 presents U.S. producers' U.S. shipments by type. Continuously threaded, non-alloy rod was the most common type of threaded rod from 2016-18, consisting of approximately three-fourths of U.S. shipments, by quantity, and two-thirds of U.S. shipments, by value. Continuously threaded alloy rod was the second most common type of threaded rod from 2016-18, consisting of approximately *** of U.S. shipments, by quantity, and *** of U.S. shipments, by value.

Non-continuously threaded rod accounted for between *** percent of U.S. shipments, by quantity, and between *** percent, by value, from 2016 to 2018.

Table III-7
Threaded rod: U.S. producers' U.S. shipments, by type, 2016-18, January to June 2018, and January to June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Quantity (1,000 pounds)				
Continuous non-alloy	98,449	106,635	101,007	52,196	50,410
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types	133,170	143,244	142,734	73,621	70,131
	Value (1,000 dollars)				
Continuous non-alloy	65,006	71,919	77,560	38,466	41,999
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types	98,807	109,530	122,598	60,723	64,347
	Unit value (dollars per pound)				
Continuous non-alloy	0.66	0.67	0.77	0.74	0.83
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types	0.74	0.76	0.86	0.82	0.92

Table continued on next page.

Table III-7—Continued
Threaded rod: U.S. producers' U.S. shipments, by type, 2016-18, January to June 2018, and January to June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Share of quantity (percent)				
Continuous non-alloy	73.9	74.4	70.8	70.9	71.9
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types	100.0	100.0	100.0	100.0	100.0
	Share of value (percent)				
Continuous non-alloy	65.8	65.7	63.3	63.3	65.3
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types	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. End-of-period inventories increased by 1.8 percent from 2016 to 2018, and were 14.7 percent higher in interim 2019 than in interim 2018. The ratio of inventories to production ranged between 13.9 and 17.2 percent from 2016 to 2018. Similarly, the ratio of inventories to U.S. shipments ranged from 13.6 to 17.3 percent throughout the same time period.

Table III-8
Threaded rod: U.S. producers' inventories, 2016-18, January to June 2018, and January to June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Quantity (1,000 pounds)				
U.S. producers' end-of-period inventories	23,079	19,445	23,488	20,355	23,337
	Ratio (percent)				
Ratio of inventories to.--					
U.S. production	17.2	13.9	16.0	13.6	16.6
U.S. shipments	17.3	13.6	16.5	13.8	16.6
Total shipments	***	***	***	***	***

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

U.S. producers' imports and purchases

U.S. producers' imports of threaded rod are presented in table III-9. Eight of the nine U.S. producers either directly imported or are related to firms that directly imported threaded rod from subject sources. Vulcan, in contrast, testified that it does not import subject threaded rod.[8] In addition, eight out of nine U.S. producers reported purchasing domestic and/or imported threaded rod. Five U.S. producers only purchased threaded rod from domestic producers; *** purchased from domestic and subject sources; and one U.S. producer (***) purchased from domestic, subject, and nonsubject sources.

[8] Conference transcript, p. 17 (Black).

Table III-9
Threaded rod: U.S. producers' U.S. production, imports and purchases, 2016-18, January to June 2018, and January to June 2019

* * * * * * *

Table continued on next page.

Table III-9—Continued
Threaded rod: U.S. producers' U.S. production, imports and purchases, 2016-18, January to June 2018, and January to June 2019

* * * * * * *

Table continued on next page.

Table III-9—Continued
Threaded rod: U.S. producers' U.S. production, imports and purchases, 2016-18, January to June 2018, and January to June 2019

* * * * * * *

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

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

U.S. employment, wages, and productivity

Table III-10 shows U.S. producers' employment-related data.[9] All employment-related indicators were higher in 2018 than in 2016. The number of production and related workers ("PRWs") increased by 5.8 percent from 2016 to 2018, and was 8.0 percent higher in interim 2019 than in interim 2018. All firms reported an overall increase in PRWs between 2016 and 2018, with the exception of ***. Hours worked increased between 2016 and 2018 by 8.7 percent, and were 3.9 percent higher in interim 2019 than in interim 2018. Wages paid increased from 2016 to 2018 by 22.7 percent, and were 4.4 percent higher in interim 2019 than in interim 2018. Productivity increased by 1.1 percent from 2016 to 2018, but was 9.6 percent lower in interim 2019 than in interim 2018. *** reported that its higher wages in 2017 and 2018 were due to "a tight labor market," and that the labor market became "very tight" in 2019. Similarly, *** attributed its higher wages to low unemployment. *** both reported increased overtime hours. A representative for Bay Standard testified that the company had added services along with threaded rod, which is very labor intensive.[10]

Table III-10
Threaded rod: Average number of production and related workers, hours worked, wages paid to such employees, hourly wages, productivity, and unit labor costs, 2016-18, January to June 2018, and January to June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
Production and related workers (PRWs)	312	333	330	288	311
Total hours worked (1,000 hours)	660	721	718	360	374
Hours worked per PRW (hours)	2,115	2,166	2,174	1,249	1,202
Wages paid ($1,000)	11,988	14,316	14,707	7,513	7,843
Hourly wages (dollars per hour)	$18.17	$19.85	$20.50	$20.88	$20.98
Productivity (pounds per hour)	202.9	193.9	205.1	208.2	188.2
Unit labor costs (dollars per pound)	$0.09	$0.10	$0.10	$0.10	$0.11

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

[9] *** employment data were not usable, so its data were estimated based on the averages for all other reporting producers and the share that threaded rod accounts for in their overall operations, as reported in question III-5 of the U.S. Producer Questionnaire.

[10] Conference transcript, p. 35 (Gross).

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

U.S. importers

The Commission issued importer questionnaires to 251 firms believed to be importers of subject threaded rod, as well as to all U.S. producers of threaded rod.[1] Usable questionnaire responses were received from 57 companies,[2] representing 58.6 percent of total U.S. imports during 2018 under HTS statistical reporting numbers 7318.15.5051, 7318.15.5056, and 7318.15.5090, covering continuously and non-continuously threaded rod that petitioners estimate correspond to the threaded rod covered by the scope of these investigations.[3] Firms responding to the Commission's questionnaire accounted for approximately the following shares of individual subject country's imports (as a share of official Commerce statistics, by quantity) during 2018:

- *** percent of imports of threaded rod from China; [4]
- *** percent of imports of threaded rod from India;
- *** percent of imports of threaded rod from Taiwan; and,
- *** percent of imports of threaded rod from Thailand.

[1] The Commission issued questionnaires to those firms identified in the petition for which a useable email address was provided, along with firms that, based on a review of data provided by U.S. Customs and Border Protection ("Customs"), may have accounted for more than one percent of total imports under HTS subheading HTS statistical reporting numbers 7318.15.5051, 7318.15.5056, 7318.15.5090, 7318.15.2095, and 7318.19.0000 in 2018.

[2] An additional twenty-five importers submitted certified responses stating that they had not imported subject threaded rod since January 1, 2016.

[3] *** firms, *** submitted a response to the importer questionnaire, but did not provide usable trade data. ***.

[4] Petitioner identified Industrial Threaded Products as a major importer of threaded rod. The company refused to provide a response to the Commission's questionnaire.

Unless otherwise noted, U.S. import data are based on official import statistics.[5] Table IV-1 lists all responding U.S. importers of threaded rod from China, India, Taiwan, and Thailand and other sources, their locations, and their shares of U.S. imports, in 2018.

Table IV-1
Threaded rod: U.S. importers, their headquarters, and share of total imports by source, 2018

Firm	Headquarters	Share of imports by source (percent)						
		China	India	Taiwan	Thailand	Subject sources	Nonsubject sources	All import sources
Acme Barricades, LC	Jacksonville, FL	***	***	***	***	***	***	***
All American Threaded Products	Lancaster, PA	***	***	***	***	***	***	***
All Axis Machining	Plano, TX	***	***	***	***	***	***	***
All Ohio Threaded Rod Company	Cleveland, OH	***	***	***	***	***	***	***
All-Pro Fasteners, Inc.	Arlington, TX	***	***	***	***	***	***	***
Alloy & Stainless Fasteners, Inc.	Houston, TX	***	***	***	***	***	***	***
Amsak Corporation	Ramsey, NJ	***	***	***	***	***	***	***
B&G Manufacturing Inc.	Hatfield, PA	***	***	***	***	***	***	***
Bay Standard Manufacturing, Inc.	Brentwood, CA	***	***	***	***	***	***	***
Brecco Corp.	Phoenix, AZ	***	***	***	***	***	***	***
Brighton-Best International, Inc.	Long Beach, CA	***	***	***	***	***	***	***
CT Technical Corporation	Pomona, CA	***	***	***	***	***	***	***
International Fasteners, Inc. ("Daggerz")	Tampa, FL	***	***	***	***	***	***	***
Dan-Loc Group, LLC	Houston, TX	***	***	***	***	***	***	***

Table continued on next page.

[5] U.S. import data are based on official import statistics using statistical reporting numbers 7318.15.5051, 7318.15.5056, and 7318.15.5090. While subject merchandise may also enter under HTS category 7318.15.2095 and 7318.19.0000, these two categories likely include substantial volumes of nonsubject merchandise, and the Petitioner believes the bulk of threaded rod imports enter under the other three HTS categories. Petitioner's posthearing brief, p. 15.

Table IV-1--Continued
Threaded rod: U.S. importers, their headquarters, and share of total imports by source, 2018

Firm	Headquarters	Share of imports by source (percent)						
		China	India	Taiwan	Thailand	Subject sources	Nonsubject sources	All import sources
Dayton Superior	Miamisburg, OH	***	***	***	***	***	***	***
DC International Imports, Inc.	Tucson, AZ	***	***	***	***	***	***	***
Elite Components	Sugar Land, TX	***	***	***	***	***	***	***
Express Bolt and Gasket	Houston, TX	***	***	***	***	***	***	***
Fastenal Company Purchasing	Winona, MN	***	***	***	***	***	***	***
Federal-Mogul Motorparts, Inc.	Southfield, MI	***	***	***	***	***	***	***
Fluid Sealing Products, Inc.	Houston, TX	***	***	***	***	***	***	***
Ford Motor Company	Dearborn, MI	***	***	***	***	***	***	***
Grainger International, Inc.	Lake Forest, IL	***	***	***	***	***	***	***
Highland Threads, Inc.	Houston, TX	***	***	***	***	***	***	***
Hilti, Inc.	Tulsa, OK	***	***	***	***	***	***	***
Home Depot U.S.A., Inc.	Atlanta, GA	***	***	***	***	***	***	***
Icon Exim Inc.	Chantilly, VA	***	***	***	***	***	***	***
KM Fasteners, LLC	Salt Lake City, UT	***	***	***	***	***	***	***
Kratos Building Products	Farmers Branch, TX	***	***	***	***	***	***	***
Lamons Gaskets Company	Houston, TX	***	***	***	***	***	***	***
Laube Technology	Camarillo, CA	***	***	***	***	***	***	***
Leo International Inc.	Brooklyn, NY	***	***	***	***	***	***	***
Lindstrom, LLC	Blaine, MN	***	***	***	***	***	***	***
Linus Building Products, Inc.	Houston, TX	***	***	***	***	***	***	***

Table continued on next page.

Table IV-1--Continued
Threaded rod: U.S. importers, their headquarters, and share of total imports by source, 2018

Firm	Headquarters	Share of imports by source (percent)						
		China	India	Taiwan	Thailand	Subject sources	Nonsubject sources	All import sources
Lippincott Supply Co.	Vallejo, CA	***	***	***	***	***	***	***
Marine Fasteners, Inc.	Sanford, FL	***	***	***	***	***	***	***
Midwest Fastener Corp.	Portage, MI	***	***	***	***	***	***	***
Mighty Sourcing International, LLC	Palatine, IL	***	***	***	***	***	***	***
M.T.A. Developments Ltd.	Caesarea,	***	***	***	***	***	***	***
Nuts & Bolts America, Inc.	Omaha, NE	***	***	***	***	***	***	***
Paradiigm LLC	Alexandria, VA	***	***	***	***	***	***	***
3V Metals dba Powerline Hardware	Jacksonville, FL	***	***	***	***	***	***	***
PrimeSource Building Products, Inc.	Irving, TX	***	***	***	***	***	***	***
R.B. Industries, Inc.	Morton Grove, IL	***	***	***	***	***	***	***
R.H. Keleher Co., Inc.	Sharon, MA	***	***	***	***	***	***	***
Shandex Corporation	Fort Lee, NJ	***	***	***	***	***	***	***
Shibata Fender Team, Inc.	Lansdowne, VA	***	***	***	***	***	***	***
Siemens Gamesa Renewable Energy, Inc.	Orlando, FL	***	***	***	***	***	***	***

Table continued on next page.

Table IV-1--Continued
Threaded rod: U.S. importers, their headquarters, and share of total imports by source, 2018

Firm	Headquarters	Share of imports by source (percent)						
		China	India	Taiwan	Thailand	Subject sources	Nonsubject sources	All import sources
Sigma Fasteners, Inc.	Houston, TX	***	***	***	***	***	***	***
Stanley Black & Decker	New Britain, CT	***	***	***	***	***	***	***
Steelex Inc.	White Plains, NY	***	***	***	***	***	***	***
Stelfast Inc.	Strongsville, OH	***	***	***	***	***	***	***
Technical Manufacturing Corporation	Peabody, MA	***	***	***	***	***	***	***
Unbrako LLC	Downey, CA	***	***	***	***	***	***	***
Versabar Corporation	Totowa, NJ	***	***	***	***	***	***	***
Warwick Industrial Fasteners	Warwick, RI	***	***	***	***	***	***	***
Wurth Revcar Fasteners	Roanoke, VA	***	***	***	***	***	***	***
Total		***	***	***	***	***	***	***

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

U.S. imports

Table IV-2 and figure IV-1 present data for U.S. imports of threaded rod from China, India, Taiwan, Thailand, and all other sources. By quantity, during 2016-18, total U.S. imports of threaded rod increased by 36.2 percent, and were higher by 21.5 percent in January-June 2019 than in January-June 2018. Subject imports similarly increased by 47.6 percent during the same period, and were higher by 22.3 percent in January-June 2019 than in January-June 2018. Specifically, U.S. imports of threaded rod from China increased by 109.6 percent during 2016-18 and were higher by 19.0 percent in January-June 2019 than in January-June 2018. U.S. imports of threaded rod from India increased by 21.6 percent during 2016-18, and were higher by 34.5 percent in January-June 2019 than in January-June 2018. U.S. imports of threaded rod from Taiwan increased by 6.4 percent during 2016-18 and were higher by 15.5 percent in January-June 2019 than in January-June 2018. U.S. imports of threaded rod from Thailand decreased by 2.6 percent, respectively, during 2016-18, but were higher by 1.4 percent in January-June 2019 than in January-June 2018. As a share of quantity, imports of threaded rod from subject sources accounted for 87.6 percent of total U.S. imports in 2018, with imports from China alone accounting for 44.2 percent of total U.S. imports of threaded rod. U.S. imports of threaded rod from nonsubject sources decreased by 11.8 percent during 2016-18, but were higher by 15.7 percent in January-June 2019 than in January-June 2018, and accounted for 12.4 percent of total U.S. imports in 2018.

Unit values of U.S. imports of threaded rod from all subject sources increased by 15.9 percent during 2016-18, were higher by 1.3 percent in January-June 2019 than in January-June 2018, and were consistently lower than unit values of imports from nonsubject sources. The ratio of U.S. imports from all subject sources to U.S. production was equivalent to 179.6 percent of U.S. production in 2018, increased by 45.9 percentage points during 2016-18, and was higher by 46.0 percentage points in January-June 2019 than in January-June 2018.

Table IV-2
Threaded rod: U.S. imports by source, 2016-18, January-June 2018, and January-June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Quantity (1,000 pounds)				
U.S. imports from.--					
China	63,613	93,971	133,300	52,150	62,059
India	61,126	70,416	74,301	35,389	47,593
Taiwan	42,155	38,184	44,861	20,590	23,786
Thailand	12,096	10,415	11,783	5,617	5,695
Subject sources	178,989	212,986	264,245	113,746	139,133
Nonsubject sources	42,521	38,521	37,497	16,884	19,527
All import sources	221,510	251,507	301,742	130,630	158,660
	Value (1,000 dollars)				
U.S. imports from.--					
China	51,503	73,439	116,514	45,917	58,590
India	26,516	32,026	39,741	18,011	25,809
Taiwan	43,350	48,481	54,191	25,465	27,142
Thailand	5,202	4,933	6,084	2,904	2,809
Subject sources	126,570	158,878	216,530	92,297	114,349
Nonsubject sources	105,335	100,476	104,728	48,969	57,667
All import sources	231,905	259,354	321,258	141,265	172,016
	Unit value (dollars per pound)				
U.S. imports from.--					
China	0.81	0.78	0.87	0.88	0.94
India	0.43	0.45	0.53	0.51	0.54
Taiwan	1.03	1.27	1.21	1.24	1.14
Thailand	0.43	0.47	0.52	0.52	0.49
Subject sources	0.71	0.75	0.82	0.81	0.82
Nonsubject sources	2.48	2.61	2.79	2.90	2.95
All import sources	1.05	1.03	1.06	1.08	1.08

Table continued on next page.

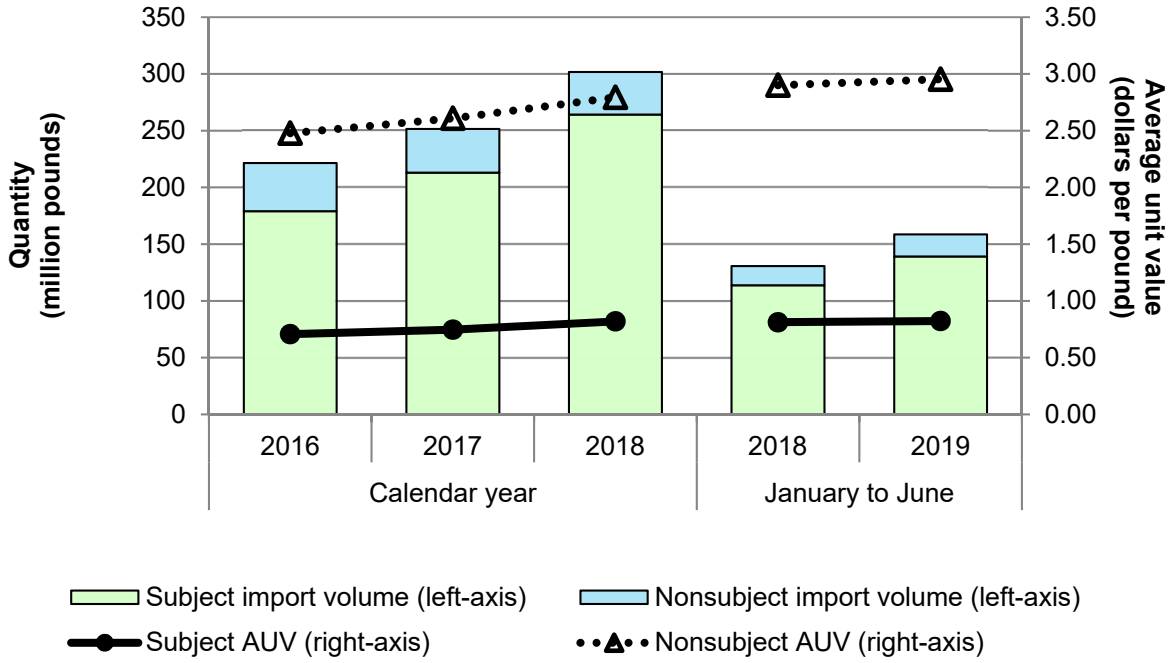
Table IV-2--Continued
Threaded rod: U.S. imports by source, 2016-18, January-June 2018, and January-June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Share of quantity (percent)				
U.S. imports from.--					
China	28.7	37.4	44.2	39.9	39.1
India	27.6	28.0	24.6	27.1	30.0
Taiwan	19.0	15.2	14.9	15.8	15.0
Thailand	5.5	4.1	3.9	4.3	3.6
Subject sources	80.8	84.7	87.6	87.1	87.7
Nonsubject sources	19.2	15.3	12.4	12.9	12.3
All import sources	100.0	100.0	100.0	100.0	100.0
	Share of value (percent)				
U.S. imports from.--					
China	22.2	28.3	36.3	32.5	34.1
India	11.4	12.3	12.4	12.7	15.0
Taiwan	18.7	18.7	16.9	18.0	15.8
Thailand	2.2	1.9	1.9	2.1	1.6
Subject sources	54.6	61.3	67.4	65.3	66.5
Nonsubject sources	45.4	38.7	32.6	34.7	33.5
All import sources	100.0	100.0	100.0	100.0	100.0
	Ratio to U.S. production				
U.S. imports from.--					
China	47.5	67.2	90.6	69.6	88.2
India	45.6	50.4	50.5	47.2	67.7
Taiwan	31.5	27.3	30.5	27.5	33.8
Thailand	9.0	7.4	8.0	7.5	8.1
Subject sources	133.7	152.3	179.6	151.8	197.8
Nonsubject sources	31.8	27.6	25.5	22.5	27.8
All import sources	165.4	179.9	205.1	174.4	225.6

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

Source: Compiled from official U.S. import statistics using statistical reporting numbers 7318.15.5051, 7318.15.5056, and 7318.15.5090, accessed September 23, 2019.

Figure IV-1
Threaded rod: U.S. import volumes and prices, 2016-18, January-June 2018 and January-June 2019



Source: Compiled from official U.S. import statistics using statistical reporting numbers 7318.15.5051, 7318.15.5056, and 7318.15.5090, accessed September 23, 2019.

Critical circumstances

On October 21, 2019, Commerce issued its final determination that "critical circumstances" exist with regard to imports from Thailand of threaded rod.[6] In this investigation, if both Commerce and the Commission make affirmative final critical circumstances determinations, certain subject imports may be subject to antidumping duties retroactive by 90 days from August 7, 2019, the effective date of Commerce's preliminary affirmative LTFV determination. Table IV-3 and figure IV-2 present this data.

Table IV-3
Threaded rod: U.S. imports subject to Commerce's affirmative final critical circumstances determination

Period	Actual monthly quantity (1,000 dry pounds)	Outwardly cumulative subtotals (1,000 dry pounds)	Percentage change from comparable period (percent)
September 2018	***	***	
October 2018	***	***	
November 2018	***	***	
December 2018	***	***	
January 2019	***	***	
February 2019	***	***	
Petition file date: February 21, 2019			
March 2019	***	***	***
April 2019	***	***	***
May 2019	***	***	***
June 2019	***	***	***
July 2019	***	***	***
August 2019	***	***	***

Source: Compiled from *** customs data from *** using HTS number 7318.15.5051, 7318.15.5056 and 7318.15.5090, accessed October 30, 2019

[6] 84 FR 56162, October 21, 2019, 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.

Figure IV-2
Threaded rod: U.S. imports from Thailand potentially subject to Commerce's final critical circumstances determination, September 2018 through August 2019

* * * * * * *

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.[7] Negligible imports are generally defined in the Act, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.[8] As presented in table IV-4, based

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

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

on official statistics, imports from China, India, Taiwan, and Thailand accounted for 87.5 percent of total imports of threaded rod by quantity during the twelve month period preceding the filing of the petition.

Table IV-4
Threaded rod: U.S. imports in the twelve month period preceding the filing of the petition, February 2018 through January 2019

Item	February 2018 through January 2019	
	Quantity (1,000 pounds)	Share quantity (percent)
U.S. imports from.--		
China (AD)	133,581	42.8
China (CVD)	137,714	44.1
India	78,188	25.1
Taiwan	45,450	14.6
Thailand	11,767	3.8
Subject sources	273,119	87.5
Nonsubject sources	38,990	12.5
All import sources	312,109	100.0

Note: Imports of carbon-quality threaded rod from China are subject to an existing antidumping duty order. Thus, imports from China entering under HTS statistical reporting number 7318.15.5056 (non-alloy threaded rod) are not included in the China (AD) quantity.

Source: Compiled from official U.S. import statistics using statistical reporting numbers 7318.15.5051, 7318.15.5056, and 7318.15.5090, accessed September 23, 2019.

Cumulation considerations

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

Fungibility

Table IV-5 and figures IV-3 and IV-4 presents U.S. producers' shipments and U.S. importers' imports by steel type and whether or not continuously threaded.[9] Both alloy and

[9] U.S. imports by type can also be found at Appendix E.

non-alloy threaded rod are widely sold in the U.S. market. U.S. producers' U.S. shipments consisted of *** percent continuous non-alloy threaded rod and *** percent continuous alloy threaded rod, while U.S. importers' subject imports consisted of *** percent continuous non-alloy threaded rod and *** percent continuous alloy threaded rod. The majority of imports of threaded rod from China during 2018 were of continuous alloy threaded rod, while the majority of imports from India, Taiwan, and Thailand were of continuous non-alloy threaded rod. U.S. producers and subject importers both reported small quantities of ***.

Table IV-5
Threaded rod: U.S. producers' and U.S. importers U.S. shipments by item, February 2018 - January 2019

	Continuously threaded non-alloy	Continuously threaded alloy	Non-continuously threaded non-alloy	Non-continuously threaded alloy	All product types
	Quantity (1,000 pounds)				
U.S. producers' U.S. shipments	101,007	***	***	***	***
U.S. importers' U.S. imports from.--					
China	***	***	***	***	***
India	***	***	***	***	***
Taiwan	***	***	***	***	***
Thailand	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	65,540	106,210	***	***	***
Combined producer and importer	166,546	***	***	***	***
	Share across (percent)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. importers' U.S. imports from.--					
China	***	***	***	***	***
India	***	***	***	***	***
Taiwan	***	***	***	***	***
Thailand	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
Combined producer and importer	***	***	***	***	***

Table continued on next page.

Table IV-5--Continued
Threaded rod: U.S. producers' and U.S. importers U.S. shipments by item, February 2018 - January 2019

	Continuous non-alloy	Continuous alloy	Non-continuous non-alloy	Non-continuous alloy	All product types
	Share down (percent)				
U.S. producers' U.S. shipments	60.6	***	***	***	***
U.S. importers' U.S. imports from.--					
China	***	***	***	***	***
India	***	***	***	***	***
Taiwan	***	***	***	***	***
Thailand	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	39.4	***	***	***	***
Combined producer and importer	100.0	***	***	***	***

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

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

Figure IV-3
Threaded rod: U.S. producers' and U.S. importers' U.S. shipments by alloy vs non-alloy, 2018

* * * * * * *

Figure IV-4
Threaded rod: U.S. producers' and U.S. importers' U.S. shipments by continuously vs non-continuously threaded rod, 2018

* * * * * * *

Geographical markets

As shown in table IV-6, U.S. imports of threaded rod from all import sources entered through all borders of entry in 2018. U.S. imports of threaded rod from China, India, Taiwan, and Thailand entered multiple ports of entry throughout the United States. The majority of imports of threaded rod from China entered via the South, while import entries of threaded rod from India and Thailand entered through the East, and entries of threaded rod from Taiwan entered through the North.

Table IV-6
Threaded rod: U.S. imports by border of entry, 2018

Item	Border of entry				
	East	North	South	West	All borders
	Quantity (1,000 pounds)				
U.S. imports from.-- China	12,725	9,886	101,058	9,631	133,300
India	27,034	11,343	16,942	18,982	74,301
Taiwan	10,315	14,513	5,403	14,629	44,861
Thailand	4,277	1,798	2,760	2,948	11,783
Subject sources	54,351	37,541	126,164	46,190	264,245
Nonsubject sources	6,682	13,322	14,362	3,131	37,497
All import sources	61,033	50,863	140,526	49,320	301,742
	Share across (percent)				
U.S. imports from.-- China	9.5	7.4	75.8	7.2	100.0
India	36.4	15.3	22.8	25.5	100.0
Taiwan	23.0	32.4	12.0	32.6	100.0
Thailand	36.3	15.3	23.4	25.0	100.0
Subject sources	20.6	14.2	47.7	17.5	100.0
Nonsubject sources	17.8	35.5	38.3	8.3	100.0
All import sources	20.2	16.9	46.6	16.3	100.0
	Share down (percent)				
U.S. imports from.-- China	20.8	19.4	71.9	19.5	44.2
India	44.3	22.3	12.1	38.5	24.6
Taiwan	16.9	28.5	3.8	29.7	14.9
Thailand	7.0	3.5	2.0	6.0	3.9
Subject sources	89.1	73.8	89.8	93.7	87.6
Nonsubject sources	10.9	26.2	10.2	6.3	12.4
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics using statistical reporting numbers 7318.15.5051, 7318.15.5056, and 7318.15.5090, accessed September 23, 2019.

Presence in the market

Table IV-7 and figures IV-5 and IV-6 present the monthly data for U.S. imports of threaded rod from subject and nonsubject sources between January 2016 and June 2019. Based on official import statistics, subject U.S. imports of threaded rod from China, India, Taiwan, and Thailand were present in each month from January 2016 through July 2019. Between March 2018 and December 2018, imports from China increased nearly three-fold, fell in early 2019 to early 2018 levels, but increased again through July 2019.

Table IV-7
Threaded rod: U.S. imports, by month, January 2016 through August 2019

U.S. imports	China	India	Taiwan	Thailand	Subject sources	Nonsubject sources	All import sources
	Quantity (1,000 pounds)						
2016: January	5,262	4,675	3,367	887	14,191	3,246	17,437
2016: February	5,705	3,889	3,012	557	13,163	4,000	17,163
2016: March	4,182	5,711	2,655	1,241	13,789	4,321	18,110
2016: April	4,697	4,908	3,253	1,764	14,622	3,722	18,344
2016: May	4,850	5,405	3,915	335	14,506	3,524	18,030
2016: June	5,519	4,254	3,388	1,060	14,222	2,861	17,083
2016: July	5,004	5,667	3,241	1,360	15,273	3,040	18,313
2016: August	5,613	5,386	4,339	1,066	16,404	4,039	20,443
2016: September	5,765	5,115	4,514	1,095	16,488	2,965	19,454
2016: October	4,916	5,235	2,832	1,008	13,990	3,238	17,228
2016: November	4,273	5,906	3,981	851	15,011	3,972	18,983
2016: December	7,826	4,974	3,659	871	17,329	3,593	20,922
2017: January	8,150	6,822	3,498	550	19,019	3,290	22,308
2017: February	5,356	5,042	3,512	743	14,653	3,581	18,234
2017: March	6,028	6,156	3,241	560	15,985	3,366	19,352
2017: April	6,338	5,406	2,531	1,009	15,283	2,892	18,175
2017: May	8,918	6,564	3,910	766	20,157	3,280	23,437
2017: June	10,639	5,272	3,236	651	19,799	3,365	23,164
2017: July	8,747	5,388	3,525	970	18,631	3,051	21,683
2017: August	7,783	5,231	2,896	1,078	16,988	3,569	20,556
2017: September	9,443	5,882	3,374	1,104	19,803	3,181	22,984
2017: October	8,332	6,539	2,883	811	18,564	3,248	21,812
2017: November	6,887	6,412	2,856	1,180	17,335	2,761	20,096
2017: December	7,350	5,703	2,722	994	16,768	2,938	19,706
2018: January	8,024	5,946	4,225	903	19,098	2,608	21,706
2018: February	8,587	5,953	3,101	411	18,052	2,821	20,873
2018: March	6,827	6,342	2,980	1,300	17,450	3,077	20,527
2018: April	7,961	5,091	3,669	1,347	18,069	2,774	20,843
2018: May	9,920	6,259	3,063	1,088	20,330	3,091	23,422
2018: June	10,830	5,797	3,551	568	20,746	2,513	23,259
2018: July	12,125	5,871	3,942	1,083	23,021	2,893	25,914
2018: August	12,989	6,995	3,626	805	24,415	3,507	27,922

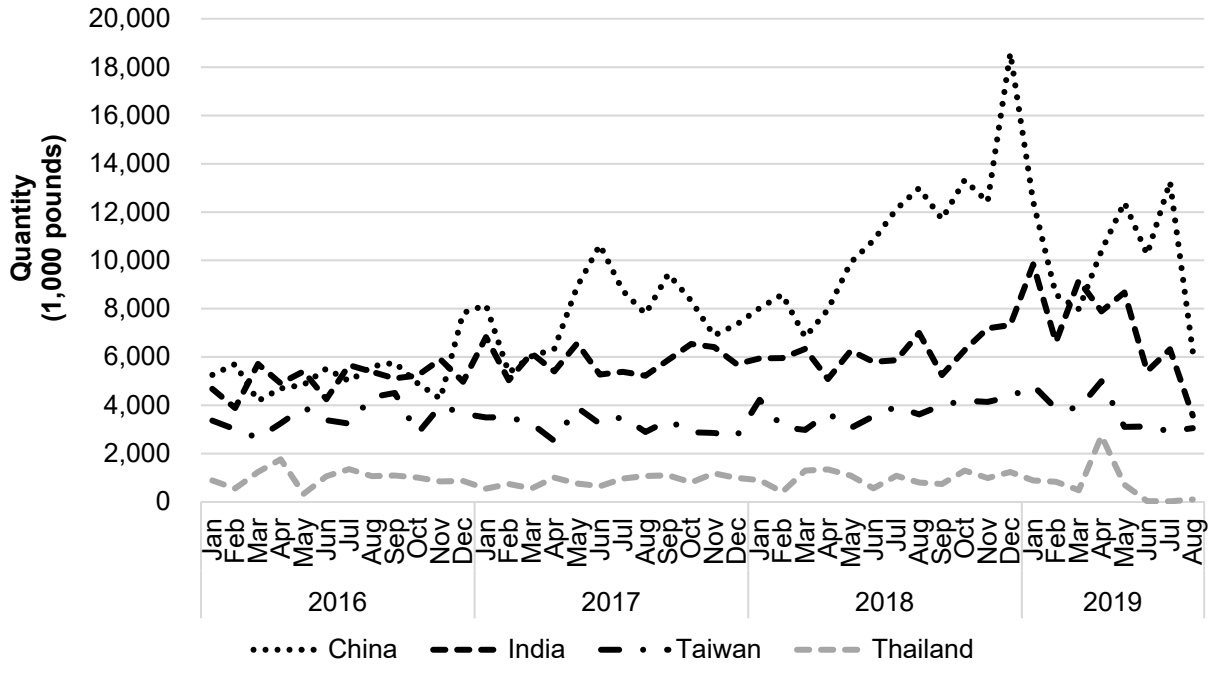
Table continued on next page.

Table IV-7--Continued
Threaded rod: U.S. imports, by month, January 2016 through August 2019

U.S. imports	China	India	Taiwan	Thailand	Subject sources	Nonsubject sources	All import sources
	Quantity (1,000 pounds)						
2018: September	11,708	5,252	4,007	743	21,710	3,451	25,161
2018: October	13,327	6,285	4,197	1,301	25,109	3,977	29,087
2018: November	12,421	7,188	4,142	989	24,740	3,815	28,555
2018: December	18,581	7,322	4,358	1,244	31,504	2,969	34,474
2019: January	12,437	9,833	4,815	887	27,972	4,100	32,072
2019: February	8,580	6,616	3,868	838	19,902	2,595	22,497
2019: March	7,990	9,171	3,877	486	21,525	3,524	25,049
2019: April	10,404	7,892	4,998	2,736	26,029	3,203	29,232
2019: May	12,402	8,673	3,108	715	24,898	2,894	27,792
2019: June	10,246	5,407	3,120	34	18,807	3,210	22,017
2019: July	13,258	6,321	2,923	26	22,528	3,493	26,020
2019: August	6,225	3,579	3,055	102	12,962	4,209	17,171

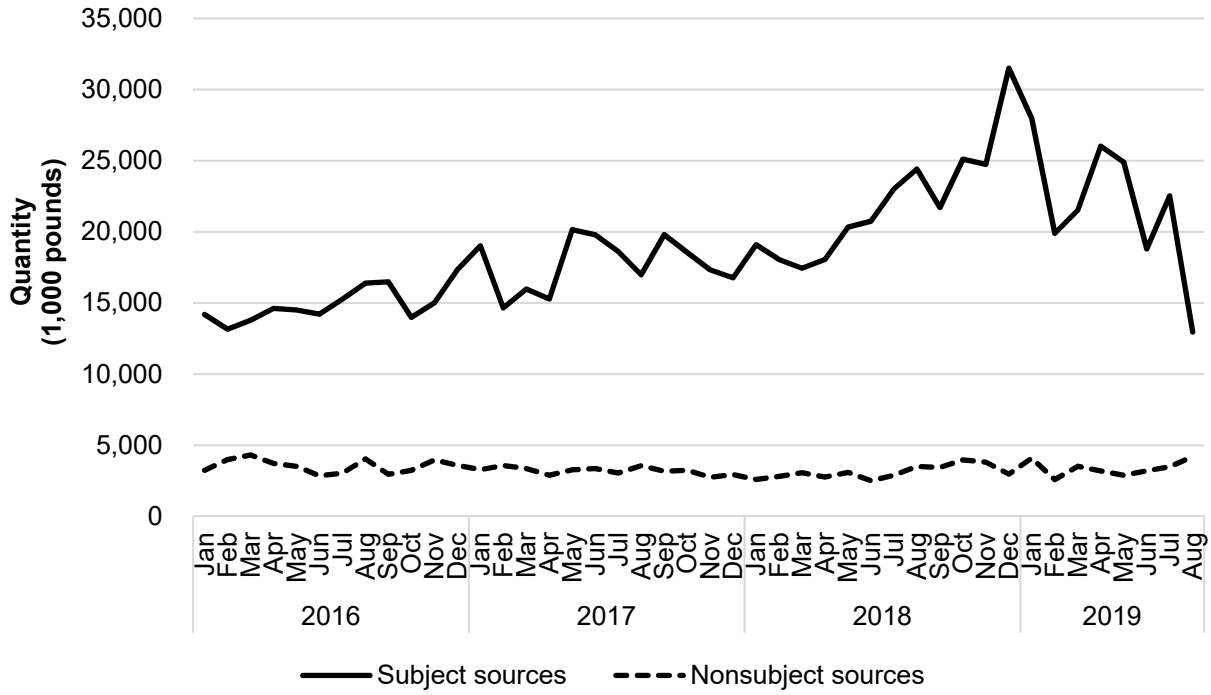
Source: Compiled from official U.S. import statistics using statistical reporting numbers 7318.15.5051, 7318.15.5056, and 7318.15.5090, accessed September 23, 2019.

Figure IV-5
Threaded rod: U.S. imports, by month, January 2016 through August 2019



Source: Compiled from official U.S. import statistics using statistical reporting numbers 7318.15.5051, 7318.15.5056, and 7318.15.5090, accessed September 23, 2019.

Figure IV-6
Threaded rod: Monthly U.S. imports from aggregated subject and nonsubject sources, January 2016 through August 2019



Source: Compiled from official U.S. import statistics using statistical reporting numbers 7318.15.5051, 7318.15.5056, and 7318.15.5090, accessed September 23, 2019.

Apparent U.S. consumption

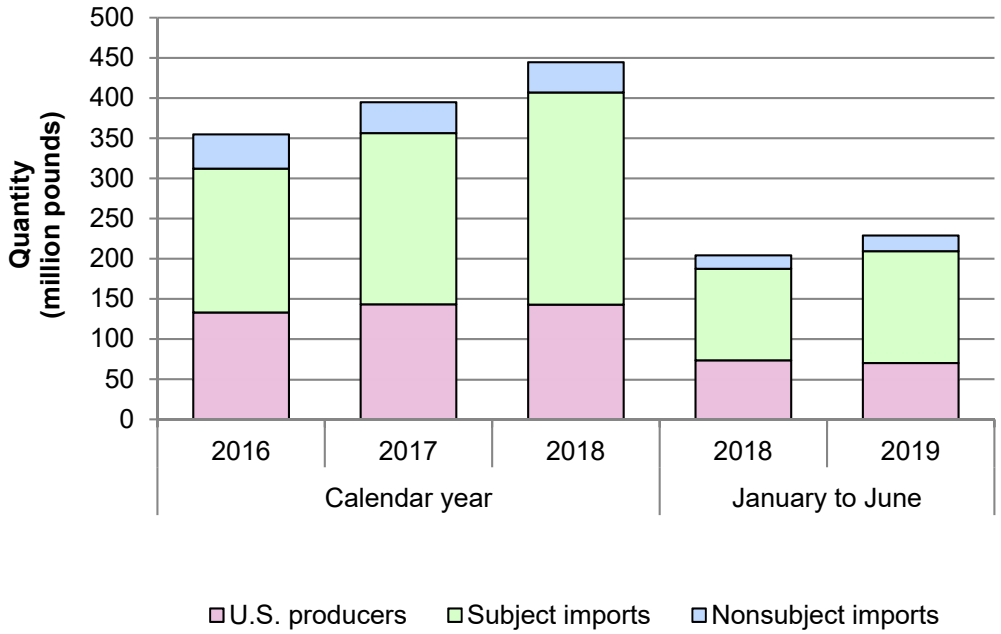
Table IV-8 and figure IV-7 presents data on apparent U.S. consumption and U.S. market shares for threaded rod. Apparent U.S. consumption increased by 25.3 percent from 2016 to 2018, based on quantity.

Table IV-8
Threaded rod: Apparent U.S. consumption, 2016-18, January-June 2018, and January-June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Quantity (1,000 pounds)				
U.S. producers' U.S. shipments	133,170	143,244	142,734	73,621	70,131
U.S. imports from.--					
China	63,613	93,971	133,300	52,150	62,059
India	61,126	70,416	74,301	35,389	47,593
Taiwan	42,155	38,184	44,861	20,590	23,786
Thailand	12,096	10,415	11,783	5,617	5,695
Subject sources	178,989	212,986	264,245	113,746	139,133
Nonsubject sources	42,521	38,521	37,497	16,884	19,527
All import sources	221,510	251,507	301,742	130,630	158,660
Apparent U.S. consumption	354,680	394,751	444,476	204,251	228,791
	Value (1,000 dollars)				
U.S. producers' U.S. shipments	98,807	109,530	122,598	60,723	64,347
U.S. imports from.--					
China	51,503	73,439	116,514	45,917	58,590
India	26,516	32,026	39,741	18,011	25,809
Taiwan	43,350	48,481	54,191	25,465	27,142
Thailand	5,202	4,933	6,084	2,904	2,809
Subject sources	126,570	158,878	216,530	92,297	114,349
Nonsubject sources	105,335	100,476	104,728	48,969	57,667
All import sources	231,905	259,354	321,258	141,265	172,016
Apparent U.S. consumption	330,711	368,884	443,856	201,988	236,363

Source: Compiled from official U.S. import statistics using statistical reporting numbers 7318.15.5051, 7318.15.5056, and 7318.15.5090, accessed September 23, 2019.

Figure IV-7
Threaded rod: Apparent U.S. consumption, 2016-18, January-June 2018, and January-June 2019



Source: Compiled from official U.S. import statistics using statistical reporting numbers 7318.15.5051, 7318.15.5056, and 7318.15.5090, accessed September 23, 2019.

U.S. market shares

U.S. market share data are presented in table IV-9. U.S. producers' market share, by quantity, decreased by 5.4 percentage points between 2016 and 2018. Subject import market share increased by 9.0 percentage points while nonsubject import market share decreased by 3.6 percentage points during the same period.

Table IV-9
Threaded rod: U.S. consumption and market shares, 2016-18, January-June 2018, and January-June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Quantity (1,000 pounds)				
Apparent U.S. consumption	354,680	394,751	444,476	204,251	228,791
	Share of quantity (percent)				
U.S. producers' U.S. shipments	37.5	36.3	32.1	36.0	30.7
U.S. imports from.--					
China	17.9	23.8	30.0	25.5	27.1
India	17.2	17.8	16.7	17.3	20.8
Taiwan	11.9	9.7	10.1	10.1	10.4
Thailand	3.4	2.6	2.7	2.8	2.5
Subject sources	50.5	54.0	59.5	55.7	60.8
Nonsubject sources	12.0	9.8	8.4	8.3	8.5
All import sources	62.5	63.7	67.9	64.0	69.3
	Value (1,000 dollars)				
Apparent U.S. consumption	330,711	368,884	443,856	201,988	236,363
	Share of value (percent)				
U.S. producers' U.S. shipments	29.9	29.7	27.6	30.1	27.2
U.S. imports from.--					
China	15.6	19.9	26.3	22.7	24.8
India	8.0	8.7	9.0	8.9	10.9
Taiwan	13.1	13.1	12.2	12.6	11.5
Thailand	1.6	1.3	1.4	1.4	1.2
Subject sources	38.3	43.1	48.8	45.7	48.4
Nonsubject sources	31.9	27.2	23.6	24.2	24.4
All import sources	70.1	70.3	72.4	69.9	72.8

Source: Compiled from official U.S. import statistics using statistical reporting numbers 7318.15.5051, 7318.15.5056, and 7318.15.5090, accessed September 23, 2019.

Part V: Pricing data

Factors affecting prices

Raw material costs

Threaded rod is made primarily from steel wire rod, which is typically cold-drawn, straightened, cut to length, threaded, and then sometimes plated or galvanized.[1] Raw materials are the largest component of the total cost of goods sold ("COGS") for threaded rod. U.S. producers reported that raw materials increased from a share of *** percent of total COGS in 2016 to *** percent in 2018.

The costs of wire rod and merchant bar increased by *** percent and *** percent, respectively, between January 2016 and June 2019 (figure V-1).[2] Alloy steel threaded rod uses a more expensive alloy steel as a raw material than low-carbon steel threaded rod, and also undergoes a heat treatment process that carbon steel threaded rod does not.[3]

Figure V-1
Raw materials: Wire rod and merchant bar prices, monthly, January 2016-June 2019

* * * * * * *

Source: ***, various monthly issues.

[1] Petition, Volume I, p. 7.

[2] A combination of antidumping and countervailing duty orders on carbon and certain alloy steel wire rod from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, United Arab Emirates, and the United Kingdom entered into effect in the United States in the first half of 2018.

[3] Hearing transcript, pp. 68, 69 (Black, Graham).

Most U.S. producers (7 of 9) and most responding importers (26 of 47) reported that raw material prices had increased since 2016, specifically citing rising steel prices and the 232 duties. Petitioner Vulcan stated that while its raw materials are the largest share of its costs, it is not able to pass these costs along.[4] When asked about the impact of 301 and 232 tariffs, U.S. producers, importers, and purchasers reported that prices and raw material costs have increased (see Part II).

Most U.S. producers (5 of 9) and some importers (9 of 46) reported that the AD/CVD orders on wire rod had impacted raw material costs for threaded rod.[5] [6] Four U.S. producers and 12 importers reported that AD/CVD duties have increased raw material costs for threaded rod. Three U.S. producers and 16 importers reported that AD/CVD duties on wire rod increased prices in the threaded rod market. As discussed in part II, U.S. producers, importers, and purchasers reported that section 301 and section 232 tariffs increased the cost of raw materials for threaded rod, as well as the price for threaded rod itself.

Most purchasers (23 of 35) reported that they were not familiar with raw material costs. However, ten purchasers reported that raw material costs affected contracts, including contract negotiations and price increases. Three purchasers reported that the 232 steel tariffs have affected raw materials costs and the resulting contracts for threaded rod.

Transportation costs to the U.S. market

Transportation costs for threaded rod shipped from subject countries to the United States averaged 8.5 percent for China, 10.9 percent for India, 6.2 percent for Taiwan, and 7.7 percent for Thailand during 2018. These estimates were derived from official import data and represent the transportation and other charges on imports.[7]

U.S. inland transportation costs

Four of eight responding U.S. producers and 36 of 47 responding importers reported that they typically arrange transportation to their customers. Most U.S. producers reported

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[4] Hearing transcript, pp. 27, 70 (Black, Schagrin).

[5] See *Certain Steel Threaded Rod from the People's Republic of China: Notice of Antidumping Duty Order*, 74 FR 17154 (April 14, 2009).

[6] Twenty-nine importers reported that they did not know if AD/CVD orders on wire rod had an impact on raw material prices for threaded rod.

[7] The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2018 and then dividing by the customs value based on the HTS subheading 7318.15.5051, 7318.15.5056, and 7318.15.5090.

that their U.S. inland transportation costs ranged from 2 to 5 percent while most importers reported costs of 1 to 8 percent.

Pricing practices

Pricing methods

All U.S. producers and most importers reported using transaction-by-transaction negotiations, in addition, some used contracts, price lists, and other methods (table V-1).

Table V-1
Threaded rod: U.S. producers' and importers' reported price setting methods, by number of responding firms

Method	U.S. producers	U.S. importers
Transaction-by-transaction	9	39
Contract	2	11
Set price list	2	10
Other	1	9
Responding firms	9	50

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

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

U.S. producers and importers reported selling the vast majority of their threaded rod in the spot market. As shown in table V-2, U.S. producers and importers reported their 2018 U.S. commercial shipments of threaded rod by type of sale.

Table V-2
Threaded rod: U.S. producers' and importers' shares of U.S. commercial shipments by type of sale, 2018

Item	U.S. producers	Subject U.S. importers
	Share (percent)	
Share of commercial U.S. shipments.-- Long-term contracts	***	0.4
Annual contract	***	1.7
Short-term contracts	***	17.2
Spot sales	***	80.7

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

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

U.S. producers reported short-term contracts ranging from *** days. Two U.S. producers reported contract provisions of short-term contracts; both did not allow price renegotiations during these contracts, otherwise their provisions differed by firm.[8] U.S. producer and importer Bay Standard stated that while it does have some short-term, fixed price contracts that last for six months, it changed its offerings for high-volume customers and now review their contracts every 30 to 90 days to account for changing raw material costs, although the contracts do not specifically account for raw material prices.[9] Petitioner Vulcan stated that it may occasionally offer pricing on short-term contracts lasting three months for its larger customers, but that generally raw material pricing mechanisms are not included in its pricing.[10]

Importers reported short-term contracts ranging from 30 to 180 days, while importers' long-term contracts lasted ***. Thirteen importers reported contract provisions of short-term contracts, none of which included raw material indexes in these contracts. Most responding importers (7 of 12) did not allow price renegotiations during contracts and fixed price. Nine importers reported the characteristics of one-year contracts. Most of these did not allow price renegotiations, fixed both price and quantity, and were not indexed to raw material costs. Of the four importers reporting characteristics of long-term contracts, most reported no price renegotiations, fixed prices, and did not index to raw material costs.

Petitioner Vulcan stated that its customers are large nationwide distributors that have strong purchasing power and negotiate directly with their suppliers.[11]

Nine purchasers reported that they purchase product daily, 9 purchase weekly, and 10 purchase monthly. Thirty of 35 responding purchasers reported that their purchasing frequency had not changed since 2016. Most (24 of 34) purchasers contact 1 to 3 suppliers before making a purchase. More than half of responding purchasers (18 of 35) reported that their purchases involved negotiations including prices, payment terms, delivery terms, and lead times, and several purchasers stated that they do not quote competing prices during the negotiations. Petitioner Vulcan and U.S. producer and importer Bay Standard stated that while it is not common for purchasers to discuss raw material prices in negotiations, it is "very common" for purchasers to reference import prices of threaded rod.[12] Bay Standard stated that while

[8] Only *** reported annual contracts, with no price renegotiations, fixed price and quantity, and no indexing to raw material costs.

[9] Hearing transcript, pp. 45, 52, 54 (Gross).

[10] Hearing transcript, p. 52 (Black).

[11] Hearing transcript, p. 26 (Black).

[12] Hearing transcript, pp. 77, 96 (Black and Gross, Black).

purchasers have requested lower prices to account for falling raw material costs, it has offset purchaser requests by emphasizing its value-added services and increased minimum wages in California.[13]

Sales terms and discounts

Five of nine producers reported sales on an f.o.b. basis while most importers (27 of 46) reported sales on a delivered basis. The remaining firms reported quoting prices on an f.o.b. basis. Nearly half of the responding producers (4 of 9) reported no discount policy, three reported quantity discounts, two reported total volume discounts, and one reported other discounts (prices were set based on expected volume). Most importers (25 of 45) reported no discount policy, 13 reported quantity discounts, 8 reported total volume discounts, and 7 reported other discounts including rebates and early payment discounts.

Price leadership

Sixteen purchasers reported one or more price leaders. Price leaders reported by more than one purchaser included Highland Threads, Brighton Best, and Vulcan/Steel Dynamics. Purchasers frequently reported that price leaders acted as such in a limited area, others reported that the firm's size overall put it in a position of price leadership, and Vulcan/Steel Dynamics was reported to be a price leader because of its importance as a U.S. producer.

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 threaded rod products shipped to unrelated U.S. customers during January 2016-June 2019.

Product 1.--Low-carbon steel fully threaded rod, electroplated with zinc, a 3/8 in diameter, 16 threads per inch, in 10-foot lengths, in cardboard tubes.

Product 2.--Low-carbon steel fully threaded rod, electroplated with zinc, a 1/2 in diameter, 13 threads per inch, in 10-foot lengths, in cardboard tubes.

Product 3.--Low-carbon steel fully threaded rod, electroplated with zinc, a 3/4 in diameter, 10 threads per inch, in 12-foot lengths, in cardboard tubes.

[13] Hearing transcript, p. 95 (Gross).

Product 4.--Low-carbon steel fully threaded rod, hot dipped galvanized, a 5/8 in diameter, 11 threads per inch, in 12-foot lengths, in cardboard tubes.

Product 5.--Alloy steel fully threaded rod, produced to ASTM A193 Grade B7, a 3/4 inch diameter, 10 threads per inch, in 12-foot lengths, in cardboard tubes.

Product 6.--Alloy steel fully threaded rod, produced to ASTM A193 Grade B7, a 1-1/4 inch diameter, 8 threads per inch, in 12-foot lengths, in cardboard tubes.[14]

Five U.S. producers[15] and 30 importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.[16] Pricing data reported by these firms accounted for 21.2 percent of U.S. producers' shipments of threaded rod and 23.4 percent of U.S. shipments of subject imports in 2018. Reported pricing data accounted for 4.3 percent of imports from China,[17] 37.8 percent of imports from India, 30.0 percent of imports from Taiwan, and 46.3 percent of imports from Thailand in 2018.

Price data for products 1-6 are presented in tables V-3 to V-8 and figures V-2 to V-7.

[14] Staff removed price data submitted by *** for pricing product 6 imported from China because prices submitted were two to four times greater than other prices submitted. The firm stated that ***.

Staff removed price data submitted by *** for pricing products 1 and 2 imported from India and China, respectively, because the data did not adhere to the pricing product definitions and prices were anomalous.

[15] Consistent with the trade and financial data, staff ***. See Parts III and VI for additional information.

[16] 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.

[17] Petitioner suggested that pricing coverage for imports from China is lower than for the other subject countries because there is already an existing antidumping order on carbon threaded rod, which represented four of the six pricing products. Petitioner's posthearing brief, *Answers to Commissioner Questions*, pp. 1-2.

Table V-3
Threaded rod: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by quarters, January 2016-June 2019

Period	United States		China			India		
	Price (dollars per pound)	Quantity (pounds)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2016: Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2017: Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2018: Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2019: Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***

Period	Taiwan			Thailand		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2016: Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2017: Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018: Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019: Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***

Note: Product 1 Low-carbon steel fully threaded rod, electroplated with zinc, a 3/8 in diameter, 16 threads per inch, in 10-foot lengths, in cardboard tubes.
Source: Compiled from data submitted in response to Commission questionnaires.

Table V-4
Threaded rod: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by quarters, January 2016-June 2019

Period	United States		China			India		
	Price (dollars per pound)	Quantity (pounds)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2016: Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2017: Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2018: Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2019: Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***

Period	Taiwan			Thailand		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2016: Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2017: Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018: Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019: Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***

Note: Product 2 Low-carbon steel fully threaded rod, electroplated with zinc, a 1/2 in diameter, 13 threads per inch, in 10-foot lengths, in cardboard tubes.
Source: Compiled from data submitted in response to Commission questionnaires.

Table V-5
Threaded rod: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by quarters, January 2016-June 2019

Period	United States		China			India		
	Price (dollars per pound)	Quantity (pounds)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2016: Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2017: Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2018: Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2019: Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***

Period	Taiwan			Thailand		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2016: Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2017: Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018: Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019: Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***

Note: Product 3 Low-carbon steel fully threaded rod, electroplated with zinc, a 3/4 in diameter, 10 threads per inch, in 12-foot lengths, in cardboard tubes.
Source: Compiled from data submitted in response to Commission questionnaires.

Table V-6
Threaded rod: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by quarters, January 2016-June 2019

Period	United States		China			India		
	Price (dollars per pound)	Quantity (pounds)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2016: Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2017: Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2018: Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2019: Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***

Period	Taiwan			Thailand		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2016: Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2017: Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018: Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019: Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***

Note: Product 4 Low-carbon steel fully threaded rod, hot dipped galvanized, a 5/8 in diameter, 11 threads per inch, in 12-foot lengths, in cardboard tubes.
Source: Compiled from data submitted in response to Commission questionnaires.

Table V-7
Threaded rod: Weighted-average f.o.b. prices and quantities of domestic and imported product 5 and margins of underselling/(overselling), by quarters, January 2016-June 2019

Period	United States		China			India		
	Price (dollars per pound)	Quantity (pounds)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2016: Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2017: Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2018: Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2019: Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***

Period	Taiwan			Thailand		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2016: Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2017: Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018: Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019: Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***

Note: Product 5 Alloy steel fully threaded rod, produced to ASTM A193 Grade B7, a 3/4 inch diameter, 10 threads per inch, in 12-foot lengths, in cardboard tubes.
Source: Compiled from data submitted in response to Commission questionnaires.

Table V-8
Threaded rod: Weighted-average f.o.b. prices and quantities of domestic and imported product 6 and margins of underselling/(overselling), by quarters, January 2016-June 2019

Period	United States		China			India		
	Price (dollars per pound)	Quantity (pounds)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2016:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2017:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2018:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
2019:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***

Period	Taiwan			Thailand		
	Price (dollars per pound)	Quantity (pounds)	Margin (percent)	Price (dollars per pound)	Quantity (pounds)	Margin (percent)
2016:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2017:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2018:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
2019:						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***

Note: Product 6 Alloy steel fully threaded rod, produced to ASTM A193 Grade B7, a 1-1/4 inch diameter, 8 threads per inch, in 12-foot lengths, in cardboard tubes.
Source: Compiled from data submitted in response to Commission questionnaires.

Figure V-2
Threaded rod: Weighted-average prices and quantities of domestic and imported product 1, by quarters, January 2016-June 2019

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Figure V-3
Threaded rod: Weighted-average prices and quantities of domestic and imported product 2, by quarters, January 2016-June 2019

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Figure V-4
Threaded rod: Weighted-average prices and quantities of domestic and imported product 3, by quarters, January 2016-June 2019

* * * * * * *

Figure V-5
Threaded rod: Weighted-average prices and quantities of domestic and imported product 4, by quarters, January 2016-June 2019

* * * * * * *

Figure V-6
Threaded rod: Weighted-average prices and quantities of domestic and imported product 5, by quarters, January 2016-June 2019

* * * * * * *

Figure V-7
Threaded rod: Weighted-average prices and quantities of domestic and imported product 6, by quarters, January 2016-June 2019

* * * * * * *

Price trends

In general, prices increased for four of the six pricing products during January 2016-June 2019, while prices for products 3 and 4 showed mixed trends over the period. Table V-9 summarizes the price trends, by country and by product.

As shown in the table, domestic prices increased for all products, and ranged from *** percent to *** percent during January 2016-June 2019 while subject import price increases ranged from 7.1 percent to 47.1 percent for pricing products 1, 2, 3, 5, and 6. Subject import prices decreased for pricing product 4, ranging from 4.9 percent to 12.7 percent, and prices for product 3 from India decreased by *** percent while prices of product 3 from Taiwan and Thailand increased.

Petitioner Vulcan stated that its prices for alloy steel threaded rod are higher than its prices for carbon steel threaded rod, but that subject import prices for alloy steel threaded rod are often similar to its price of carbon steel threaded rod.[18]

[18] Hearing transcript, pp. 28, 48 (Black, Schagrin).

Table V-9
Threaded rod: Number of quarters containing observations low price, high price, and change in price over period, by product and source, January 2016 through June 2019

Item	Number of quarters	Low price (dollars per pound)	High price (dollars per pound)	Change in price over period (percent)
Product 1:				
United States	***	***	***	***
China	***	***	***	***
India	***	***	***	***
Taiwan	***	***	***	***
Thailand	***	***	***	***
Product 2:				
United States	***	***	***	***
China	***	***	***	***
India	***	***	***	***
Taiwan	***	***	***	***
Thailand	***	***	***	***
Product 3:				
United States	***	***	***	***
China	***	***	***	***
India	***	***	***	***
Taiwan	***	***	***	***
Thailand	***	***	***	***
Product 4:				
United States	***	***	***	***
China	***	***	***	***
India	***	***	***	***
Taiwan	***	***	***	***
Thailand	***	***	***	***
Product 5:				
United States	***	***	***	***
China	***	***	***	***
India	***	***	***	***
Taiwan	***	***	***	***
Thailand	***	***	***	***
Product 6:				
United States	***	***	***	***
China	***	***	***	***
India	***	***	***	***
Taiwan	***	***	***	***
Thailand	***	***	***	***

Note: Percentage change from the first quarter in which data were available in 2016 to the last quarter in which price data were available in 2019.

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

Price comparisons

As shown in table V-10, prices for product imported from subject countries were below those for U.S.-produced product in 189 of 271 instances (98.9 million pounds); margins of underselling ranged from 0.1 percent to 41.6 percent and averaged approximately 12.5 percent. In the remaining 82 instances (13.6 million pounds), prices for product from subject countries were between 0.1 percent and 45.9 percent above prices for the domestic product, averaging approximately 7.3 percent above domestic prices.[19]

[19] Prices for pricing product 3 show a different pattern, and prices were above those for U.S.-produced threaded rod in 40 of 50 instances (*** pounds).

Table V-10
Threaded rod: Instances of underselling/overselling and the range and average of margins, by product and by country, January 2016-June 2019

Source	Underselling				
	Number of quarters	Quantity (pounds)	Average margin (percent)	Margin Range (percent)	
				Min	Max
Product 1	***	***	***	***	***
Product 2	***	***	***	***	***
Product 3	***	***	***	***	***
Product 4	***	***	***	***	***
Product 5	***	***	***	***	***
Product 6	***	***	***	***	***
Total, underselling	**189**	**98,928,148**	**12.5**	**0.1**	**41.6**
China	***	***	***	***	***
India	***	***	***	***	***
Taiwan	***	***	***	***	***
Thailand	***	***	***	***	***
Total, underselling	**189**	**98,928,148**	**12.5**	**0.1**	**41.6**
Source	**(Overselling)**				
	Number of quarters	**Quantity (pounds)**	**Average margin (percent)**	**Margin Range (percent)**	
				Min	**Max**
Product 1	***	***	***	***	***
Product 2	***	***	***	***	***
Product 3	***	***	***	***	***
Product 4	***	***	***	***	***
Product 5	***	***	***	***	***
Product 6	***	***	***	***	***
Total, overselling	**82**	**13,620,347**	**(7.3)**	**(0.1)**	**(45.9)**
China	***	***	***	***	***
India	***	***	***	***	***
Taiwan	***	***	***	***	***
Thailand	***	***	***	***	***
Total, overselling	**82**	**13,620,347**	**(7.3)**	**(0.1)**	**(45.9)**

Note: 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 investigation, the Commission requested that U.S. producers of threaded rod report purchasers where they experienced instances of lost sales or revenue due to competition from imports of threaded rod from China, India, Taiwan, and/or Thailand during January 2016-December 2018. Of the seven responding U.S. producers, two (***) reported that they had to reduce prices and roll back announced price increases. These same two firms indicated that they had lost sales to imports from China,

India, Taiwan, and/or Thailand. One U.S. producer (***) submitted lost sales and lost revenue allegations. The responding U.S. producer identified 25 firms with which they lost sales or revenue (18 consisting of lost sales allegations, 4 consisting of lost revenue allegations, and 3 consisting of both types of allegations). One of the allegations involved China, 10 involved India, 18 involved Taiwan, and 3 involved Thailand. Responding purchasers reported purchasing increased quantities of threaded rod produced in the United States, China, and India while purchasing decreased quantities from Taiwan from 2016 to 2018.

In the final phase of the investigation, of the eight responding U.S. producers, three (***) reported that they had to reduce prices, two reported that they had to roll back announced price increases, and five reported that they did not need to reduce prices nor roll back price increases. Three U.S. producers reported that they had lost sales, and five reported that they had not.

Staff contacted 169 purchasers and received responses from 35 purchasers.[20] Responding purchasers reported purchasing over 357 million pounds of threaded rod during January 2016-June 2019 (table V-11).

As shown in tables V-12 and V-13, of the 35 responding purchasers, 22 reported that, since January 1, 2016, they had purchased imported threaded rod from subject countries instead of U.S.-produced product. Fourteen indicated they had done so for Chinese product, 14 for Indian product, 7 for Taiwan product, and 4 for Thai product. All 22 purchasers reported that subject import prices from at least one subject country were lower than U.S.-produced product, and 14 of these purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product. By subject country, six reported that price was a primary reason for purchasing Chinese product, nine for Indian product, four for Taiwan product, and one for Thai product. Ten purchasers estimated the quantity of threaded rod from subject countries purchased instead of domestic product; the total such quantity was 23.4 million pounds. Purchasers identified quality, availability, and the ability to make specific products as non-price reasons for purchasing imported rather than U.S.-produced product.

Six purchasers reported that U.S. producers had not had to reduce prices in order to compete with lower-priced subject imports, but one reported that they had reduced prices by 5 percent (table V-14; 28 reported that they did not know or they did not respond).

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[20] One relatively small purchaser (***) submitted lost sales lost revenue survey responses in the preliminary phase, but did not submit purchaser questionnaire responses in the final phase.

Table V-11
Threaded rod: Purchasers' responses to purchasing patterns

Purchaser	Purchases in January 2016-June 2019 (1,000 pounds)			Change in domestic share (pp, 2016-18)	Change in subject country share (pp, 2016-18)
	Domestic	Subject	All other[1]		
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
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***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
Total	**80,760**	**174,677**	**101,905**	**(1.6)**	**3.4**

Note: Includes all other sources and unknown sources.
Note: Percentage points (pp) change: Change in the share of the firm's total purchases of domestic and/or subject country imports between first and last years.

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

Table V-12
Threaded rod: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Purchaser	Purchased subject imports instead of domestic (Y/N)	Imports priced lower (Y/N)	If purchased imports instead of domestic, was price a primary reason		
			Y/N	If Yes, quantity purchased instead of domestic (1,000 pounds)	If No, non-price reason
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
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***	***	***	***	***	***
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***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued on next page.

Table V-12—Continued.
Threaded rod: Purchasers' responses to purchasing subject imports instead of domestic product

Purchaser	Purchased subject imports instead of domestic (Y/N)	Imports priced lower (Y/N)	If purchased imports instead of domestic, was price a primary reason		
			Y/N	If Yes, quantity purchased instead of domestic (1,000 pounds)	If No, non-price reason
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
Total	Yes--22; No--9	Yes--22; No--0	Yes--14; No--7	23,409	***

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

Table V-13
Threaded rod: Purchasers' responses to purchasing subject imports instead of domestic product, by country

Source	Count of purchasers reporting subject instead of domestic	Count of purchasers reported that imports were priced lower	Count of purchasers reporting that price was a primary reason for shift	Quantity subject purchased (1,000 pounds)
China	14	14	6	***
India	14	14	9	***
Taiwan	7	6	4	***
Thailand	4	3	1	***
Any subject source	22	22	14	23,409

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

Table V-14
Threaded rod: Purchasers’ responses to U.S. producer price reductions, by firm

Purchaser	U.S. producers reduced priced to compete with subject imports (Y/N)	If U.S. producers reduced prices	
		Estimated U.S. price reduction (percent)	Additional information, if available
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
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***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
Total / average	Yes--1; No--6	***	***

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

Part VI: Financial experience of U.S. producers

Background

Seven U.S. producers *** reported full or partial financial results data on their threaded rod operations. ***, which reported financial results for full-year 2016 through 2018 only, is not reflected in the U.S. industry's interim period financial results.[1] [2] With the exception of Vulcan, which is a division of SDI and part of that company's Steel Operations segment,[3] U.S. producers are privately held companies. On October 10-11, 2019, staff conducted a verification of the financial section of Vulcan's U.S. producer questionnaire, as well as selected elements of the trade and pricing sections. Data changes pursuant to verification are reflected in the relevant sections of this report.[4]

Notable changes in the character of U.S. threaded rod operations include SDI's acquisition of Vulcan in 2016 and Vulcan's subsequent acquisition of assets from Acme in 2017.[5] Currently, the purchased Acme assets remain in storage near Vulcan's production facility.[6]

Reflecting consolidation both prior to and during the period examined,[7] the U.S. industry's threaded rod sales are relatively concentrated with Vulcan accounting for ***

[1] *** did not respond to repeated staff requests that the company report its interim period threaded rod financial results. USITC auditor final-phase notes. *** and *** submitted U.S. producer questionnaires that were incorrect/incomplete with respect to reported financial information. In the absence of requested correction/clarification, these companies are not included in the U.S. industry's financial results. Ibid.

[2] *** reported its financial results on a tax basis. The remaining U.S. producers reported their financial results on the basis of generally accepted accounting principles (GAAP).

***.

[3] SDI 2018 10-K, pp. 6-7.

[4] Verification report, pp. 2-3.

[5] Conference transcript, p. 15 (Black). As noted in the *Cost of goods sold and gross profit or loss* section below, ***. *** U.S. producer questionnaire, response to III-10.

[6] Vulcan's decision not to deploy these assets reportedly reflects inadequate projected return on investment (ROI). Conference transcript, p. 22 (Black), pp. 57-58 (Black).

[7] Conference transcript, p. 30 (Black).

percent of total sales quantity in 2018. The remaining U.S. producers accounted for shares of total sales quantity ranging from *** percent (***) to *** percent (***) in 2018.

Operations on Threaded rod

Table VI-1 and table VI-2 present income-and-loss data for U.S. producers' operations on threaded rod and corresponding changes in average per pound values, respectively. Table VI-3 presents selected financial results information by firm.[8]

Revenue

The substantial majority (*** percent) of total threaded rod revenue represents commercial sales with relatively small amounts classified as transfers to related firms (*** percent) and internal consumption (*** percent).[9] Given the predominance of commercial sales, a single revenue line item is presented in the tables below.

Quantity

While the U.S. industry's total sales quantity increased in 2017 and then declined marginally in 2018, company-specific directional patterns and magnitudes of change varied (see table VI-3). In 2017, the overall increase in sales quantity was largely attributable to ***

[8] In general, the utility of the Commission's variance analysis is enhanced when product mix remains the same throughout the period. While Vulcan indicated that its product mix did not change substantially during 2016-18, Bay Standard indicated that its product mix did change to some extent. Conference transcript, p. 53 (Jenkins, Gross). Additionally, the pattern of the U.S. industry's average per pound sales values and costs reflects changes in company-specific market share (see footnote 15). Under these circumstances and since its utility appears to be limited, a variance analysis is not presented.

[9] *** accounted for all reported internal consumption and *** accounted for the majority of transfers to related firms. ***. Petitioner's postconference brief (Attachment 8). ***. *** U.S. producer questionnaire, response to II-11.

Table VI-1
Threaded rod: Results of operations of U.S. producers, 2016-18, January-June 2018, and January-June 2019

Item	Fiscal year			January to June	
	2016	2017	2018	2018	2019
	Quantity (1,000 pounds)				
Total net sales	133,135	142,591	142,414	68,173	64,732
	Value (1,000 dollars)				
Total net sales	98,213	108,187	121,906	56,638	60,306
Cost of goods sold.-- Raw materials	48,967	59,044	69,159	32,891	33,617
Direct labor	7,596	8,876	9,784	4,255	4,421
Other factory costs	13,907	16,563	17,338	8,079	7,889
Total COGS	70,470	84,482	96,280	45,225	45,927
Gross profit	27,743	23,704	25,626	11,414	14,379
SG&A expenses	14,318	14,125	14,044	6,436	6,542
Operating income or (loss)	13,425	9,579	11,582	4,978	7,837
Interest expense	***	***	***	***	***
All other expenses	***	***	***	***	***
All other income	***	***	***	***	***
Net income or (loss)	11,505	7,782	10,221	4,266	7,121
Depreciation/amortization	1,865	2,086	2,155	940	947
Cash flow	13,370	9,868	12,377	5,207	8,068
	Ratio to net sales (percent)				
Cost of goods sold.-- Raw materials	49.9	54.6	56.7	58.1	55.7
Direct labor	7.7	8.2	8.0	7.5	7.3
Other factory costs	14.2	15.3	14.2	14.3	13.1
Average COGS	71.8	78.1	79.0	79.8	76.2
Gross profit	28.2	21.9	21.0	20.2	23.8
SG&A expenses	14.6	13.1	11.5	11.4	10.8
Operating income or (loss)	13.7	8.9	9.5	8.8	13.0
Net income or (loss)	11.7	7.2	8.4	7.5	11.8

Table continued on next page.

Table VI-1—Continued
Threaded rod: Results of operations of U.S. producers, 2016-18, January-June 2018, and January-June 2019

Item	Fiscal year			January to June	
	2016	2017	2018	2018	2019
	Ratio to total COGS (percent)				
Cost of goods sold.-- Raw materials	69.5	69.9	71.8	72.7	73.2
Direct labor	10.8	10.5	10.2	9.4	9.6
Other factory costs	19.7	19.6	18.0	17.9	17.2
	Unit value (dollars per pound)				
Total net sales	0.738	0.759	0.856	0.831	0.932
Cost of goods sold.-- Raw materials	0.368	0.414	0.486	0.482	0.519
Direct labor	0.057	0.062	0.069	0.062	0.068
Other factory costs	0.104	0.116	0.122	0.119	0.122
Average COGS	0.529	0.592	0.676	0.663	0.709
Gross profit	0.208	0.166	0.180	0.167	0.222
SG&A expenses	0.108	0.099	0.099	0.094	0.101
Operating income or (loss)	0.101	0.067	0.081	0.073	0.121
Net income or (loss)	0.086	0.055	0.072	0.063	0.110
	Number of firms reporting				
Operating losses	---	---	---	---	---
Net losses	---	***	---	---	---
Data[1]	7	7	7	6	6

[1] *** did not report interim period financial results (see footnote 1).

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

Table VI-2
Threaded rod: Changes in average per pound values, 2016-18, January-June 2018, and January-June 2019

Item	Between fiscal years			Between partial year period
	2016-18	2016-17	2017-18	2018-19
	Change in AUVs (dollars per pound)			
Total net sales	0.1183	0.0210	0.0973	0.1008
Cost of goods sold.-- Raw materials	0.1178	0.0463	0.0715	0.0369
Direct labor	0.0116	0.0052	0.0065	0.0059
Other factory costs	0.0173	0.0117	0.0056	0.0034
Average COGS	0.1467	0.0632	0.0836	0.0461
Gross profit	(0.0284)	(0.0421)	0.0137	0.0547
SG&A expenses	(0.0089)	(0.0085)	(0.0004)	0.0067
Operating income or (loss)	(0.0195)	(0.0337)	0.0141	0.0480
Net income or (loss)	(0.0146)	(0.0318)	0.0172	0.0474

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

Table VI-3
Threaded rod: Results of operations of U.S. producers, by firm, 2016-18, January-June 2018, and January-June 2019

Item	Fiscal year			January to June	
	2016	2017	2018	2018	2019
	Total net sales (1,000 pounds)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Total net sales quantity	133,135	142,591	142,414	68,173	64,732
	Total net sales (1,000 dollars)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Total net sales value	98,213	108,187	121,906	56,638	60,306
	Cost of goods sold (1,000 dollars)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Total cost of goods sold	70,470	84,482	96,280	45,225	45,927
	Gross profit or (loss) (1,000 dollars)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Total gross profit or (loss)	27,743	23,704	25,626	11,414	14,379

Table continued on next page.

Table VI-3—Continued
Threaded rod: Results of operations of U.S. producers, by firm, 2016-18, January-June 2018, and January-June 2019

Item	Fiscal year			January to June	
	2016	2017	2018	2018	2019
	SG&A expenses (1,000 dollars)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Total SG&A expenses	14,318	14,125	14,044	6,436	6,542
	Operating income or (loss) (1,000 dollars)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Total operating income or (loss)	13,425	9,579	11,582	4,978	7,837
	Net income or (loss) (1,000 dollars)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Total net income or (loss)	11,505	7,782	10,221	4,266	7,121
	COGS to net sales ratio (percent)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Average COGS to net sales ratio	71.8	78.1	79.0	79.8	76.2

Table continued on next page.

Table VI-3—Continued
Threaded rod: Results of operations of U.S. producers, by firm, 2016-18, January-June 2018, and January-June 2019

Item	Fiscal year			January to June	
	2016	2017	2018	2018	2019
	Gross profit or (loss) to net sales ratio (percent)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Average gross profit or (loss) to net sales ratio	28.2	21.9	21.0	20.2	23.8
	SG&A expense to net sales ratio (percent)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Average SG&A expense to net sales ratio	14.6	13.1	11.5	11.4	10.8
	Operating income or (loss) to net sales ratio (percent)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Average operating income or (loss) to net sales ratio	13.7	8.9	9.5	8.8	13.0
	Net income or (loss) to net sales ratio (percent)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Average net income or (loss) to net sales ratio	11.7	7.2	8.4	7.5	11.8

Table continued on next page.

Table VI-3—Continued
Threaded rod: Results of operations of U.S. producers, by firm, 2016-18, January-June 2018, and January-June 2019

Item	Fiscal year			January to June	
	2016	2017	2018	2018	2019
	Unit net sales value (dollars per pound)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Average unit net sales value	0.74	0.76	0.86	0.83	0.93
	Unit raw materials (dollars per pound)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Average unit raw materials	0.37	0.41	0.49	0.48	0.52
	Unit direct labor (dollars per pound)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Average unit direct labor	0.06	0.06	0.07	0.06	0.07
	Unit other factory costs (dollars per pound)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Average unit other factory costs	0.10	0.12	0.12	0.12	0.12

Table continued on next page.

Table VI-3—Continued
Threaded rod: Results of operations of U.S. producers, by firm, 2016-18, January-June 2018, and January-June 2019

Item	Fiscal year			January to June	
	2016	2017	2018	2018	2019
	Unit COGS (dollars per pound)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Average unit COGS	0.53	0.59	0.68	0.66	0.71

[1] *** did not report interim period financial results (see footnote 1).
[2] *** did not separarately report direct labor. Costs associated with direct labor are included in *** other factory costs.

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

and *** with *** and *** reporting only modest increases in sales quantity.[10] In 2018, in contrast, the pattern of essentially stable sales quantity was attributable largely to the increase in sales quantity reported by ***, which partially offset *** large decline in sales quantity subsequent to ***. *** and *** also reported increases in total sales quantity in 2018.[11] The industry's total sales quantity was lower in January-June 2019 compared to

[10] ***. E-mail from *** to USITC staff, March 18, 2019.
[11] ***. Petitioner's postconference brief (Attachment 8).
***. E-mail with attachment (revised IIII-9a and III-13) from *** to USITC staff, March 13, 2019.

January-June 2018, reflecting lower sales quantity of varying magnitudes reported by all companies except *** and ***.[12] [13]

Value

In conjunction with the overall increase in sales quantity in 2017 and higher average per pound sales value in 2017 and 2018, the U.S. industry's total revenue increased throughout the full-year period (10.2 percent in 2016-17 and 12.7 percent in 2017-18). Notwithstanding lower total sales quantity in January-June 2019 compared to January-June 2018, total revenue was 6.5 percent higher in January-June 2019 due to higher average per pound sales value.[14]

On a company-specific basis and with some exceptions, average per pound sales values were in a similar range. As shown in table VI-3, *** average per pound sales values, which reflect ***, were the highest throughout the period, while the lowest average per pound sales values were reported by ***, ***), and ***.

While the U.S. industry's average per pound sales value increased throughout the period, underlying company-specific average per pound sales values reflect a mix of declines and increases with no uniform directional pattern reported.[15] Several U.S. producers confirmed

[12] While absolute revenue quantity amounts for the interim period would be higher with the inclusion of *** (see footnote 1), the directional pattern of lower overall sales quantity in January-June 2019 compared to January-June 2018 would be the same.

[13] ***. E-mail with attachment from *** to USITC staff, September 19, 2019.

[14] While absolute revenue value amounts for the interim period would be higher with the inclusion of *** (see footnote 1), the directional pattern of higher overall sales value in January-June 2019 compared to January-June 2018 would be the same.

[15] Changes in the industry's average per pound sales value, in part, reflect changes in company-specific market share. For example, the increase in the U.S. industry's average per pound sales value in 2017 largely reflects the increased market share of ***, which reported the second highest average per pound sales value throughout the period, and the lower market share of ***, which reported the lowest average per pound sales value in 2016 and 2017. ***. USITC auditor preliminary-phase notes.

that the directional pattern of average sales value reflects changes in the cost of material inputs.[16]

Cost of goods sold and gross profit or loss

Raw materials

Total raw material cost, which primarily represents steel wire rod and steel bar, accounts for the largest share of threaded rod total COGS, ranging from 69.5 percent in 2016 to 73.2 percent in January-June 2019.[17] As shown in table VI-1 and table VI-2, the increasing share of raw material cost to total COGS generally reflects period-to-period increases in average per pound raw material costs, which exceeded corresponding increases in average per pound direct labor and other factory costs.[18]

Differences in company-specific average per pound raw material costs appear to reflect, at least in part, the extent to which steel bar and/or steel wire rod is consumed as a primary input. U.S. producers, for the most part, reported the same directional pattern of higher average per pound raw material costs throughout the period.[19]

[16] ***. Petitioner's postconference brief (Attachment 8).
***. E-mail with attachment (revised IIII-9a and III-13) from *** to USITC staff, March 13, 2019.
[17] ***. Petitioner's postconference brief (Answers to Staff Questions, p. 5).
[18] ***. *** U.S. producer questionnaire, response to III-7. At the staff conference, a Vulcan company official stated, ". . . the majority of our steel purchases come from suppliers other than SDI because they have freight advantages." Conference transcript (Black), p. 18.
[19] ***. Petitioner's postconference brief (Attachment 8).
***. E-mail with attachment (revised IIII-9a and III-13) from *** to USITC staff, March 13, 2019.

Direct labor and other factory costs

Other factory costs represent the second largest component of COGS, ranging from 17.2 percent of total COGS in January-June 2019 to 19.7 percent in 2016. On an overall basis, average per pound other factory costs increased 11.2 percent in 2017 and 4.8 percent in 2018. Table VI-3 shows that U.S. producers were mixed in terms of the directional pattern of average per pound other factory costs; e.g., while *** reported higher average other factory costs between 2016-17, ***, ***, and *** reported lower other factory costs. As a practical matter, the U.S. industry's pattern of higher average per pound other factory costs in 2017 and 2018 is largely attributable to *** and ***, respectively.[20] [21]

Direct labor, the smallest component of COGS, ranged from 9.4 percent of total COGS in January-June 2018 to 10.8 percent in 2016. On a company-specific basis and similar to the pattern of other factory costs, U.S. producers reported a mixed directional pattern with respect to changes in average per pound direct labor cost. The overall increase in the U.S. industry's

[20] ***. Petitioner's postconference brief (Attachment 8). ***. Ibid. ***. *** U.S. producer questionnaire, response to III-10. Petitioner's postconference brief (Attachment 8).

[21] ***. USITC auditor notes (preliminary phase).

average per pound direct labor costs, like the pattern of other factory costs, *** reflects increases reported by *** and ***.[22]

Cost of goods sold

Principally due to increases in average per pound raw material cost, the U.S. industry's average per pound COGS increased throughout the period. To a lesser extent, higher average per pound conversion costs (direct labor and other factory costs) also contributed to this pattern.[23] With some exceptions, U.S. producers reported increasing average per pound COGS of varying magnitudes throughout the period.

Gross profit or loss

On an absolute basis and as a ratio to net sales, the U.S. industry's total gross profit was at its highest level in 2016. In 2017 and 2018, gross profit ratios (total gross profit divided by total revenue) declined, reflecting higher average per pound COGS that increased faster than corresponding average per pound sales value. While total revenue increased in 2017, the deterioration in gross profit ratio yielded lower total gross profit in that year. In conjunction with a continued increase in revenue and a smaller decline in gross profit ratio, the U.S. industry's total gross profit increased in 2018. January-June 2019 total gross profit was higher compared to January-June 2018, reflecting a combination of higher sales quantity and improved gross profit ratio. As shown in table VI-2, the improvement in January-June 2019 gross profit ratio generally reflects a higher average per pound sales value, which more than offset corresponding higher average per pound COGS.

While company-specific gross profit (on absolute basis and as a ratio of sales) fluctuated, table VI-3 shows that *** U.S. producers generated positive gross profit throughout the period. *** financial performance, however, was different inasmuch as it was the *** U.S. producer to report consecutive and pronounced declines in its gross profit ratio.

[22] ***. Petitioner's postconference brief (Attachment 8).
[23] ***. *** U.S. producer questionnaire, response to III-10.

SG&A expenses and operating income or loss

The U.S. industry's total SG&A expenses declined to its lowest level in 2017 and then, in conjunction with marginally lower sales quantity, declined somewhat in 2018. Total SG&A expenses were modestly higher in January-June 2019 compared to January-June 2018. Corresponding SG&A expense ratio (total SG&A expenses divided by total revenue) declined throughout the full-year period and was lower in January-June 2019 compared to January-June 2018, principally reflecting increases in total revenue.

Table VI-3 shows that U.S. producers reported a relatively wide range of SG&A expense ratios that were mixed in terms of directional pattern and magnitudes of change.[24] While several other U.S. producers also reported lower SG&A expense ratios in 2017, the decline reported by *** in that year was notable.[25]

To the extent that the U.S. industry's overall SG&A expense ratios declined during the period, the impact on operating results was positive inasmuch as it partially offset the negative impact of lower gross profit ratios during the full-year period and modestly amplified the positive impact of higher gross profit in January-June 2019 compared to January-June 2018. While magnitudes and directional patterns varied, *** U.S. producers reported positive operating income throughout the period.[26]

Interest expense, other expenses and income, and net income or loss

*** included non-recurring items as components of COGS and SG&A expenses (see footnotes 20, 23, 24). In contrast, *** reported non-recurring items as

[24] ***. *** U.S. producer questionnaire, response to III-10. ***. Ibid.

[25] ***. Petitioner's postconference brief (Attachment 8).

[26] ***.

part of other expenses below operating results.[27] Table VI-1 shows that, in conjunction with changes in total interest expense and net other income and expenses, the difference between the U.S. industry's operating and net results narrowed during the full-year period and was marginally greater in January-June 2019 compared to January-June 2018. Directionally, operating and net results followed the same underlying pattern throughout the period.

Capital expenditures and research and development expenses

Table VI-4 presents U.S. producers' capital expenditures and research and development (R&D) expenses related to their threaded rod operations.

Table VI-4
Threaded rod: Capital expenditures and research and development (R&D) expenses of U.S. producers, 2016-18, January-June 2018, and January-June 2019

Item	Fiscal year			January to June	
	2016	2017	2018	2018	2019
	Capital expenditures (1,000 dollars)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Total capital expenditures	***	***	***	***	***
	Research and development expenses (1,000 dollars)				
Acme	***	***	***	***	***
All Ohio	***	***	***	***	***
All-Pro	***	***	***	***	***
B&G	***	***	***	***	***
Bay Standard	***	***	***	***	***
Highland	***	***	***	***	***
Vulcan	***	***	***	***	***
Total research and development expenses	***	***	***	***	***

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

[27] ***. *** U.S. producer questionnaires (preliminary and final phase), responses to III-10.

*** accounted for the substantial majority of total reported capital expenditures (*** percent),[28] followed by *** (*** percent),[29] *** (*** percent),[30] and *** (*** percent).[31] ***, *** and *** reported no capital expenditures during the period.

***, the *** company to report R&D expenses during the period, reported relatively modest amounts that were for automation initiatives related to its continuing operations.[32]

Assets and return on assets

Table VI-5 presents data on the U.S. producers' total net assets and selected company-specific operating return on net assets related to operations on threaded rod.[33] [34]

[28] ***. *** U.S. producer questionnaire, response to III-13 (note 1). ***. Verification report, p. 5.

[29] ***. *** U.S. producer questionnaire, responses to III-13 (note 1).

[30] ***. *** U.S. producer questionnaire, response to III-13 (note 1).

[31] ***. *** U.S. producer questionnaire, response to III-13 (note 1). While its overall threaded rod capacity *** during the period, Bay Standard eliminated a production line dedicated to small diameter threaded rod. Conference transcript, p. 25 (Gross).

[32] *** U.S. producer questionnaire, response to III-13 (note 2).

[33] With respect to a company's overall operations, staff notes that a total asset value (i.e., the bottom line value on the asset side of a company's balance sheet) reflects an aggregation of a number of current and non-current assets, which, in many instances, are not product specific. The ability of U.S. producers to assign total asset values to discrete product lines affects the meaningfulness of operating return on net assets.

[34] ***, which reported no assets in its initial questionnaire response, did not provide requested total asset information in response to staff follow-up questions. While *** reported total asset information, the amounts appear anomalous given unusually high calculated asset turnover ratios (total revenue divided by total assets), as well as total asset amounts that were less than estimated ending inventory values. USITC auditor final-phase notes. Given these issues, table VI-5 does not present the corresponding operating return on assets of *** or ***.

Table VI-5
Threaded rod: U.S. producers' total net assets and operating return on assets, 2016-18

Firm	Fiscal years		
	2016	2017	2018
	Total net assets (1,000 dollars)		
Acme	***	***	***
All Ohio	***	***	***
All-Pro	***	***	***
B&G	***	***	***
Bay Standard	***	***	***
Highland	***	***	***
Vulcan	***	***	***
Total net assets	51,023	47,154	49,967
	Operating return on assets (percent)		
Acme	***	***	***
All Ohio	***	***	***
All-Pro	***	***	***
B&G	***	***	***
Bay Standard	***	***	***
Highland	***	***	***
Vulcan	***	***	***
Average operating return on assets[2]	23.5	15.4	16.3

[1] ***. For the reasons described in footnote 34, the operating return on assets of *** and *** are *** presented in this table.
[2] ***.

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

Capital and investment

The Commission requested the U.S. producers of threaded rod to describe any actual or potential negative effects on their return on investment or its growth, investment, ability to raise capital, existing development and production efforts (including efforts to develop a derivative or more advanced version of the product), or the scale of capital investments as a result of imports of threaded rod from China, India, Taiwan and/or Thailand. Table VI-6 tabulates the responses on actual negative effects on investment, growth and development, as well as anticipated negative effects.[35] Table VI-7 presents the narrative responses of the U.S. producers regarding actual and anticipated negative effects on investment, growth and development.

[35] As indicated in footnote 1, *** are not included in the industry's financial results. As applicable, however, their responses to questions regarding actual and anticipated negative effects due to subject imports are included in table VI-6 and table VI-7.

Table VI-6
Threaded rod: Negative effects of imports from subject sources on investment, growth, and development since January 1, 2016

Item	No	Yes
Negative effects on investment	6	3
Cancellation, postponement, or rejection of expansion projects		1
Denial or rejection of investment proposal		0
Reduction in the size of capital investments		0
Return on specific investments negatively impacted		3
Other		1
Negative effects on growth and development	6	3
Rejection of bank loans		0
Lowering of credit rating		0
Problem related to the issue of stocks or bonds		0
Ability to service debt		1
Other		2
Anticipated negative effects of imports	5	4

[1] While *** submitted an affirmative response regarding anticipated negative effects due to subject imports, its narrative response regarding this issue (see table VI-7) suggests that its response could have been "no." The company did not respond to staff follow-up questions requesting clarification.

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

Table VI-7
Threaded rod: Narrative responses of U.S. producers regarding actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2016

Effects/Firm	Narrative
Impact on investment	
Cancellation, postponement, or rejection of expansion projects:	
***	***
Return on specific investments negatively impacted:	
***	***
***	***
***	***

Table continued on next page.

Table VI-7—Continued
Threaded rod: Narrative responses of U.S. producers regarding actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2016

Effects/Firm	Narrative
Impact on investment--continued	
Other:	
***	***
Impact on growth and development	
Ability to service debt:	
***	***
Other:	
***	***
***	***
Anticipated effects of imports:	
***	***
***	***
***	***
***	***

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

Part VII: Threat considerations and information on nonsubject countries

Section 771(7)(F)(i) of the Act (19 U.S.C. § 1677(7)(F)(i)) provides that—

> *In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors*[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*

[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."

effect on domestic prices, and are likely to increase demand for further imports,

(V) inventories of the subject merchandise,

(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

[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."

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.

The industry in China

The Commission issued foreign producers' or exporters' questionnaires to 211 firms believed to produce and/or export threaded rod from China.[3] None of these firms submitted data in response to the questionnaire.[4]

IFI & Morgan Ltd. ("IFI"), a company with Taiwanese and Chinese production, claims to have exported merchandise to the United States since 1987. IFI operates at least four production plants: in Ningbo, Shanghai, Haiyan, and one in Taiwan.[5] IFI claims that its merchandise are produced to ASTM standards for threaded rod products. Listed ASTM standards include: A193, A307, A449, and others. IFI's catalogue of merchandise includes: threaded studs, nuts, bolts, washers, screws, and other miscellaneous products.[6]

Ningbo Zhongjiang High Strength Bolts Co., Ltd ("Zhongjiang"), a major producer and exporter of threaded rod and a mandatory respondent in the corresponding Commerce antidumping investigation,[7] was established in 1998 and is headquartered and has operations in Ningbo. Zhongjiang manufactures various kinds of high strength bolts, nuts, and threaded rod, with a reported yearly capacity of 30,000 tons. Zhongjiang lists that its merchandise are produced to ASTM standards for threaded rod products. Listed ASTM standards include A193 B7/B7M, A193 B16, and A320. Zhongjiang is reportedly export-focused; their markets include Europe, North America, the Middle East, and Southeast Asia.[8]

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[3] These firms were identified through a review of information submitted in the petition and contained in *** records.

[4] Three firms, *** submitted certified responses that the companies did not produce/export subject threaded rod to the United States.

[5] IFI & Morgan, "Team", http://www.ifi-fasteners.com/e/content/content_e.asp?content_id=62, accessed October 18, 2019. See also petitioner's prehearing brief at pp. 23-24.

[6] IFI & Morgan, "Product", http://www.ifi-fasteners.com/e/content/content_e.asp?content_id=64, accessed October 18, 2019.

[7] *Alloy and Certain Carbon Steel Threaded Rod From the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination and Extension of Provisional Measures*, 84 FR 50379, September 25, 2019.

[8] Ningbo Zhongjiang High Strength Bolts Co., Ltd., "About Us", http://www.zhongjiangfstn.com/en/about.html, accessed October 11, 2019.

Zhejiang Junyue Standard Part Co., Ltd. ("Junyue") is another major producer of threaded rod and mandatory respondent in the corresponding Commerce antidumping investigation.[9] Junyue produces only threaded rod; the company's reported monthly production of threaded rod can reach 5,000 tons. The company reports to have 125 sets of wire rolling machines, 2 electroplating lines, and 2 heat treatment lines with a length of 12 meters. Junyue is also mainly export-focused; their markets include the United States, Germany, Japan, Spain, Australia, and Canada.[10]

Exports

According to GTA, the leading export markets for threaded screws and bolts (HS subheading 7318.15),[11] a category which contains threaded rod and out-of-scope products, from China are the United States, Russia, and Japan (table VII-1). During 2018, the United States was the top export market for threaded rod from China, accounting for 22.3 percent, followed by Russia, accounting for 6.8 percent.

[9] 84 FR 50379

[10] Zhejiang Junyue Standard Part Co., Ltd., "Company Profile", https://www.zj-junyue.com/about/company-profile.html#whyus, accessed October 11, 2019.

[11] The full description for product classified in HS 7318.15 is "threaded screws and bolts nesoi, with or without their nuts or washers, of iron or steel."

Table VII-1
Threaded screws and bolts: China exports by destination market, 2016-18

Destination market	Calendar year		
	2016	2017	2018
	Quantity (1,000 pounds)		
United States	672,406	681,381	798,520
Russia	187,433	209,528	243,282
Japan	166,091	169,044	164,062
Germany	57,211	105,108	115,501
Australia	85,833	99,635	101,674
Mexico	79,747	75,325	88,254
South Korea	89,535	96,493	83,866
Vietnam	65,318	66,247	82,239
India	67,035	59,311	82,138
All other destination markets	1,466,852	1,608,471	1,818,932
Total exports	2,937,461	3,170,543	3,578,467
	Value (1,000 dollars)		
United States	441,721	483,227	646,064
Russia	96,058	113,956	166,145
Japan	126,251	135,557	143,752
Germany	38,237	69,329	96,106
Australia	62,615	85,444	101,674
Mexico	53,786	56,244	72,109
South Korea	61,956	69,557	67,528
Vietnam	73,514	66,872	93,013
India	57,957	61,043	88,914
All other destination markets	1,130,315	1,259,581	1,598,081
Total exports	2,142,409	2,400,810	3,073,385

Table continued on next page.

Table VII-1--Continued
Threaded screws and bolts: China exports by destination market, 2016-18

Destination market	Calendar year		
	2016	2017	2018
	Unit value (dollars per pound)		
United States	0.66	0.71	0.81
Russia	0.51	0.54	0.68
Japan	0.76	0.80	0.88
Germany	0.67	0.66	0.83
Australia	0.73	0.86	1.00
Mexico	0.67	0.75	0.82
South Korea	0.69	0.72	0.81
Vietnam	1.13	1.01	1.13
India	0.86	1.03	1.08
All other destination markets	0.77	0.78	0.88
Total exports	0.73	0.76	0.86
	Share of quantity (percent)		
United States	22.9	21.5	22.3
Russia	6.4	6.6	6.8
Japan	5.7	5.3	4.6
Germany	1.9	3.3	3.2
Australia	2.9	3.1	2.8
Mexico	2.7	2.4	2.5
South Korea	3.0	3.0	2.3
Vietnam	2.2	2.1	2.3
India	2.3	1.9	2.3
All other destination markets	49.9	50.7	50.8
Total exports	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7318.15 as reported by China Customs in the Global Trade Atlas database, accessed September 16, 2019.

The industry in India

The Commission issued foreign producers' or exporters' questionnaires to seven firms believed to produce and/or export threaded rod from India.[12] Usable responses to the Commission's questionnaire were received from four firms: Goodgood Manufacturers, Kanika Exports, Maharaja International, and Mangal Steel. These firms' exports to the United States accounted for 41.8 percent of U.S. imports of threaded rod from India in 2018.[13] Table VII-2 presents information on the threaded rod operations of the responding producers and exporters in India.

Table VII-2
Threaded rod: Summary data for producers in India, 2018

Firm	Production (1,000 pounds)	Share of reported production (percent)	Exports to the United States (1,000 pounds)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds)	Share of firm's total shipments exported to the United States (percent)
Goodgood	***	***	***	***	***	***
Kanika	***	***	***	***	***	***
Maharaja	***	***	***	***	***	***
Mangal	***	***	***	***	***	***
Total	***	***	***	***	***	***

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

Maharaja International (Maharaja) is a major Indian producer and exporter of fastener products, including threaded rod, nuts, and bolts.[14] Maharaja has obtained "Export House" status under the Government of India's Status Holder Scheme, which is reserved for Indian firms that have excelled in international trade and have successfully contributed to the country's foreign trade.

[12] These firms were identified through a review of information submitted in the petition and contained in *** records.

[13] Calculated using questionnaire response for the numerator and official U.S. import statistics using statistical reporting numbers 7318.15.5051, 7318.15.5056, and 7318.15.5090, accessed September 23, 2019, for the denominator.

[14] Maharaja International Inc., "About Us", http://www.maharajaindia.com/about-threaded_rods-bolts_nuts-pipe_supports-manufacturer-exporter-from-ludhiana-punjab-india.html, accessed September 26, 2019.

Mangal Steel is a major producer of threaded rod in India. According to its website, the company imported advanced thread rolling machinery from the United States in order to produce threaded rods and studs up to 2 inches' diameter and 20 feet in length.[15] Mangal Steel has also obtained "Export House" status and has received awards for "Highest Exporter with Continuous Excellence" under the Government of India's Status Holder Scheme, which is reserved for Indian firms that have excelled in international trade and have successfully contributed to the country's foreign trade.

Kanika Exports (subsidiary of Kanika Group of Companies) is another major Indian producer of threaded rods, in addition to coil rods, hex nuts, and other fastener products. This company supplies customers in Europe, the Middle East, and Asia (Kanika Export's website claims these regions serve as a "special export market base"), as well as firms in the United States and Canada.[16] Kanika's threaded rod products are produced to ASTM A36 and A307 and have a diameter ranging from ¼ inch to 2 inches (produced from low carbon steel).[17]

Goodgood Manufacturers is an Indian producer and exporter of threaded rod, in addition to nuts, bolts, construction fasteners, copper washers, automobile parts, and ducting accessories. According to its website, the company is ISO 9001:2008 certified.[18]

[15] Mangal Steel, "Performance," http://www.steelmangal.com/performance.htm, (accessed September 20, 2019); Federation of Indian Export Organizations, "Promotional Schemes," https://www.fieo.org/view_section.php?lang=0&id=0,30,1700, (accessed September 20, 2019).

[16] Kanika Exports, "Clients/Exports," https://www.kanikagroup.in/high-tensile-fasteners-manufacturers-india-certifications.html, (accessed October 30, 2019).

[17] Kanika Exports, "Threaded Rods/Bars," https://www.kanikagroup.in/threaded-rods-manufacturers-exporters-india.html, (accessed October 30, 2019).

[18] Goodgood Manufacturers, "Profile", https://www.indiamart.com/goodgood-manufacturers/profile.html, (accessed September 26, 2019).

Changes in operations

As shown in table VII-3, producers in India reported several operational and/or organizational changes since January 1, 2016.

Table VII-3
Threaded rod: Reported changes in operations by producers in India, since January 1, 2016

Item / Firm	Reported changed in operations
Expansions:	
***	***
***	***
Revised labor agreements:	
***	***
***	***

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

Operations on threaded rod

Table VII-4 presents information on the threaded rod operations of the responding producers and exporters in India. While capacity increased during 2016-18 by *** percent, production decreased during the same period by *** percent.

Table VII-4
Threaded rod: Data for producers in India, 2016-18, January to June 2018, January to June 2019, and projected 2019 and 2020

Item	Actual experience					Projections	
	Calendar year			January to June		Calendar year	
	2016	2017	2018	2018	2019	2019	2020
	Quantity (1,000 pounds)						
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Shipments:							
Home market shipments:							
Internal consumption/ transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
	Ratios and shares (percent)						
Capacity utilization	***	***	***	***	***	***	***
Inventories/production	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***
Share of shipments:							
Home market shipments:							
Internal consumption/ transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***

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

Alternative products

As shown in table VII-5, *** responding Indian firms produced other products on the same equipment and machinery used to produce threaded rod. These other products included anchor bolts, pipe hangers, stainless steel threaded rod, and truss rods.

Table VII-5
Threaded rod: Indian producers' overall capacity and production on the same equipment as subject production, 2016-18, January-June 2018, January-June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Quantity (1,000 pounds)				
Overall capacity	***	***	***	***	***
Production: Threaded rod	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***
	Ratios and shares (percent)				
Overall capacity utilization	***	***	***	***	***
Share of production: Threaded rod	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***

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

Exports

According to GTA, the leading export markets for threaded screws and bolts (HS subheading 7318.15), a category which contains threaded rod and out-of-scope products, from India are Germany, the United Kingdom, and the Netherlands, each accounting for 15.1 percent, 13.9 percent, and 10.7 percent during 2018, respectively (table VII-6). During 2018, the United States was the fifth largest export market for threaded rod from India, accounting for 5.5 percent.

Table VII-6
Threaded screws and bolts: India exports by destination market, 2016-18

Destination market	Calendar year		
	2016	2017	2018
	Quantity (1,000 pounds)		
United States	15,837	12,550	15,200
Germany	38,353	38,251	41,343
United Kingdom	40,440	36,763	38,163
Netherlands	47,296	37,284	29,346
Saudi Arabia	11,839	14,199	15,943
Italy	21,800	20,670	15,114
United Arab Emirates	11,135	12,761	11,944
Poland	9,599	8,605	9,893
Spain	15,707	8,624	8,211
All other destination markets	78,247	77,054	89,329
Total exports	290,251	266,761	274,486
	Value (1,000 dollars)		
United States	21,489	19,338	24,136
Germany	39,495	44,323	53,030
United Kingdom	29,657	27,510	30,557
Netherlands	44,406	39,895	39,896
Saudi Arabia	7,525	9,314	11,177
Italy	22,744	23,106	20,503
United Arab Emirates	9,709	10,113	11,563
Poland	5,622	5,173	7,610
Spain	10,977	7,942	9,391
All other destination markets	67,108	70,968	85,535
Total exports	258,733	257,682	293,396

Table continued on the next page.

Table VII-6--Continued
Threaded screws and bolts: India exports by destination market, 2016-18

Destination market	Calendar year		
	2016	2017	2018
	Unit value (dollars per pound)		
United States	1.36	1.54	1.59
Germany	1.03	1.16	1.28
United Kingdom	0.73	0.75	0.80
Netherlands	0.94	1.07	1.36
Saudi Arabia	0.64	0.66	0.70
Italy	1.04	1.12	1.36
United Arab Emirates	0.87	0.79	0.97
Poland	0.59	0.60	0.77
Spain	0.70	0.92	1.14
All other destination markets	0.86	0.92	0.96
Total exports	0.89	0.97	1.07
	Share of quantity (percent)		
United States	5.5	4.7	5.5
Germany	13.2	14.3	15.1
United Kingdom	13.9	13.8	13.9
Netherlands	16.3	14.0	10.7
Saudi Arabia	4.1	5.3	5.8
Italy	7.5	7.7	5.5
United Arab Emirates	3.8	4.8	4.4
Poland	3.3	3.2	3.6
Spain	5.4	3.2	3.0
All other destination markets	27.0	28.9	32.5
Total exports	100.0	100.0	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2018 data.

Source: Official exports statistics under HS subheading 7318.15 as reported by Ministry of Commerce in the Global Trade Atlas database, accessed September 16, 2019.

The industry in Taiwan

The Commission issued foreign producers' or exporters' questionnaires to six firms believed to produce and/or export threaded rod from Taiwan.[19] A usable response to the Commission's questionnaire was received from one firm: Ta Chen Stainless Pipe Co., Ltd ("Ta Chen").[20] This firm's exports to the United States accounted for approximately *** percent of U.S. imports of threaded rod from Taiwan in 2018.[21] According to the estimate requested of the Ta Chen, the production of threaded rod in Taiwan reported in its questionnaire accounts for approximately *** percent of overall production of threaded rod in Taiwan. Table VII-7 presents information on the threaded rod operations of the responding producers and exporters in Taiwan.

[19] These firms were identified through a review of information submitted in the petition and contained in *** records.

[20] An additional firm, ***.

[21] Calculated using questionnaire response for the numerator and official U.S. import statistics using statistical reporting numbers 7318.15.5051, 7318.15.5056, and 7318.15.5090, accessed September 23, 2019, for the denominator.

Table VII-7
Threaded rod: Summary data for Ta Chen in Taiwan, 2018

Firm	Production (1,000 pounds)	Share of reported production (percent)	Exports to the United States (1,000 pounds)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds)	Share of firm's total shipments exported to the United States (percent)
Ta Chen	***	***	***	***	***	***
Total	***	***	***	***	***	***

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

Ta Chen is one of Taiwan's and the world's leading producers of steel, aluminum, duplex, and nickel alloy products. The firm's Taiwan operations have the following production capabilities: 3,000 metric tons a month for welded pipe; 1,100 tons per month for structural tubing; 650 tons per month for flat bar; 180 tons per month for butt-weld fittings; and 100 tons per month for valves.[22] Ta Chen also has operations in Canada, China, and the United States, and the company is a major supplier to customers in Europe and the United States. [23] Ta Chen ***.[24]

Quintain Steel Co., Ltd. is a producer of carbon and alloy wire products and threaded rod in Taiwan, and ***. The company supplies ball thread[25] and v-thread[26] threaded rod to Taiwanese and foreign customers and has a total annual capacity of 400,000 metric tons at its manufacturing facility in Tainan City, Taiwan.[27]

Super Cheng, a producer of alloy steel threaded rod in Taiwan, sells product with a variety of finishes, including plain, zinc plated, and special coating, and ***

[22] Ta Chen International Inc., https://www.tachen.com/location_TW.asp, (accessed October 30, 2019).

[23] Ta Chen International Inc., "About Us," https://www.tachen.com/aboutus.asp, (accessed March 28, 2019).

[24] Ta Chen's Foreign Producer Questionnaire Response to questions II-3e and II-10.

[25] Ball thread generally refers to ball screws that have an ogival shape ('gothic' arch) thread formed from two arcs of the same radius. Nook, "Ball Screw Thread Form Terms," http://www.nookindustries.com/LinearLibraryItem/Ball_Screw_Thread_Form_Terms, (accessed March 22, 2019).

[26] V-thread refers to screws that have a thread angle of 60 degrees.

[27] Public data for threaded rod as a share of total production were not readily available. Quintain Steel Co., Ltd., "Products," http://www.quintain.com.tw/products-3_62113-english.html, (accessed March 20, 2019).

***. According to the company's website, Super Cheng has expanded its business into threaded rods, bolts, and sockets in recent years and exports over 90 percent of its products to customers in the United States, Canada, and Europe. The company has three manufacturing facilities throughout Taiwan, and two of these facilities possess wire-drawing, material storage, and threaded rod manufacturing capabilities.[28]

Changes in operations

Responding Taiwan producer, Ta Chen, reported *** operational or organizational changes.

Operations on threaded rod

Table VII-8 presents information on the threaded rod operations of Ta Chen. Capacity and production increased from *** short tons to almost *** short tons from 2017 to 2018, or by *** percent, but were *** percent lower in interim 2019 than in interim 2018. They are projected to increase by *** percent from 2018 to 2019, and are projected to *** from 2019 to 2020. *** (*** to *** percent between 2017 and 2018) of Ta Chen's total shipments consisted of exports, *** were to the United States.[29] Exports to the United States increased by *** percent from 2017 to 2018, but were *** percent lower in interim 2019 than in interim 2018. Exports to the United States are projected to increase from 2018 to 2019 by *** percent, and are projected to decrease by *** percent from 2019 to 2020.

[28] The company's website does not specify if threaded rod is produced at the third facility. Super Cheng Industrial Co. LTD, "About Super Cheng," https://superchengco.com/about-us, (accessed October 30, 2019).

[29] Ta Chen ***. Ta Chen's Foreign Producer Questionnaire response to question II-3d and II-3e.

Table VII-8
Threaded rod: Data for producers in Taiwan, 2016-18, January to June 2018, January to June 2019, and projected 2019 and 2020

Item	Actual experience					Projections	
	Calendar year			January to June		Calendar year	
	2016	2017	2018	2018	2019	2019	2020
	Quantity (1,000 pounds)						
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Shipments:							
Home market shipments:							
Internal consumption/ transfers	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
	Ratios and shares (percent)						
Capacity utilization	***	***	***	***	***	***	***
Inventories/production	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***
Share of shipments:							
Home market shipments:							
Internal consumption/ transfers	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***

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

Alternative products

Ta Chen reported *** being produced on the same machinery used to produce threaded rod, ***.

Exports

According to GTA, the leading export markets for threaded screws and bolts (HS subheading 7318.15), a category which contains threaded rod and out-of-scope products, from Taiwan are the United States, Germany, and Japan (table VII-9). During 2018, the United States was the top export market for threaded rod from Taiwan, accounting for 42.8 percent, followed by Germany and Japan, accounting for 9.8 percent and 5.4 percent, respectively.

Table VII-9
Threaded screws and bolts: Taiwan exports by destination market, 2016-18

Destination market	Calendar year		
	2016	2017	2018
	Quantity (1,000 pounds)		
United States	731,495	777,659	851,543
Germany	178,498	186,968	195,052
Japan	95,155	103,528	107,437
United Kingdom	87,847	82,014	77,040
Netherlands	67,929	68,319	71,284
Canada	40,657	54,783	61,745
Italy	46,313	46,666	49,762
Poland	44,793	47,309	48,130
Spain	30,634	29,567	35,139
All other destination markets	477,101	483,260	491,326
Total exports	1,800,423	1,880,073	1,988,457
	Value (1,000 dollars)		
United States	755,926	869,613	1,003,281
Germany	179,369	210,622	246,121
Japan	111,871	129,154	144,845
United Kingdom	90,010	98,364	97,421
Netherlands	75,328	86,256	95,834
Canada	44,296	58,093	71,282
Italy	42,639	49,989	55,659
Poland	31,980	35,581	41,065
Spain	27,018	29,597	37,220
All other destination markets	559,643	627,884	682,124
Total exports	1,918,080	2,195,153	2,474,852

Table continued on next page.

Table VII-9--Continued
Threaded screws and bolts: Taiwan exports by destination market, 2016-18

Destination market	Calendar year		
	2016	2017	2018
	Unit value (dollars per pound)		
United States	1.03	1.12	1.18
Germany	1.00	1.13	1.26
Japan	1.18	1.25	1.35
United Kingdom	1.02	1.20	1.26
Netherlands	1.11	1.26	1.34
Canada	1.09	1.06	1.15
Italy	0.92	1.07	1.12
Poland	0.71	0.75	0.85
Spain	0.88	1.00	1.06
All other destination markets	1.17	1.30	1.39
Total exports	1.07	1.17	1.24
	Share of quantity (percent)		
United States	40.6	41.4	42.8
Germany	9.9	9.9	9.8
Japan	5.3	5.5	5.4
United Kingdom	4.9	4.4	3.9
Netherlands	3.8	3.6	3.6
Canada	2.3	2.9	3.1
Italy	2.6	2.5	2.5
Poland	2.5	2.5	2.4
Spain	1.7	1.6	1.8
All other destination markets	26.5	25.7	24.7
Total exports	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7318.15 as reported by Taiwan Directorate General of Customs in the Global Trade Atlas database, accessed September 16, 2019.

The industry in Thailand

The Commission issued foreign producers' or exporters' questionnaires to five firms believed to produce and/or export threaded rod from Thailand.[30] The Commission did not receive a foreign producer/exporter questionnaire from any firms in Thailand.

Tycoons Worldwide Group (Thailand) Public Co. Ltd. is a major Thai producer of threaded, wire rod, reinforcing bar, annealed wire, and other steel products and is believed to be the sole midstream to downstream vertically integrated producer of these products in

[30] These firms were identified through a review of information submitted in the petition and contained in *** records.

Thailand. All of Tycoon's production takes place at the company's Rayong, Thailand facility. In 2017, Tycoon estimated its annual production capacity for steel wire rod, annealed wire, screws, and bolts at 360,000 metric tons, 144,000 metric tons, 17,108 metric tons, and 36,000 metric tons, respectively.[31]

Tong Heer Fasteners, a subsidiary of TONG Group, is another producer of steel bolts, screws, stud bolts, and threaded rods in Thailand. The firm opened its Chon Buri, Thailand operations in 2005, and supplies customers in the solar energy, petrochemical, machine assembling, food machinery, telecommunication, and construction industries.[32]

Exports

According to GTA, the leading export markets for threaded screws and bolts (HS subheading 7318.15),[33] a category which contains threaded rod and out-of-scope products, from Thailand are the Germany, the United States, and the United Kingdom (table VII-10). Germany, the United States, and the United Kingdom accounted for 20.2 percent, 18.5 percent, and 8.4 percent of exports from Thailand during 2018, respectively.

[31] No specific breakout was provided for threaded rod. Tycoons Worldwide Group, "Investor Relations: Annual Report 2017," http://ir.tycons.com/english/meeting/agm2018/5annual_report_3_E.pdf, (accessed March 20, 2019), p. 1.

[32] Tong Heer Fasteners Co. Sdn. Bhd., "Products", http://www.tong.com.my/thailand/product.html (accessed October 30, 2019); Tong Herr Resources Berhad, "History and Businesses," http://www.tong.com.my/corporate/history_business.html, (accessed October 30, 2019).

[33] The full description for product classified in HS 7318.15 is "threaded screws and bolts nesoi, with or without their nuts or washers, of iron or steel."

Table VII-10
Threaded screws and bolts: Thailand exports by destination market, 2016-18

Destination market	Calendar year		
	2016	2017	2018
	Quantity (1,000 pounds)		
United States	35,098	38,225	48,737
Germany	49,484	44,350	53,343
United Kingdom	16,960	19,192	22,200
Netherlands	13,260	18,289	18,233
India	11,758	14,588	17,556
Italy	27,885	17,663	17,081
Indonesia	10,039	11,113	10,658
Japan	6,883	6,422	6,998
Argentina	4,200	5,249	6,140
All other destination markets	52,603	60,547	62,831
Total exports	228,170	235,639	263,778
	Value (1,000 dollars)		
United States	32,850	41,809	60,359
Germany	29,400	26,572	38,368
United Kingdom	10,955	12,167	18,387
Netherlands	7,663	13,441	16,609
India	28,143	34,887	41,768
Italy	21,264	15,308	15,889
Indonesia	20,310	23,988	27,164
Japan	12,666	12,414	15,763
Argentina	8,728	12,204	15,049
All other destination markets	91,287	103,392	111,711
Total exports	263,266	296,183	361,067

Table continued on next page.

Table VII-10--Continued
Threaded screws and bolts: Thailand exports by destination market, 2016-18

Destination market	Calendar year		
	2016	2017	2018
	Unit value (dollars per pound)		
United States	0.94	1.09	1.24
Germany	0.59	0.60	0.72
United Kingdom	0.65	0.63	0.83
Netherlands	0.58	0.73	0.91
India	2.39	2.39	2.38
Italy	0.76	0.87	0.93
Indonesia	2.02	2.16	2.55
Japan	1.84	1.93	2.25
Argentina	2.08	2.32	2.45
All other destination markets	1.74	1.71	1.78
Total exports	1.15	1.26	1.37
	Share of quantity (percent)		
United States	15.4	16.2	18.5
Germany	21.7	18.8	20.2
United Kingdom	7.4	8.1	8.4
Netherlands	5.8	7.8	6.9
India	5.2	6.2	6.7
Italy	12.2	7.5	6.5
Indonesia	4.4	4.7	4.0
Japan	3.0	2.7	2.7
Argentina	1.8	2.2	2.3
All other destination markets	23.1	25.7	23.8
Total exports	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7318.15 as reported by Thai Customs Department in the Global Trade Atlas database, accessed September 16, 2019.

Subject countries combined

Table VII-11 presents summary data on threaded rod operations of the reporting subject producers in the subject countries.

Table VII-11
Threaded rod: Data on the industry in subject countries, 2016-18, January to June 2018, January to June 2019, and projected 2019 and 2020

Item	Actual experience					Projections	
	Calendar year			January to June		Calendar year	
	2016	2017	2018	2018	2019	2019	2020
	Quantity (1,000 pounds)						
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Shipments:							
Home market shipments:							
Internal consumption/ transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
	Ratios and shares (percent)						
Capacity utilization	***	***	***	***	***	***	***
Inventories/production	***	***	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***	***	***
Share of shipments:							
Home market shipments:							
Internal consumption/ transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	***	***	***	***	***	***	***
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***

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

U.S. inventories of imported merchandise

Table VII-12 presents data on U.S. importers' reported inventories of threaded rod. During 2016-18, inventories of imported threaded rod from China decreased by *** percent, while inventories of threaded rod from India, Taiwan, and Thailand increased by *** percent, and *** percent, and *** percent, respectively. As a whole, inventories of threaded rod from subject countries increased by *** percent during 2016-18.

Table VII-12
Threaded rod: U.S. importers' inventories, 2016-18, January to June 2018, January to June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Inventories (1,000 pounds); Ratios (percent)				
Imports from China Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from India: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from Taiwan: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from Thailand: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from all subject sources: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from all nonsubject sources: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from all sources: Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***

Note: Staff notes that ***.

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

U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of threaded rod from China, India, Thailand, and/or Taiwan after June 30, 2019. Their reported data is presented in table VII-13.

Table VII-13
Threaded rod: U.S. importers' arranged imports, July 2019-June 2020

Item	Period				
	Jul-Sept 2019	Oct-Dec 2019	Jan-Mar 2020	Apr-Jun 2020	Total
	Quantity (1,000 pounds)				
U.S. imports from.--					
China	***	***	***	***	***
India	***	***	***	***	***
Taiwan	***	***	***	***	***
Thailand	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

Antidumping or countervailing duty orders in third-country markets

Questionnaire responses reported no countervailing or antidumping duty orders on threaded rod from China, India, Taiwan, and Thailand other than the antidumping order on U.S. imports of carbon threaded rod from China (Inv. No. 731-A-1145). A review of quarterly notifications to the World Trade Organization's Committee on Anti-Dumping Practices found no additional orders on the subject product in third-country markets.[34]

Information on nonsubject countries

Table VII-14 presents the leading exporters of threaded screws and bolts (HS 7318.15),[35] which includes threaded rod and out-of-scope products, from 2016 to 2018. Total world exports of threaded screws and bolts increased by 10.2 percent between 2017 and 2018. China

[34] World Trade Organization, "Anti-dumping," https://www.wto.org/english/tratop_e/adp_e/adp_e.htm, (accessed August 29, 2019).

[35] The full description for product classified in HS 7318.15 is "threaded screws and bolts nesoi, with or without their nuts or washers, of iron or steel."

accounted for the largest share of global exports, by value, in 2018 (15.3 percent), followed by Germany (15.0 percent), and Taiwan (12.3 percent).

Table VII-14
Threaded screws and bolts: Global exports by exporter, 2016-18

Exporter	Calendar year		
	2016	2017	2018
	Value (1,000 dollars)		
United States	2,033,969	2,087,145	2,045,584
China	2,142,409	2,400,810	3,073,385
India	258,733	257,682	293,396
Taiwan	1,918,080	2,195,153	2,474,852
Thailand	263,266	296,183	361,067
Subject countries	4,582,488	5,149,828	6,202,700
Germany	2,504,393	2,758,730	3,013,306
Japan	1,491,961	1,572,629	1,632,991
Italy	1,110,235	1,226,090	1,334,057
France	532,610	606,234	691,546
Netherlands	447,176	554,113	551,886
Korea	526,046	506,617	519,314
All other exporters	3,423,377	3,748,190	4,084,780
Total	16,652,255	18,209,575	20,076,163
	Share of value (percent)		
United States	12.2	11.5	10.2
China	12.9	13.2	15.3
India	1.6	1.4	1.5
Taiwan	11.5	12.1	12.3
Thailand	1.6	1.6	1.8
Subject countries	27.5	28.3	30.9
Germany	15.0	15.1	15.0
Japan	9.0	8.6	8.1
Italy	6.7	6.7	6.6
France	3.2	3.3	3.4
Netherlands	2.7	3.0	2.7
Korea	3.2	2.8	2.6
All other exporters	20.6	20.6	20.3
Total	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7318.15 reported by various national statistical authorities in the Global Trade Atlas database, accessed September 16, 2019.

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
84 FR 6817, February 28, 2019	*Carbon and Alloy Steel Threaded Rod From China, India, Taiwan, and Thailand; Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations*	https://www.govinfo.gov/content/pkg/FR-2019-02-28/pdf/2019-03450.pdf
84 FR 10034, March 19, 2019	*Carbon and Alloy Steel Threaded Rod From India, Taiwan, Thailand, and the People's Republic of China: Initiation of Less-Than-Fair-Value Investigations*	https://www.govinfo.gov/content/pkg/FR-2019-03-19/pdf/2019-05136.pdf
84 FR 10040, March 19, 2019	*Carbon and Alloy Steel Threaded Rod From India and the People's Republic of China: Initiation of Countervailing Duty Investigations*	https://www.govinfo.gov/content/pkg/FR-2019-03-19/pdf/2019-05138.pdf
84 FR 14971, April 12, 2019	*Carbon and Alloy Steel Threaded Rod From China, India, Taiwan, and Thailand; Affirmative Preliminary Determination and Commencement of Final Phase Investigations*	https://www.govinfo.gov/content/pkg/FR-2019-04-12/pdf/2019-07246.pdf

84 FR 17379, April 25, 2019	*Carbon and Alloy Steel Threaded Rod From India and the People's Republic of China: Postponement of Preliminary Determinations in the Countervailing Duty Investigations*	https://www.govinfo.gov/content/pkg/FR-2019-04-25/pdf/2019-08345.pdf
84 FR 27764, June 14, 2019	*Carbon and Alloy Steel Threaded Rod from India, Taiwan, and the People's Republic of China: Postponement of Preliminary Determinations in the Less-Than-Fair-Value Investigations*	https://www.govinfo.gov/content/pkg/FR-2019-06-14/pdf/2019-12604.pdf
84 FR 36570, July 29, 2019	*Carbon and Alloy Steel Threaded Rod From India: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination*	https://www.govinfo.gov/content/pkg/FR-2019-07-29/pdf/2019-16037.pdf
84 FR 36578, July 29, 2019	*Carbon and Alloy Steel Threaded Rod From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination*	https://www.govinfo.gov/content/pkg/FR-2019-07-29/pdf/2019-16036.pdf
84 FR 38597, August 7, 2019	*Carbon and Alloy Steel Threaded Rod From Thailand: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Affirmative Determination of Critical Circumstances*	https://www.govinfo.gov/content/pkg/FR-2019-08-07/pdf/2019-16888.pdf

84 FR 44916, August 27, 2019	*Carbon and Alloy Steel Threaded Rod From China, India, Taiwan, and Thailand; Scheduling of the Final Phase of Countervailing and Anti-Dumping Duty Investigations*	https://www.govinfo.gov/content/pkg/FR-2019-08-27/pdf/2019-18421.pdf
84 FR 50379, September 25, 2019	*Alloy and Certain Carbon Steel Threaded Rod from the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination and Extension of Provisional Measures*	https://www.govinfo.gov/content/pkg/FR-2019-09-25/pdf/2019-20810.pdf
84 FR 50376, September 25, 2019	*Carbon and Alloy Steel Threaded Rod From India: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures*	https://www.govinfo.gov/content/pkg/FR-2019-09-25/pdf/2019-20811.pdf
84 FR 50382, September 25, 2019	*Carbon and Alloy Steel Threaded Rod From Taiwan: Preliminary Affirmative Determination of Sales at Less Than Fair Value*	https://www.govinfo.gov/content/pkg/FR-2019-09-25/pdf/2019-20812.pdf
84 FR 50382, September 25, 2019	*Carbon and Alloy Steel Threaded Rod From Taiwan: Preliminary Affirmative Determination of Sales at Less Than Fair Value*	https://www.govinfo.gov/content/pkg/FR-2019-09-25/pdf/2019-20812.pdf
84 FR 56162, October 21, 2019	*Carbon and Alloy Steel Threaded Rod from Thailand: Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances*	https://www.govinfo.gov/content/pkg/FR-2019-10-21/pdf/2019-22866.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 Threaded Rod from China, India, Taiwan, and Thailand

Inv. Nos.: 701-TA-618-619 and 731-TA-1441-1444 (Final)

Date and Time: October 15, 2019 - 9:30 a.m.

A session was held in connection with these investigations in the Main Hearing Room (Room 101), 500 E Street, SW., Washington, DC.

OPENING REMARKS:

Petitioner (**Luke A. Meisner**, Schagrin Associates)

In Support of the Imposition of Antidumping and Countervailing Duty Orders:

Schagrin Associates
Washington, DC
on behalf of

Vulcan Threaded Products, Inc.

Christopher Graham, Senior Vice President, Long Product Group

Dennis Black, General Manager, Vulcan Threaded Products, Inc.

Alan Logan, Customer Service Manager, Vulcan Threaded Products, Inc.

Brent Jenkins, Bar Mill Product & Marketing Manager, Vulcan Threaded Products, Inc.

Walter Gross, President, Bay Standard Manufacturing, Inc.

Paul Diorio, President, Dan-Loc Group

Roger B. Schagrin)
Elizabeth J. Drake) – OF COUNSEL
Luke A. Meisner)

CLOSING REMARKS:

Petitioner (**Roger B. Schagrin**, Schagrin Associates)

-END-

APPENDIX C

SUMMARY DATA

All producers

Table C-1

Threaded rod: Summary data concerning the U.S. market, 2016-18, January to June 2018, and January to June 2019

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

	Reported data					Period changes			
	Calendar year			January to June		Calendar year			Jan-Jun
	2016	2017	2018	2018	2019	2016-18	2016-17	2017-18	2018-19
U.S. consumption quantity:									
Amount	354,680	394,751	444,476	204,251	228,791	▲25.3	▲11.3	▲12.6	▲12.0
Producers' share (fn1)	37.5	36.3	32.1	36.0	30.7	▼(5.4)	▼(1.3)	▼(4.2)	▼(5.4)
Importers' share (fn1):									
China	17.9	23.8	30.0	25.5	27.1	▲12.1	▲5.9	▲6.2	▲1.6
India	17.2	17.8	16.7	17.3	20.8	▼(0.5)	▲0.6	▼(1.1)	▲3.5
Taiwan	11.9	9.7	10.1	10.1	10.4	▼(1.8)	▼(2.2)	▲0.4	▲0.3
Thailand	3.4	2.6	2.7	2.8	2.5	▼(0.8)	▼(0.8)	▲0.0	▼(0.3)
Subject sources	50.5	54.0	59.5	55.7	60.8	▲9.0	▲3.5	▲5.5	▲5.1
Nonsubject sources	12.0	9.8	8.4	8.3	8.5	▼(3.6)	▼(2.2)	▼(1.3)	▲0.3
All import sources	62.5	63.7	67.9	64.0	69.3	▲5.4	▲1.3	▲4.2	▲5.4
U.S. consumption value:									
Amount	330,711	368,884	443,856	201,988	236,363	▲34.2	▲11.5	▲20.3	▲17.0
Producers' share (fn1)	29.9	29.7	27.6	30.1	27.2	▼(2.3)	▼(0.2)	▼(2.1)	▼(2.8)
Importers' share (fn1):									
China	15.6	19.9	26.3	22.7	24.8	▲10.7	▲4.3	▲6.3	▲2.1
India	8.0	8.7	9.0	8.9	10.9	▲0.9	▲0.7	▲0.3	▲2.0
Taiwan	13.1	13.1	12.2	12.6	11.5	▼(0.9)	▲0.0	▼(0.9)	▼(1.1)
Thailand	1.6	1.3	1.4	1.4	1.2	▼(0.2)	▼(0.2)	▲0.0	▼(0.2)
Subject sources	38.3	43.1	48.8	45.7	48.4	▲10.5	▲4.8	▲5.7	▲2.7
Nonsubject sources	31.9	27.2	23.6	24.2	24.4	▼(8.3)	▼(4.6)	▼(3.6)	▲0.2
All import sources	70.1	70.3	72.4	69.9	72.8	▲2.3	▲0.2	▲2.1	▲2.8
U.S. imports from:									
China:									
Quantity	63,613	93,971	133,300	52,150	62,059	▲109.6	▲47.7	▲41.9	▲19.0
Value	51,503	73,439	116,514	45,917	58,590	▲126.2	▲42.6	▲58.7	▲27.6
Unit value	$0.81	$0.78	$0.87	$0.88	$0.94	▲8.0	▼(3.5)	▲11.8	▲7.2
Ending inventory quantity	***	***	***	***	***	▼***	▼***	▲***	▲***
India									
Quantity	61,126	70,416	74,301	35,389	47,593	▲21.6	▲15.2	▲5.5	▲34.5
Value	26,516	32,026	39,741	18,011	25,809	▲49.9	▲20.8	▲24.1	▲43.3
Unit value	$0.43	$0.45	$0.53	$0.51	$0.54	▲23.3	▲4.8	▲17.6	▲6.5
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Taiwan									
Quantity	42,155	38,184	44,861	20,590	23,786	▲6.4	▼(9.4)	▲17.5	▲15.5
Value	43,350	48,481	54,191	25,465	27,142	▲25.0	▲11.8	▲11.8	▲6.6
Unit value	$1.03	$1.27	$1.21	$1.24	$1.14	▲17.5	▲23.5	▼(4.9)	▼(7.7)
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Thailand									
Quantity	12,096	10,415	11,783	5,617	5,695	▼(2.6)	▼(13.9)	▲13.1	▲1.4
Value	5,202	4,933	6,084	2,904	2,809	▲17.0	▼(5.2)	▲23.3	▼(3.3)
Unit value	$0.43	$0.47	$0.52	$0.52	$0.49	▲20.1	▲10.1	▲9.0	▼(4.6)
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▼***	▼***
Subject sources:									
Quantity	178,989	212,986	264,245	113,746	139,133	▲47.6	▲19.0	▲24.1	▲22.3
Value	126,570	158,878	216,530	92,297	114,349	▲71.1	▲25.5	▲36.3	▲23.9
Unit value	$0.71	$0.75	$0.82	$0.81	$0.82	▲15.9	▲5.5	▲9.8	▲1.3
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▲***
Nonsubject sources:									
Quantity	42,521	38,521	37,497	16,884	19,527	▼(11.8)	▼(9.4)	▼(2.7)	▲15.7
Value	105,335	100,476	104,728	48,969	57,667	▼(0.6)	▼(4.6)	▲4.2	▲17.8
Unit value	$2.48	$2.61	$2.79	$2.90	$2.95	▲12.7	▲5.3	▲7.1	▲1.8
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▼***
All import sources:									
Quantity	221,510	251,507	301,742	130,630	158,660	▲36.2	▲13.5	▲20.0	▲21.5
Value	231,905	259,354	321,258	141,265	172,016	▲38.5	▲11.8	▲23.9	▲21.8
Unit value	$1.05	$1.03	$1.06	$1.08	$1.08	▲1.7	▼(1.5)	▲3.2	▲0.3
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▲***

Table continued on next page.....

Table C-1--Continued
Threaded rod: Summary data concerning the U.S. market, 2016-18, January to June 2018, and January to June 2019
(Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year			January to June		Calendar year			Jan-Jun
	2016	2017	2018	2018	2019	2016-18	2016-17	2017-18	2018-19
U.S. producers':									
Average capacity quantity	275,234	256,762	253,520	126,484	126,855	▼(7.9)	▼(6.7)	▼(1.3)	▲0.3
Production quantity	133,905	139,807	147,144	74,910	70,340	▲9.9	▲4.4	▲5.2	▼(6.1)
Capacity utilization (fn1)	48.7	54.5	58.0	59.2	55.4	▲9.4	▲5.8	▲3.6	▼(3.8)
U.S. shipments:									
Quantity	133,170	143,244	142,734	73,621	70,131	▲7.2	▲7.6	▼(0.4)	▼(4.7)
Value	98,807	109,530	122,598	60,723	64,347	▲24.1	▲10.9	▲11.9	▲6.0
Unit value	0.74	0.76	0.86	0.82	0.92	▲15.8	▲3.1	▲12.3	▲11.2
Export shipments:									
Quantity	***	***	***	***	***	▲***	▼***	▲***	▲***
Value	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity	23,079	19,445	23,488	20,355	23,337	▲1.8	▼(15.7)	▲20.8	▲14.7
Inventories/total shipments (fn1)	***	***	***	***	***	▼***	▼***	▲***	▲***
Production workers	312	333	330	288	311	▲5.8	▲6.7	▼(0.9)	▲8.0
Hours worked (1,000s)	660	721	718	360	374	▲8.7	▲9.3	▼(0.5)	▲3.9
Wages paid ($1,000)	11,988	14,316	14,707	7,513	7,843	▲22.7	▲19.4	▲2.7	▲4.4
Hourly wages (dollars per hour)	$18.17	$19.85	$20.50	$20.88	$20.98	▲12.8	▲9.3	▲3.2	▲0.5
Productivity (pounds per hour)	202.9	193.9	205.1	208.2	188.2	▲1.1	▼(4.5)	▲5.8	▼(9.6)
Unit labor costs	$0.09	$0.10	$0.10	$0.10	$0.11	▲11.6	▲14.4	▼(2.4)	▲11.2
Net sales:									
Quantity	133,135	142,591	142,414	68,173	64,732	▲7.0	▲7.1	▼(0.1)	▼(5.0)
Value	98,213	108,187	121,906	56,638	60,306	▲24.1	▲10.2	▲12.7	▲6.5
Unit value	$0.74	$0.76	$0.86	$0.83	$0.93	▲16.0	▲2.8	▲12.8	▲12.1
Cost of goods sold (COGS)	70,470	84,482	96,280	45,225	45,927	▲36.6	▲19.9	▲14.0	▲1.6
Gross profit or (loss) (fn2)	27,743	23,704	25,626	11,414	14,379	▼(7.6)	▼(14.6)	▲8.1	▲26.0
SG&A expenses	14,318	14,125	14,044	6,436	6,542	▼(1.9)	▼(1.3)	▼(0.6)	▲1.7
Operating income or (loss) (fn2)	13,425	9,579	11,582	4,978	7,837	▼(13.7)	▼(28.6)	▲20.9	▲57.4
Net income or (loss) (fn2)	11,505	7,782	10,221	4,266	7,121	▼(11.2)	▼(32.4)	▲31.4	▲66.9
Capital expenditures	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit COGS	$0.53	$0.59	$0.68	$0.66	$0.71	▲27.7	▲11.9	▲14.1	▲7.0
Unit SG&A expenses	$0.11	$0.10	$0.10	$0.09	$0.10	▼(8.3)	▼(7.9)	▼(0.4)	▲7.1
Unit operating income or (loss) (fn2)	$0.10	$0.07	$0.08	$0.07	$0.12	▼(19.4)	▼(33.4)	▲21.0	▲65.8
Unit net income or (loss) (fn2)	$0.09	$0.05	$0.07	$0.06	$0.11	▼(16.9)	▼(36.8)	▲31.5	▲75.8
COGS/sales (fn1)	71.8	78.1	79.0	79.8	76.2	▲7.2	▲6.3	▲0.9	▼(3.7)
Operating income or (loss)/sales (fn1)	13.7	8.9	9.5	8.8	13.0	▼(4.2)	▼(4.8)	▲0.6	▲4.2
Net income or (loss)/sales (fn1)	11.7	7.2	8.4	7.5	11.8	▼(3.3)	▼(4.5)	▲1.2	▲4.3

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

fn1: Reported data are in percent and period changes are in percentage points.
fn2: Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using statistical reporting numbers 7318.15.5051,7318.15.5056 and 7318.15.5090 accessed September 23, 2019.

Related party exclusion

Table C-2

Threaded rod: Summary data concerning the U.S. market excluding three U.S. producers *, 2016-18, January to June 2018, and January to June 2019**

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

	Reported data					Period changes			
	Calendar year			January to June		Calendar year			Jan-Jun
	2016	2017	2018	2018	2019	2016-18	2016-17	2017-18	2018-19
U.S. consumption quantity:									
Amount	***	***	***	***	***	▲***	▲***	▲***	▲***
Producers' share (fn1):									
Included producers	***	***	***	***	***	▼***	▼***	▼***	▼***
Excluded producers	***	***	***	***	***	▲***	▲***	▲***	▼***
All producers	***	***	***	***	***	▼***	▼***	▼***	▼***
Importers' share (fn1):									
China	***	***	***	***	***	▲***	▲***	▲***	▲***
India	***	***	***	***	***	▼***	▲***	▼***	▲***
Taiwan	***	***	***	***	***	▼***	▼***	▲***	▲***
Thailand	***	***	***	***	***	▼***	▼***	▲***	▼***
Subject sources	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▼***	▼***	▼***	▲***
All import sources	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. consumption value:									
Amount	***	***	***	***	***	▲***	▲***	▲***	▲***
Producers' share (fn1):									
Included producers	***	***	***	***	***	▼***	▼***	▼***	▼***
Excluded producers	***	***	***	***	***	▲***	▲***	▼***	▼***
All producers	***	***	***	***	***	▼***	▼***	▼***	▼***
Importers' share (fn1):									
China	***	***	***	***	***	▲***	▲***	▲***	▲***
India	***	***	***	***	***	▲***	▲***	▲***	▲***
Taiwan	***	***	***	***	***	▼***	▲***	▼***	▼***
Thailand	***	***	***	***	***	▼***	▼***	▲***	▼***
Subject sources	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources	***	***	***	***	***	▼***	▼***	▼***	▲***
All import sources	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. imports from:									
China:									
Quantity	63,613	93,971	133,300	52,150	62,059	▲109.6	▲47.7	▲41.9	▲19.0
Value	51,503	73,439	116,514	45,917	58,590	▲126.2	▲42.6	▲58.7	▲27.6
Unit value	$0.81	$0.78	$0.87	$0.88	$0.94	▲8.0	▼(3.5)	▲11.8	▲7.2
Ending inventory quantity	***	***	***	***	***	▼***	▼***	▲***	▲***
India									
Quantity	61,126	70,416	74,301	35,389	47,593	▲21.6	▲15.2	▲5.5	▲34.5
Value	26,516	32,026	39,741	18,011	25,809	▲49.9	▲20.8	▲24.1	▲43.3
Unit value	$0.43	$0.45	$0.53	$0.51	$0.54	▲23.3	▲4.8	▲17.6	▲6.5
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Taiwan									
Quantity	42,155	38,184	44,861	20,590	23,786	▲6.4	▼(9.4)	▲17.5	▲15.5
Value	43,350	48,481	54,191	25,465	27,142	▲25.0	▲11.8	▲11.8	▲6.6
Unit value	$1.03	$1.27	$1.21	$1.24	$1.14	▲17.5	▲23.5	▼(4.9)	▼(7.7)
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▲***
Thailand									
Quantity	12,096	10,415	11,783	5,617	5,695	▼(2.6)	▼(13.9)	▲13.1	▲1.4
Value	5,202	4,933	6,084	2,904	2,809	▲17.0	▼(5.2)	▲23.3	▼(3.3)
Unit value	$0.43	$0.47	$0.52	$0.52	$0.49	▲20.1	▲10.1	▲9.0	▼(4.6)
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▼***	▼***
Subject sources:									
Quantity	178,989	212,986	264,245	113,746	139,133	▲47.6	▲19.0	▲24.1	▲22.3
Value	126,570	158,878	216,530	92,297	114,349	▲71.1	▲25.5	▲36.3	▲23.9
Unit value	$0.71	$0.75	$0.82	$0.81	$0.82	▲15.9	▲5.5	▲9.8	▲1.3
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▲***
Nonsubject sources:									
Quantity	42,521	38,521	37,497	16,884	19,527	▼(11.8)	▼(9.4)	▼(2.7)	▲15.7
Value	105,335	100,476	104,728	48,969	57,667	▼(0.6)	▼(4.6)	▲4.2	▲17.8
Unit value	$2.48	$2.61	$2.79	$2.90	$2.95	▲12.7	▲5.3	▲7.1	▲1.8
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▲***	▼***
All import sources:									
Quantity	221,510	251,507	301,742	130,630	158,660	▲36.2	▲13.5	▲20.0	▲21.5
Value	231,905	259,354	321,258	141,265	172,016	▲38.5	▲11.8	▲23.9	▲21.8
Unit value	$1.05	$1.03	$1.06	$1.08	$1.08	▲1.7	▼(1.5)	▲3.2	▲0.3
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▲***

Table C-2--Continued
Threaded rod: Summary data concerning the U.S. market excluding three U.S. producers *, 2016-18, January to June 2018, and January to June 2019**

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

	Reported data					Period changes			
	Calendar year			January to June		Calendar year			Jan-Jun
	2016	2017	2018	2018	2019	2016-18	2016-17	2017-18	2018-19
U.S. producers':									
Average capacity quantity	***	***	***	***	***	▼***	▼***	▼***	▲***
Production quantity	***	***	***	***	***	▲***	▲***	▲***	▼***
Capacity utilization (fn1)	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. shipments:									
Quantity	***	***	***	***	***	▲***	▲***	▼***	▼***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
Export shipments:									
Quantity	***	***	***	***	***	▲***	▼***	▲***	▲***
Value	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	▼***	▲***	▲***
Inventories/total shipments (fn1)	***	***	***	***	***	▼***	▼***	▲***	▲***
Production workers	***	***	***	***	***	▲***	▲***	▼***	▲***
Hours worked (1,000s)	***	***	***	***	***	▲***	▲***	▼***	▲***
Wages paid ($1,000)	***	***	***	***	***	▲***	▲***	▲***	▲***
Hourly wages (dollars per hour)	***	***	***	***	***	▲***	▲***	▲***	▲***
Productivity (pounds per hour)	***	***	***	***	***	▲***	▼***	▲***	▼***
Unit labor costs	***	***	***	***	***	▲***	▲***	▼***	▲***
Net sales:									
Quantity	***	***	***	***	***	▲***	▲***	▼***	▼***
Value	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
Cost of goods sold (COGS)	***	***	***	***	***	▲***	▲***	▲***	▲***
Gross profit or (loss) (fn2)	***	***	***	***	***	▼***	▼***	▲***	▲***
SG&A expenses	***	***	***	***	***	▼***	▼***	▼***	▲***
Operating income or (loss) (fn2)	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss) (fn2)	***	***	***	***	***	▼***	▼***	▲***	▲***
Capital expenditures	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit COGS	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit SG&A expenses	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit operating income or (loss) (fn2)	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit net income or (loss) (fn2)	***	***	***	***	***	▼***	▼***	▲***	▲***
COGS/sales (fn1)	***	***	***	***	***	▲***	▲***	▲***	▼***
Operating income or (loss)/sales (fn1)	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss)/sales (fn1)	***	***	***	***	***	▼***	▼***	▲***	▲***

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

fn1: Reported data are in percent and period changes are in percentage points.
fn2: Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using statistical reporting numbers 7318.15.5051,7318.15.5056 and 7318.15.5090 accessed September 23, 2019.

APPENDIX D

SECTION 301 PROCEEDINGS AND SECTION 232 PROCLAMATIONS

Table D-1
Section 301 tariff actions: Office of the United States Trade Representative ("USTR") proceedings, 2018-19.

Product list	Effective date	Tariff action
Tranche 1	July 6, 2018	**Enacted:** Additional 25 percent ad valorem duties on approximately $34 billion of imports classifiable under 818 HTS tariff subheadings (Annex A to 83 FR 28710).[1]
Tranche 2	August 23, 2018	**Enacted:** Additional 25 percent ad valorem duties on approximately $16 billion of imports classifiable under 279 HTS tariff subheadings (Annex A to 83 FR 40823).[2]
Tranche 3	September 24, 2018	**Enacted:** Additional 10 percent ad valorem duties on approximately $200 billion of imports classifiable under 5,745 HTS tariff subheadings and partial subheadings (Annex A to 83 FR 47974), which are scheduled to increase to 25 percent on January 1, 2019 (Annex B to 83 FR 47974).[3]
Tranche 3	October 1, 2018	**Amendment:** Fourteen HTS tariff subheadings in chapter 44 (under Annex A to 83 FR 47974, September 21, 2018) were removed and replaced by 38 corresponding new HTS subheadings to conform to the International Convention on the Harmonized Commodity Description and Coding System.[4]
Tranche 3	March 2, 2019	**Postponed:** Duty increases from 10 percent to 25 percent were rescheduled (83 FR 65198).[5]
Tranche 3	Not applicable	**Postponed:** Additional ad valorem duties to remain at 10 percent until further notice (84 FR 7966).[6]
Tranche 3	May 10, 2019	**Enacted:** Duty increases from 10 percent to 25 percent ad valorem were rescheduled (84 FR 20459).[7]
Tranche 3	Prior to June 1, 2019	**Enacted:** Delayed duty increases from 10 percent to 25 percent ad valorem enacted May 10, 2019 on certain products exported from China before May 10, 2019, that enter into the United States before June 1, 2019 (84 FR 21892).[8]
Tranche 3	Prior to June 15, 2019	**Enacted:** The date was extended for the delayed duty increase from 10 percent to 25 percent ad valorem on certain products exported from China before May 10, 2019 that enter into the United States before June 15, 2019.[9]

Continued.

[1] USTR, *Notice of Action and Request for Public Comment Concerning Proposed Determination of Action Pursuant to Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 FR 28710, June 20, 2018.

[2] USTR, *Notice of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 FR 40823, August 16, 2018.

[3] USTR, *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 FR 47974, September 21, 2018.

[4] USTR, *Conforming Amendment and Modification to Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 FR 49153, September 28, 2018.

[5] USTR, *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 FR 65198, December 19, 2018.

[6] USTR, *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 FR 7966, March 5, 2019.

[7] USTR, *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 FR 20459, May 9, 2019.

Tranche 4, List 1	September 1, 2019	**Enacted:** Additional 10 percent ad valorem duties on imports classifiable under 3,229 full HTS tariff subheadings and 4 partial HTS subheadings (Annexes A and B to 84 FR 43304). Imports on products classifiable under HTS subheadings on lists 1 and 2 totaled approximately $300 billion.[10]
Tranche 4, List 2	December 15, 2019	**Enacted:** Additional 10 percent ad valorem duties on imports classifiable under 542 full HTS tariff subheadings and 8 partial HTS subheadings (Annexes C and D to 84 FR 43304). Imports on products classifiable under HTS subheadings on lists 1 and 2 totaled approximately $300 billion.[10]
Tranche 4, List 1	September 1, 2019	**Amendment:** Additional 10 percent ad valorem duties were increased to 15 percent ad valorem on products covered by Annex A (84 FR 45821).[11]
Tranche 4, List 2	December 15, 2019	**Amendment:** Additional 10 percent ad valorem duties were increased to 15 percent ad valorem on products covered by Annex C (84 FR 45821).[11]
Tranches 1, 2, and 3	October 1, 2019	**Proposed:** Additional 25 percent ad valorem duties to be increased 30 percent ad valorem on products covered by Annex C – List 3, Part 1 (84 FR 46212).[12]
Tranches 1, 2, and 3	September 11, 2019	**Postponed:** Additional ad valorem duties to remain at 25 percent until October 15, 2019.[13]
Tranches 1, 2, 3, and 4	October 11, 2019	**Postponed:** Additional ad valorem duties to remain at 25 percent until further notice.[14]

[8] USTR, *Implementing Modification to Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 FR 21892, May 15, 2019

[9] USTR, *Request for Comments Concerning Proposed Modification of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation,* 84 FR 26930, June 10, 2019.

[10] USTR, *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 FR 43304, August 20, 2019.

[11] USTR, *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 FR 45821, August 30, 2019.

[12] USTR, *Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 FR 46212, September 3, 2019.

[13] "Trump Agrees to 2-Week Delay in China Tariff Increase," Associated Press, September 11, 2019, https://www.apnews.com/402432900d664584906126818d0257c9; and Melissa Leon, "Trump Delays Tariff Increase on $250B in Chinese Goods for Two Weeks to Oct. 15," Fox News, September 11, 2019, https://www.foxnews.com/politics/trump-delays-tariff-increase-250-billion-in-chinese-goods-gesture-of-good-will.

[14] James Politi and Richard Henderson, "US Agrees Limited Trade Deal with China," Financial Times, October 11, 2019, https://www.ft.com/content/28cc18f0-ec61-11e9-a240-3b065ef5fc55; and David J. Lynch, "Trump Announces Partial Trade Deal with China, Lifting Hopes That Tensions Could Ease," The Washington Post, October 11, 2019, https://www.washingtonpost.com/business/2019/10/11/us-stocks-poised-big-bounce-expectations-grow-us-china-trade-deal/.

Table D-2
Section 232 tariff actions: Presidential proclamations, 2017-19

Effective date	Tariff action
April 19, 2017	Commerce announced the institution of an investigation, by its U.S. Bureau of Industry and Security ("BIS") into the potential impact of imported steel mill products on national security (82 FR 19205).[1]
January 11, 2018	The Secretary of Commerce submitted the BIS Section 232 steel imports report to the President.[2]
March 23, 2018	The President announced the imposition of 25 percent ad valorem national-security duties on U.S. steel imports. Initially exempted— Canada and Mexico (83 FR 11625).[3]
March 23 through May 1, 2018	**Adjustment:** Exempted— Argentina, Australia, Brazil, Canada, the European Union ("EU") member states, Korea, and Mexico (83 FR 13361).[4]
May 1 through June 1, 2018	**Adjustment:** Exemptions continued with annual quota limits— Argentina, Brazil, and Korea. Exemptions not continued— Canada, Mexico, and EU member states (83 FR 20683, 83 FR 25857).[5]
August 13, 2018	**Adjustment:** Exemptions continued— Argentina, Australia, Brazil, and Korea. Duty rate doubled to 50 percent ad valorem— Turkey (83 FR 40429).[6]
May 20, 2019	**Adjustment:** Exemptions reinstated— Canada and Mexico (84 FR 23421).[7]
May 21, 2019	**Adjustment:** Duty rate cut from 50 percent back to 25 percent ad valorem— Turkey (84 FR 23987).[8]

[1] *Notice Request for Public Comments and Public Hearing on Section 232 National Security Investigation of Imports of Steel*, April 17, 2017, 82 FR 19205, April 26, 2017.

[2] "Statement from the Department of Commerce on Submission of Steel Section 232 Report to the President," News Release January 11, 2018, https://www.commerce.gov/news/press-releases/2018/01/statement-department-commerce-submission-steel-section-232-report.

[3] *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9705, March 8, 2018, 83 FR 11625, March 15, 2018.

[4] *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9711, March 22, 2018, 83 FR 13361, March 28, 2018.

[5] *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9740, April 30, 2018, 83 FR 20683, May 7, 2018; *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9759, May 31, 2018, 83 FR 25857, June 5, 2018. Continuation of the exemption for Australia, as of June 1, 2018, was included in subsequent Presidential Proclamation 9772, August 10, 2018.

[6] *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9772, August 10, 2018, 83 FR 40429, August 15, 2018.

[7] *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9886, May 16, 2019, 84 FR 23421, May 21, 2019.

[8] *Adjusting Imports of Steel Into the United States*, Presidential Proclamation 9894, May 19, 2019, 84 FR 23987, May 23, 2019.

APPENDIX E

U.S. IMPORTS BY SOURCE AND TYPE

Appendix E-1
Threaded rod: U.S. importers' U.S. imports, by source and type, 2016-18, January to June 2018, and January to June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Quantity (1,000 pounds)				
U.S. imports: China.-- Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: China	***	***	***	***	***
	Value (1,000 dollars)				
U.S. imports: China.-- Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: China	***	***	***	***	***
	Unit value (dollars per pound)				
U.S. imports: China.-- Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: China	***	***	***	***	***

Table continued on next page.

Appendix E-1--Continued
Threaded rod: U.S. importers' U.S. imports, by source and type, 2016-18, January to June 2018, and January to June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Share of quantity (percent)				
U.S. imports: China.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: China	***	***	***	***	***
	Share of value (percent)				
U.S. imports: China.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: China	***	***	***	***	***
	Ratio to official U.S. import statistics (percent)				
U.S. imports: China.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: China	***	***	***	***	***

Table continued on next page.

Appendix E-1--Continued
Threaded rod: U.S. importers' U.S. imports, by source and type, 2016-18, January to June 2018, and January to June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Quantity (1,000 pounds)				
U.S. imports: India.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: India	***	***	***	***	***
	Value (1,000 dollars)				
U.S. imports: India.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: India	***	***	***	***	***
	Unit value (dollars per pound)				
U.S. imports: India.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: India	***	***	***	***	***

Table continued on next page.

Appendix E-1--Continued
Threaded rod: U.S. importers' U.S. imports, by source and type, 2016-18, January to June 2018, and January to June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Share of quantity (percent)				
U.S. imports: India.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: India	***	***	***	***	***
	Share of value (percent)				
U.S. imports: India.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: India	***	***	***	***	***
	Ratio to official U.S. import statistics (percent)				
U.S. imports: India.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: India	***	***	***	***	***

Table continued on next page.

Appendix E-1--Continued
Threaded rod: U.S. importers' U.S. imports, by source and type, 2016-18, January to June 2018, and January to June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Quantity (1,000 pounds)				
U.S. imports: Taiwan.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Taiwan	***	***	***	***	***
	Value (1,000 dollars)				
U.S. imports: Taiwan.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Taiwan	***	***	***	***	***
	Unit value (dollars per pound)				
U.S. imports: Taiwan.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Taiwan	***	***	***	***	***

Table continued on next page.

Appendix E-1--Continued
Threaded rod: U.S. importers' U.S. imports, by source and type, 2016-18, January to June 2018, and January to June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Share of quantity (percent)				
U.S. imports: Taiwan.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Taiwan	***	***	***	***	***
	Share of value (percent)				
U.S. imports: Taiwan.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Taiwan	***	***	***	***	***
	Ratio to official U.S. import statistics (percent)				
U.S. imports: Taiwan.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Taiwan	***	***	***	***	***

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Appendix E-1--Continued
Threaded rod: U.S. importers' U.S. imports, by source and type, 2016-18, January to June 2018, and January to June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Quantity (1,000 pounds)				
U.S. imports: Thailand.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Thailand	***	***	***	***	***
	Value (1,000 dollars)				
U.S. imports: Thailand.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Thailand	***	***	***	***	***
	Unit value (dollars per pound)				
U.S. imports: Thailand.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Thailand	***	***	***	***	***

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Appendix E-1--Continued
Threaded rod: U.S. importers' U.S. imports, by source and type, 2016-18, January to June 2018, and January to June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Share of quantity (percent)				
U.S. imports: Thailand.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Thailand	***	***	***	***	***
	Share of value (percent)				
U.S. imports: Thailand.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Thailand	***	***	***	***	***
	Ratio to official U.S. import statistics (percent)				
U.S. imports: Thailand.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Thailand	***	***	***	***	***

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Appendix E-1--Continued
Threaded rod: U.S. importers' U.S. imports, by source and type, 2016-18, January to June 2018, and January to June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Quantity (1,000 pounds)				
U.S. imports: Subject source.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Subject	***	***	***	***	***
	Value (1,000 dollars)				
U.S. imports: Subject source.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Subject	***	***	***	***	***
	Unit value (dollars per pound)				
U.S. imports: Subject source.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Subject	***	***	***	***	***

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Appendix E-1--Continued
Threaded rod: U.S. importers' U.S. imports, by source and type, 2016-18, January to June 2018, and January to June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Share of quantity (percent)				
U.S. imports: Subject source.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Subject	***	***	***	***	***
	Share of value (percent)				
U.S. imports: Subject source.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Subject	***	***	***	***	***
	Ratio to official U.S. import statistics (percent)				
U.S. imports: Subject source.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Subject	***	***	***	***	***

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Appendix E-1--Continued
Threaded rod: U.S. importers' U.S. imports, by source and type, 2016-18, January to June 2018, and January to June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Quantity (1,000 pounds)				
U.S. imports: Nonsubject source.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Nonsubject	***	***	***	***	***
	Value (1,000 dollars)				
U.S. imports: Nonsubject source.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Nonsubject	***	***	***	***	***
	Unit value (dollars per pound)				
U.S. imports: Nonsubject source.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Nonsubject	***	***	***	***	***

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Appendix E-1--Continued
Threaded rod: U.S. importers' U.S. imports, by source and type, 2016-18, January to June 2018, and January to June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Share of quantity (percent)				
U.S. imports: Nonsubject source.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Nonsubject	***	***	***	***	***
	Share of value (percent)				
U.S. imports: Nonsubject source.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Nonsubject	***	***	***	***	***
	Ratio to official U.S. import statistics (percent)				
U.S. imports: Nonsubject source.--Continuous non-alloy	***	***	***	***	***
Continuous alloy	***	***	***	***	***
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	***	***	***	***	***
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: Nonsubject	***	***	***	***	***

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Appendix E-1--Continued
Threaded rod: U.S. importers' U.S. imports, by source and type, 2016-18, January to June 2018, and January to June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Quantity (1,000 pounds)				
U.S. imports: All import source.--Continuous non-alloy	62,172	55,763	65,540	31,484	35,208
Continuous alloy	50,993	75,490	106,210	48,130	51,187
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	113,165	131,253	171,749	79,614	86,394
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: All imports	116,920	136,089	176,731	82,370	88,581
	Value (1,000 dollars)				
U.S. imports: All import source.--Continuous non-alloy	30,343	31,005	39,848	17,586	20,313
Continuous alloy	28,987	47,696	69,335	33,533	35,791
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	59,330	78,701	109,183	51,118	56,105
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: All imports	69,055	91,161	123,394	58,465	62,427
	Unit value (dollars per pound)				
U.S. imports: All import source.--Continuous non-alloy	0.49	0.56	0.61	0.56	0.58
Continuous alloy	0.57	0.63	0.65	0.70	0.70
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	0.52	0.60	0.64	0.64	0.65
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: All imports	0.59	0.67	0.70	0.71	0.70

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Appendix E-1--Continued
Threaded rod: U.S. importers' U.S. imports, by source and type, 2016-18, January to June 2018, and January to June 2019

Item	Calendar year			January to June	
	2016	2017	2018	2018	2019
	Share of quantity (percent)				
U.S. imports: All import source.--Continuous non-alloy	53.2	41.0	37.1	38.2	39.7
Continuous alloy	43.6	55.5	60.1	58.4	57.8
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	96.8	96.4	97.2	96.7	97.5
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: All imports	100.0	100.0	100.0	100.0	100.0
	Share of value (percent)				
U.S. imports: All import source.--Continuous non-alloy	43.9	34.0	32.3	30.1	32.5
Continuous alloy	42.0	52.3	56.2	57.4	57.3
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	85.9	86.3	88.5	87.4	89.9
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: All imports	100.0	100.0	100.0	100.0	100.0
	Ratio to official U.S. import statistics (percent)				
U.S. imports: All import source.--Continuous non-alloy	28.1	22.2	21.7	24.1	22.2
Continuous alloy	23.0	30.0	35.2	36.8	32.3
Non-continuous non-alloy	***	***	***	***	***
Non-continuous alloy	***	***	***	***	***
Continuous	51.1	52.2	56.9	60.9	54.5
Non-continuous	***	***	***	***	***
Non-alloy	***	***	***	***	***
Alloy	***	***	***	***	***
All types: All imports	52.8	54.1	58.6	63.1	55.8

Note: Totals may not add due to rounding.

Source: Data compiled from Commission questionnaires.