

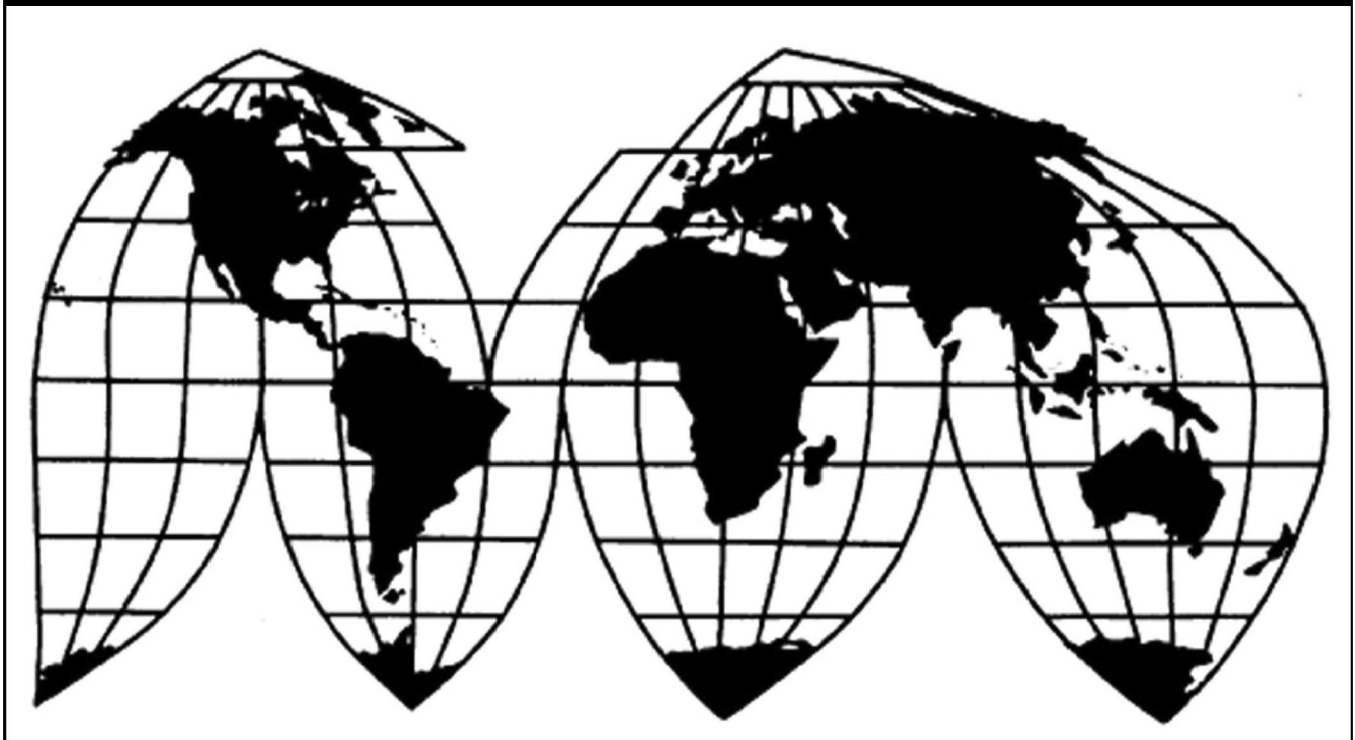
# **Prestressed Concrete Steel Wire Strand from Brazil, India, Japan, Korea, Mexico, and Thailand**

Investigation Nos. 701-TA-432 and 731-TA-1024-1028 (Third Review)  
and AA1921-188 (Fifth Review)

**Publication 5130**

**October 2020**

**U.S. International Trade Commission**



Washington, DC 20436

# U.S. International Trade Commission

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Note: Information that would reveal confidential operations of individual concerns may not be published.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

## UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-432 and 731-TA-1024-1028 (Third Review)

and AA1921-188 (Fifth Review)

Prestressed Concrete Steel Wire Strand from Brazil, India, Japan, Korea, Mexico, and Thailand

### DETERMINATIONS

On the basis of the record<sup>1</sup> developed in the subject five-year reviews, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that revocation of the countervailing duty order on prestressed concrete steel wire strand (“PC strand”) from India, the antidumping duty orders on PC strand from Brazil, India, Korea, Mexico, and Thailand, as well as the antidumping duty finding on PC strand from Japan, would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

### BACKGROUND

The Commission instituted these reviews on March 2, 2020 (85 FR 12331) and determined on June 5, 2020 that it would conduct expedited reviews (85 FR 61977, October 1, 2020).

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





## Views of the Commission

Based on the record in these five-year reviews, we determine under section 751(c) of the Tariff Act of 1930, as amended (“the Tariff Act”), that revocation of the countervailing duty order on prestressed concrete steel wire strand (“PC strand”) from India, the antidumping duty orders on PC strand from Brazil, India, Korea, Mexico, and Thailand, and the antidumping duty finding on PC strand from Japan would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

### I. Background

*Original Determination on PC Strand from Japan.* In November 1978, the Commission determined that a domestic industry was injured by reason of less than fair value imports of PC strand from Japan.<sup>1</sup> The U.S. Department of the Treasury (“Treasury”) subsequently issued an antidumping duty finding on imports of PC strand from Japan in December 1978.<sup>2</sup>

*First Two Reviews on PC Strand from Japan.* In January 1999, the Commission completed its expedited first five-year review of the antidumping duty finding on PC strand from Japan and determined that revocation of the finding would be likely to lead to a continuation or recurrence of material injury to an industry in the United States within a

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<sup>1</sup> *Steel Wire Strand for Prestressed Concrete from Japan*, Inv. No. AA1921-188, USITC Pub. 928 (Nov. 1978), (“Japan Original Determination”). The determination was issued pursuant to the Antidumping Act of 1921. Under the Antidumping Duty Act of 1921, the Commission made findings of “injury,” rather than “material injury.”

<sup>2</sup> *Steel Wire Strand for Prestressed Concrete from Japan*, 43 Fed. Reg. 57599 (Dec. 8, 1978). Prior to the adoption of the Trade Agreements Act of 1979, antidumping duty orders were referred to as “findings” pursuant to the Antidumping Act of 1921. See 19 U.S.C. § 160(a)(1976). Under current law, “findings” under the Antidumping Act of 1921 are subject to five-year reviews. See 19 U.S.C. §§ 1675(c)(1) & (6).

In the original investigation, Treasury excluded one Japanese producer, Kawatetsu Wire Products Co., Ltd., from its antidumping duty finding. Japan Original Determination, USITC Pub. 928 at 3. In 1986, the U.S. Department of Commerce (“Commerce”) revoked the antidumping duty finding for a second Japanese producer, Sumitomo Electric Industries, Ltd. *Steel Wire Strand for Prestressed Concrete from Japan*, 43 Fed. Reg. 57599 (Dec. 8, 1978). In a changed circumstances review in 1990, Commerce applied Kawatetsu’s exclusion to its initial successor in interest, Kawasaki Steel Techno-Wire (55 Fed. Reg. 28796 (Jul. 13, 1990)). There has been no changed circumstances review in which Commerce considered whether to extend the exclusion to Kawasaki’s successor, JFE Techno-Wire, and therefore the exclusion does not apply to JFE. *Prestressed Concrete Steel Wire Strand From Brazil, India, Japan, Mexico, Republic of Korea and Thailand: Final Results of Expedited Sunset Reviews of Antidumping Duty Finding and Orders*, 85 Fed. Reg. 39164 (June 30, 2020) and accompanying Issues and Decisions Memorandum at 5, EDIS Doc. 713.678.

reasonably foreseeable time.<sup>3</sup> As a result of the affirmative five-year review determinations by Commerce and the Commission, Commerce issued a continuation of the antidumping duty finding.<sup>4</sup>

In June 2004, the Commission completed its expedited second five-year review of the antidumping duty finding on PC strand from Japan and again determined that revocation of the finding would be likely to lead to a continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.<sup>5</sup> Commerce again issued a continuation of the antidumping duty finding on imports of PC strand from Japan.<sup>6</sup>

*Original Determinations on PC Strand from Brazil, India, Korea, Mexico, and Thailand.* In January 2004, the Commission determined that a domestic industry was materially injured by reason of subsidized imports of PC strand from India and less-than-fair-value imports of PC strand from Brazil, India, Korea, Mexico, and Thailand.<sup>7</sup> Commerce subsequently issued a countervailing duty order on imports of PC strand from India and antidumping duty orders on imports of PC strand from Brazil, India, Korea, Mexico, and Thailand.<sup>8</sup>

*2009 Five-Year Reviews.* The Commission conducted grouped first reviews of the countervailing duty order on PC strand from India and the antidumping duty orders on PC strand from Brazil, India, Korea, Mexico, and Thailand, and the third review of the antidumping duty finding on PC strand from Japan. After conducting full reviews, the Commission determined in November 2009 that revocation of those orders and finding would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.<sup>9</sup> Commerce accordingly issued a continuation of the

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<sup>3</sup> *Prestressed Concrete Steel Wire Strand from Japan*, Inv. No. AA1921-188 (Review), USITC Pub. 3156, February 1999 (“Japan First Review Determination”).

<sup>4</sup> *Continuation of Antidumping Finding: Prestressed Concrete Steel Wire Strand From Japan*, 64 Fed. Reg. 40554 (Jul. 27, 1999).

<sup>5</sup> *Prestressed Concrete Steel Wire Strand from Japan*, Inv. No. AA1921-188 (Second Review), USITC Pub. 3699 (Jun. 2004) (“Japan Second Review Determination”).

<sup>6</sup> *Continuation of Antidumping Duty Findings: Prestressed Concrete Wire Strand from Japan and Pressure Sensitive Plastic Tape From Italy*, 69 Fed. Reg. 35584 (Jun. 25, 2004).

<sup>7</sup> *Prestressed Concrete Steel Wire Strand From Brazil, India, Korea, Mexico, and Thailand*, Inv. Nos. 701-TA-432 and 731-TA-1024-1028 (Final), USITC Pub. 3663 (Jan. 2004) (“2004 Original Determinations”).

<sup>8</sup> *Notice of Antidumping Duty Order: Prestressed Concrete Steel Wire Strand from the Republic of Korea*, *Notice of Antidumping Duty Order: Prestressed Concrete Steel Wire Strand from India*, *Notice of Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Order: Prestressed Concrete Steel Wire Strand from Thailand*, *Notice of Antidumping Duty Order: Prestressed Concrete Steel Wire Strand from Brazil*, *Notice of Antidumping Duty Order: Prestressed Concrete Steel Wire Strand from Mexico*, 69 Fed. Reg. 4109-4113 (Jan. 28, 2004); and *Notice of Countervailing Duty Order: Prestressed Concrete Steel Wire Strand From India*, 69 Fed. Reg. 5319 (Feb. 4, 2004) (collectively, “2004 Orders”).

<sup>9</sup> *Prestressed Concrete Steel Wire Strand From Brazil, India, Japan, Korea, Mexico, and Thailand; Determinations*, 74 Fed. Reg. 62820 (Dec. 1, 2009); *Prestressed Concrete Steel Wire Strand from Brazil, India, Japan, Korea, Mexico, and Thailand*, Inv. Nos. 701-TA-432 and 731-TA-1024-1028 (Review) and AA1921-188 (Third Review), USITC Pub. 4114 (Nov. 2009) (“2009 Reviews”).

countervailing duty order on PC strand from India, the antidumping duty orders on PC strand from Brazil, India, Korea, Mexico, and Thailand, and the antidumping duty finding on PC strand from Japan.<sup>10</sup>

*2015 Five-Year Reviews.* In February 2015, the Commission determined that it would conduct expedited grouped second reviews of the countervailing duty order on PC strand from India and the antidumping duty orders on PC strand from Brazil, India, Korea, Mexico, and Thailand, and the fourth review of the antidumping duty finding on PC strand from Japan.<sup>11</sup> The Commission subsequently determined in April 2015 that revocation of those orders and finding would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.<sup>12</sup> Commerce accordingly issued a continuation of the countervailing duty order on PC strand from India, the antidumping duty orders on PC strand from Brazil, India, Korea, Mexico, and Thailand, and the antidumping duty finding on PC strand from Japan.<sup>13</sup>

None of the Commission's determinations in the original investigations or its prior five-year reviews have been appealed.

*Current reviews.* The Commission instituted these reviews on March 2, 2020.<sup>14</sup> On March 30, 2020, the sole response to the notice of institution was jointly filed by three U.S. producers of PC strand: Insteel Wire Products Company ("Insteel"), Sumiden Wire Products Corporation ("Sumiden"), and WMC Steel, LLC ("WMC") (collectively, the "Domestic Producers").<sup>15</sup> No respondent interested party filed a response to the notice of institution.<sup>16</sup> On June 5, 2020, the Commission determined that the domestic interested party group response to the notice of institution was adequate and that the respondent interested party

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<sup>10</sup> *Continuation of Antidumping and Countervailing Duty Finding and Orders: Prestressed Concrete Steel Wire Strand from Brazil, India, Japan, the Republic of Korea, Mexico, and Thailand*, 74 Fed. Reg. 65739 (Dec. 11, 2009).

<sup>11</sup> *Prestressed Concrete Steel Wire Strand From Brazil, India, Japan, Korea, Mexico and Thailand; Scheduling of Expedited Five-Year Reviews*, 80 Fed. Reg. 9747 (Feb. 24 2015).

<sup>12</sup> *Prestressed Concrete Steel Wire Strand From Brazil, India, Japan, Korea, Mexico, and Thailand*, 80 Fed. Reg. 20244 (Apr. 15, 2015); *Prestressed Concrete Steel Wire Strand from Brazil, India, Japan, Korea, Mexico, and Thailand*, Inv. Nos. 701-TA-432 and 731-TA-1024-1028 (Second Review) and AA1921-188 (Fourth Review), USITC Pub. 4527 (April 2015) ("2015 Reviews").

<sup>13</sup> *Prestressed Concrete Steel Wire Strand From Brazil, India, Japan, the Republic of Korea, Mexico, and Thailand: Continuation of the Antidumping Duty Finding/Orders and Countervailing Duty Order*, 80 Fed. Reg. 22708 (Apr. 23, 2015).

<sup>14</sup> *Prestressed Concrete Steel Wire Strand From Brazil, India, Japan, Korea, Mexico, and Thailand; Institution of Five-Year Reviews*, 85 Fed. Reg. 12331 (March 2, 2020).

<sup>15</sup> Confidential Report ("CR") INV-SS-062 (May 26, 2020); Public Report ("PR") at I-2; Domestic Producers March 30, 2020 Response to the Notice of Institution ("Domestic Producers Response"). Domestic Producers also filed adequacy comments. Domestic Producers May 14, 2020 Comments on Adequacy.

<sup>16</sup> CR/PR at I-2.

group response was inadequate.<sup>17</sup> Finding that no other circumstances warranted conducting a full review, the Commission determined to conduct expedited reviews.<sup>18</sup> Domestic Producers submitted comments pursuant to Commission rule 207.62(d) regarding the determination the Commission should reach.<sup>19</sup>

U.S. industry data are based on the joint response to the notice of institution of three U.S. producers of PC strand that are believed to account for \*\*\* percent of domestic production of PC strand in 2019.<sup>20</sup> U.S. import data and related information in these reviews are based on Commerce’s official import statistics.<sup>21</sup> Foreign industry data and related information are based on information from Domestic Producers and questionnaire responses from the original investigations and prior reviews, as well as publicly available information gathered by staff.<sup>22</sup> Two U.S. purchasers of PC strand responded to the Commission’s adequacy phase questionnaire.<sup>23</sup>

## II. Domestic Like Product and Industry

### A. Domestic Like Product

In making its determination under section 751(c) of the Tariff Act, the Commission defines the “domestic like product” and the “industry.”<sup>24</sup> The Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this subtitle.”<sup>25</sup> The Commission’s practice in five-year reviews is to examine the domestic like product definition from the original

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<sup>17</sup> Explanation of Commission Determination on Adequacy, EDIS Doc. 712920.

<sup>18</sup> Prestressed Concrete Steel Wire Strand From Brazil, India, Japan, Korea, Mexico, and Thailand; Scheduling of Expedited Five-Year Reviews, 85 Fed. Reg. 61977 (Oct. 1, 2020).

<sup>19</sup> Domestic Producers October 5, 2020 Final Comments (“Domestic Producers Final Comments”).

<sup>20</sup> CR/PR at Table I-1. This includes production data for 2019 that Insteel provided for former U.S. producer Strand-Tech Manufacturing, Inc. (“Strand-Tech”), which Insteel acquired in March 2020. *Id.* at note.

<sup>21</sup> CR/PR at I-20. In the original investigations concerning Brazil, India, Korea, Mexico, and Thailand, import data were based on questionnaire responses and official Commerce import statistics. In all other prior proceedings, import data were based only on official Commerce import statistics. CR/PR at I-20.

<sup>22</sup> See generally CR/PR at I-26 – I-33.

<sup>23</sup> CR/PR at App. D-3.

<sup>24</sup> 19 U.S.C. § 1677(4)(A).

<sup>25</sup> 19 U.S.C. § 1677(10); see, e.g., *Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996); *Torrington Co. v. United States*, 747 F. Supp. 744, 748-49 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991); see also S. Rep. No. 249, 96<sup>th</sup> Cong., 1<sup>st</sup> Sess. 90-91 (1979).

investigation and consider whether the record indicates any reason to revisit the prior findings.<sup>26</sup>

Commerce has defined the imported merchandise within the scope of the orders under review as follows:

The {product covered in the sunset reviews of the antidumping duty orders on PC strand from Brazil, India, Korea, Mexico, and Thailand and the countervailing duty order on PC strand from India is PC strand, which is} steel strand produced from wire of non-stainless, non-galvanized steel, which is suitable for use in prestressed concrete (both pre-tensioned and post-tensioned) applications. The product definition encompasses covered and uncovered strand and all types, grades, and diameters of PC strand.

The product covered in the sunset review of the antidumping duty finding on PC strand from Japan is steel wire strand, other than alloy steel, not galvanized, which is stress-relieved and suitable for use in prestressed concrete.

The merchandise subject to the {finding/orders} is currently classifiable under subheadings 7312.10.3010 and 7312.10.3012 of the Harmonized Tariff Schedule of the United States (HTSUS). Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the merchandise under {the finding/orders} is dispositive.<sup>27</sup>

PC strand consists of multiple steel wires wound together to produce a strong, flexible product that is used to strengthen concrete structures. It is commonly available in three grades, in covered and uncovered form, and in several nominal diameters. The most common PC strand configuration consists of six wires wound helically around a single wire core. Nominal diameters of PC strand typically range from 0.25 to 0.70 inch, while the three common grade

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<sup>26</sup> See, e.g., *Internal Combustion Industrial Forklift Trucks from Japan*, Inv. No. 731-TA-377 (Second Review), USITC Pub. 3831 at 8-9 (Dec. 2005); *Crawfish Tail Meat from China*, Inv. No. 731-TA-752 (Review), USITC Pub. 3614 at 4 (July 2003); *Steel Concrete Reinforcing Bar from Turkey*, Inv. No. 731-TA-745 (Review), USITC Pub. 3577 at 4 (Feb. 2003).

<sup>27</sup> *Prestressed Concrete Steel Wire Strand From India: Final Results of Expedited Sunset Review of Countervailing Duty Order*, 85 Fed. Reg. 38846 (June 29, 2020) and accompanying Issues and Decisions Memorandum at 2; *Prestressed Concrete Steel Wire Strand From Brazil, India, Japan, Mexico, Republic of Korea and Thailand: Final Results of Expedited Sunset Reviews of Antidumping Duty Finding and Orders*, 85 Fed. Reg. 39164 (June 30, 2020) and accompanying Issues and Decisions Memorandum at 3, EDIS Doc. 713.678.

designations (250, 270, and 300) correspond to the minimum ultimate strength of the product in thousands of pounds per square inch.<sup>28</sup>

PC strand is used in the construction of prestressed concrete structural components to introduce compression into the concrete. This compression offsets or neutralizes forces within the concrete that occur when it is subjected to loads. Typical applications of prestressed concrete include parking garages, bridge decks, bridge girders, pilings, precast concrete panels and structural supports, roof trusses, floor supports, and certain concrete foundations.<sup>29</sup>

PC strand may be pre-tensioned or post-tensioned. Pre-tensioned PC strand is tensioned (pulled tightly and slightly elongated) using a calibrated tensioning apparatus, and concrete is cured around the PC strand. After the concrete has cured, the tension is released, and the tensile force of the strand induces a compressive force in the concrete. For post-tensioned PC strand, there is no bond between the PC strand and the cured concrete. Instead, the PC strand is tensioned using a calibrated tensioning apparatus after the concrete has cured. In post-tensioned prestressed concrete, permanent mechanical anchors remain in place to maintain tension after the removal of the tensioning apparatus. Depending on the application, PC strand will be either uncoated or coated (with plastic or epoxy).<sup>30</sup>

## 1. The Original Investigations and Prior Five-Year Reviews

In its first two reviews of the antidumping finding concerning subject imports from Japan, the Commission defined the domestic like product as all steel wire strand, other than alloy steel, not galvanized, that has been stress-relieved and is suitable for use in prestressed concrete, coextensive with Commerce's scope.<sup>31</sup>

In its 2004 Original Determinations, the Commission defined the domestic like product in those determinations as "steel strand produced from wire of non-stainless, non-galvanized steel, that is suitable for use in prestressed concrete (both pretensioned and post-tensioned) applications and that encompasses covered and uncovered strand and all types, grades and diameters of PC strand," coextensive with Commerce's scope of investigations. The Commission considered and rejected an argument that covered and uncovered PC strand should be treated as separate domestic like products.<sup>32</sup>

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<sup>28</sup> CR/PR at I-9.

<sup>29</sup> CR/PR at I-9.

<sup>30</sup> CR/PR at I-10.

<sup>31</sup> Japan First Review Determination, USITC Pub. 3156 at 4; Japan Second Review Determination, USITC Pub. 3699 at 4-6. The Commission made its original determination with respect to PC strand from Japan after receiving advice from Treasury pursuant to the Anti-Dumping Act of 1921. Under the then applicable statutory provisions, the Commission did not make a like product determination *per se*, but it considered the relevant domestic industry to consist of "facilities in the United States devoted to the production of steel wire strand for prestressed concrete." Views of the Commission, EDIS Doc. No. 213232 at 3-4. Thus, the Commission essentially treated all PC strand as a single product in its original Japan determination.

<sup>32</sup> 2004 Original Determinations, USITC Pub. 3663 at 9-10.

In the 2009 Reviews, the Commission found that no new facts had been presented to warrant a conclusion different from that in the 2004 Original Determinations and the first and second reviews of the Japan finding. The Commission observed, moreover, that no party raised any objections to the Commission’s proposed definition of the domestic like product in either their responses to the notice of institution or their briefs. Therefore, the Commission defined the domestic like product to encompass “steel strand produced from wire of non-stainless, non-galvanized steel, which is suitable for use in prestressed concrete (both pre-tensioned and post-tensioned) applications and that encompasses covered and uncovered strand and all types, grades, and diameters of PC strand,” which is how Commerce had defined the scope of the countervailing duty order on imports of PC strand from India and the antidumping duty orders on imports of PC strand from Brazil, India, Korea, Mexico, and Thailand. The Commission stated that it recognized that the description of the scope of these orders differed in a number of technical respects from that of the scope of the Japan finding, but found that those differences lacked significance.<sup>33</sup>

In its 2015 Reviews, the Commission found that no new facts had been presented in the expedited reviews to warrant defining the domestic like product differently than in the 2009 Reviews. It observed that the responding domestic producers stated that they supported the definition set forth in the Commission’s prior determinations. Therefore, it again defined the domestic like product to encompass “steel strand produced from wire of non-stainless, non-galvanized steel, which is suitable for use in prestressed concrete (both pre-tensioned and post-tensioned) applications and that encompasses covered and uncovered strand and all types, grades, and diameters of PC strand.”<sup>34</sup>

## **2. The Current Reviews**

No new facts have been presented to warrant defining the domestic like product differently than in the 2009 and 2015 reviews.<sup>35</sup> Domestic Producers state that they support the definition set forth in the Commission’s 2004 determinations.<sup>36</sup> Therefore, we define the domestic like product, as we did in the 2009 and 2015 reviews, to encompass “steel strand produced from wire of non-stainless, non-galvanized steel, which is suitable for use in prestressed concrete (both pre-tensioned and post-tensioned) applications and that encompasses covered and uncovered strand and all types, grades, and diameters of PC strand,” coextensive with the scope of the orders under review.

### **B. Domestic Industry**

Section 771(4)(A) of the Tariff Act defines the relevant industry as the domestic “producers as a whole of a domestic like product, or those producers whose collective output

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<sup>33</sup> 2009 Reviews, USITC Pub. 4114 at 5-7.

<sup>34</sup> 2015 Reviews, USITC Pub. 4527 at 7.

<sup>35</sup> See *generally* CR/PR at I-8 – I-11.

<sup>36</sup> Domestic Producers Response at 23.

of a domestic like product constitutes a major proportion of the total domestic production of the product.”<sup>37</sup> In defining the domestic industry, the Commission’s general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

### **1. Domestic Industry in Original Determinations and Prior Five-Year Reviews**

In its original determination regarding subject imports from Japan, the Commission defined the domestic industry as “facilities in the United States devoted to the production of steel wire strand for prestressed concrete.”<sup>38</sup> In its expedited first and second reviews of the Japan finding, the Commission defined the domestic industry as all producers of PC strand.<sup>39</sup>

In the 2004 Original Determinations, the Commission defined the domestic industry to include all producers of PC strand. It determined that plastic coating did not constitute sufficient production-related activity to qualify coaters as members of the domestic industry producing PC strand.<sup>40</sup>

In the 2009 Reviews, the Commission observed that no new facts had been presented to warrant a conclusion different from that in the 2004 Original Determinations and the first and second reviews of the Japan finding. It noted, moreover, that no party raised any objections to this domestic industry definition. Therefore, based on its definition of the domestic like product, the Commission defined the domestic industry to include all producers of the domestic like product.<sup>41</sup>

In the 2015 Reviews, the Commission again observed that no new facts had been presented to warrant a conclusion different from the prior proceedings, that the record indicated that there were no issues concerning the related parties provision.<sup>42</sup> The Commission further observed that the domestic industry supported the prior domestic industry definition.

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<sup>37</sup> 19 U.S.C. § 1677(4)(A). The definitions in 19 U.S.C. § 1677 are applicable to the entire subtitle containing the antidumping and countervailing duty laws, including 19 U.S.C. §§ 1675 and 1675a. *See* 19 U.S.C. § 1677.

<sup>38</sup> Japan Original Determination, USITC Pub. 928 at 4.

<sup>39</sup> Japan First Review Determination, USITC Pub. 3156 at 4; Japan Second Review Determination, USITC Pub. 3699 at 6-7.

<sup>40</sup> 2004 Original Determinations, USITC Pub. 3663 at 10-12.

<sup>41</sup> 2009 Reviews, USITC Pub. 4114 at 7.

<sup>42</sup> *Original Determination*, USITC Pub. 3643 at 10. Section 771(4)(B) of the Tariff Act (19 U.S.C. § 1677(4)(B)) allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers. *See Torrington Co v. United States*, 790 F. Supp. 1161, 1168 (Ct. Int’l Trade 1992), *aff’d without opinion*, 991 F.2d 809 (Fed. Cir. 1993); *Sandvik AB v. United States*, 721 F. Supp. 1322, 1331-32 (Ct. Int’l Trade 1989), *aff’d mem.*, 904 F.2d 46 (Fed. Cir. 1990); *Empire Plow Co. v. United States*, 675 F. Supp. 1348, 1352 (Ct. Int’l Trade 1987).



Therefore, based on its definition of the domestic like product, the Commission defined the domestic industry to include all producers of the domestic like product.<sup>43</sup>

## 2. The Current Reviews

In these reviews, there continue to be no new facts presented that would warrant a conclusion different from the prior proceedings.<sup>44</sup> Moreover, Domestic Producers have stated that they agree with the definition of the domestic industry set forth in the 2004 Original Determinations.<sup>45</sup> Therefore, based on our definition of the domestic like product, we define the domestic industry to include all producers of the domestic like product.

## III. Cumulation

### A. Legal Standard

With respect to five-year reviews, section 752(a) of the Tariff Act provides as follows:

the Commission may cumulatively assess the volume and effect of imports of the subject merchandise from all countries with respect to which reviews under section 1675(b) or (c) of this title were initiated on the same day, if such imports would be likely to compete with each other and with domestic like products in the United States market. The Commission shall not cumulatively assess the volume and effects of imports of the subject merchandise in a case in which it determines that such imports are likely to have no discernible adverse impact on the domestic industry.<sup>46</sup>

Cumulation therefore is discretionary in five-year reviews, unlike original investigations, which are governed by section 771(7)(G)(i) of the Tariff Act.<sup>47</sup> The Commission may exercise its

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<sup>43</sup> 2015 Reviews, USITC Pub. 4527 at 9.

<sup>44</sup> These reviews do not present any issues regarding the related parties provision. Although Japanese producer Sumitomo is related to U.S. producer Sumiden, Sumitomo is not subject to the antidumping duty finding on Japan, and thus is not related pursuant to the statute. CR/PR at I-22.

<sup>45</sup> Domestic Producers Response at 23.

<sup>46</sup> 19 U.S.C. § 1675a(a)(7).

<sup>47</sup> 19 U.S.C. § 1677(7)(G)(i); *see also, e.g., Nucor Corp. v. United States*, 601 F.3d 1291, 1293 (Fed. Cir. 2010) (Commission may reasonably consider likely differing conditions of competition in deciding whether to cumulate subject imports in five-year reviews); *Allegheny Ludlum Corp. v. United States*, 475 F. Supp. 2d 1370, 1378 (Ct. Int'l Trade 2006) (recognizing the wide latitude the Commission has in selecting the types of factors it considers relevant in deciding whether to exercise discretion to cumulate subject imports in five-year reviews); *Nucor Corp. v. United States*, 569 F. Supp. 2d 1328, 1337-38 (Ct. Int'l Trade 2008).

discretion to cumulate, however, only if the reviews are initiated on the same day, the Commission determines that the subject imports are likely to compete with each other and the domestic like product in the U.S. market, and imports from each such subject country are not likely to have no discernible adverse impact on the domestic industry in the event of revocation. Our focus in five-year reviews is not only on present conditions of competition, but also on likely conditions of competition in the reasonably foreseeable future. The statutory threshold for cumulation is satisfied in these reviews, because all reviews were initiated on the same day: March 2, 2020.<sup>48</sup>

## **B. Prior Proceedings and Arguments of the Domestic Producer**

In the 2004 Original Determinations, the Commission cumulated imports from the five countries subject to those investigations. With respect to fungibility, the Commission found that PC strand from each of the subject sources was fungible with each other and with the domestic like product. It stated that PC strand is a largely undifferentiated product in the U.S. market, conforming to ASTM specifications and generally produced in a single form, size, and strength. All U.S. producers and purchasers considered domestically produced PC strand to be interchangeable with PC strand from each subject country and most importers considered the domestic like product and subject imports to be always or sometimes interchangeable. The Commission found that, although Buy America restrictions played a substantial role in the PC strand market, they did not apply to the majority of the U.S. market. The Commission also found subject imports from Mexico to be fungible with the domestic like product even though none of the domestic like product was plastic coated and some but not all of the subject imports from Mexico were plastic coated, and those that were plastic coated competed with domestic uncoated (“bare”) PC strand.<sup>49</sup>

The Commission also found overlapping geographic markets because the domestic like product and imports from all subject countries were generally marketed throughout the United States, an overlap of channels of distribution because most of the domestic like product and most subject imports were sold to end users, and simultaneous presence because the domestic like product and imports from all subject countries were present in the U.S. market throughout the period of investigation.<sup>50</sup>

In the 2009 Reviews, the Commission found that subject imports from each of the six countries would not be likely to have no discernible adverse impact on the domestic industry in the event of revocation. It based its no discernible adverse impact analysis upon such factors as the volume of subject imports from the individual countries prior to and following issuance of the orders or finding, production capacity and excess capacity of the industry in each subject country, and the export orientation of each subject industry.<sup>51</sup>

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<sup>48</sup> *Prestressed Concrete Steel Wire Strand From Brazil, India, Japan, Korea, Mexico, and Thailand; Institution of Five-Year Reviews*, 85 Fed. Reg. 12331 (Mar. 2, 2020).

<sup>49</sup> 2004 Original Determinations, USITC Pub. 3663 at 13-14.

<sup>50</sup> 2004 Original Determinations, USITC Pub. 3663 at 15.

<sup>51</sup> 2009 Reviews, USITC Pub. 4114 at 9-15.

The Commission also found a likely reasonable overlap of competition among the imports from the subject countries and between the subject imports and the domestic like product in the event of revocation. Regarding fungibility, the Commission observed that all domestic producers and a majority of importers and purchasers reported that the domestic like product, subject imports, and nonsubject imports were always interchangeable. The Commission found that the fungibility of subject imports and the domestic like product may have been limited somewhat by Buy America provisions and differing concentrations in the markets for pre-tensioned and post-tensioned applications, but found, as it had in the 2004 Original Determinations, that the Buy America provisions applied only to a portion of the market and that there was no difference between the PC strand sold for use in pre-tensioned and post-tensioned applications. The Commission found, as in the 2004 Original Determinations, that all reported shipments during the period of review were to end users. With the reduced volume of subject imports, the degree of overlap between geographic markets for subject imports and domestically produced PC strand was less than was observed during the original investigations, but at least some importers of subject merchandise reported selling in all regions of the United States, as did the domestic producers. The Commission found no evidence in the record that subject imports likely would not again compete in the same geographic markets with domestically produced PC strand in the reasonably foreseeable future upon revocation of the orders and the finding. Similarly, with respect to simultaneous presence, there was small or no volume of subject imports from certain of the subject countries under the discipline of the orders and finding. The Commission found that the industry in each of the subject countries was likely to resume or increase its exports to the United States upon revocation and thus that the subject imports and the domestic like product were likely to be simultaneously present in the U.S. market in the reasonably foreseeable future upon revocation. Accordingly, the Commission concluded that there likely would be a reasonable overlap of competition between the subject imports and the domestic like product and among the subject imports if the antidumping duty orders, the countervailing duty order, and the finding were revoked.<sup>52</sup>

The Commission also did not find any significant differences in the conditions under which subject imports from any subject country were likely to compete in the U.S. market if the orders or finding were revoked. The Commission rejected an argument that Mexico was a net importer of PC strand and, therefore, producers in Mexico were likely to compete under different conditions in the U.S. market in the event of revocation than were the producers in the other subject countries. The Commission found that being a net importer did not mean that exports from Mexico to the United States were any less likely than those from other subject countries in the event of revocation given the Mexican industry's export orientation in the original investigation, its current substantial excess capacity, and its proximity to the United States.<sup>53</sup>

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<sup>52</sup> 2009 Reviews, USITC Pub. 4114 at 15-18.

<sup>53</sup> 2009 Reviews, USITC Pub. 4114 at 19.

In the 2015 Reviews, the Commission found that subject imports from each of the six countries would not be likely to have no discernible adverse impact on the domestic industry in the event of revocation, again citing such factors as the volume of subject imports from the individual countries prior to and following issuance of the orders or finding, production capacity and excess capacity of the industry in each subject country, and the export orientation of each subject industry.<sup>54</sup> The Commission also found a likely reasonable overlap of competition among the imports from the subject countries and between the subject imports and the domestic like product in the event of revocation, indicating that the limited record of the expedited reviews included no new information suggesting that the Commission's findings with respect to fungibility, channels of distribution, geographic presence, and simultaneous presence had changed from the 2009 Reviews.<sup>55</sup> The Commission also did not find any significant differences in the conditions under which subject imports from any subject country were likely to compete in the U.S. market if the orders or finding were revoked.<sup>56</sup>

In the current reviews, Domestic Producers argue that the Commission should again exercise its discretion to cumulate subject imports in these reviews, as it has done in its prior reviews, because the same conditions that led the Commission to cumulate imports in the prior reviews continue to exist.<sup>57</sup> First, they assert that there is no evidence that subject imports from the subject countries are likely to have no discernible adverse impact on the domestic industry, claiming subject imports from each country would "flood the domestic market at prices that would undercut domestic pricing, causing significant adverse impacts on the domestic industry."<sup>58</sup> Second, they argue that there also continues to be a likely reasonable overlap of competition. According to Domestic Producers, domestically produced PC strand and PC strand from the subject countries are interchangeable, sold through the same channels of distribution (*i.e.*, to end users), and, absent the orders, are likely to be simultaneously present in the U.S. market given the significant capacity and export orientation of subject producers.<sup>59</sup>

### **C. Likelihood of No Discernible Adverse Impact**

The statute precludes cumulation if the Commission finds that subject imports from a country are likely to have no discernible adverse impact on the domestic industry.<sup>60</sup> Neither the statute nor the Uruguay Round Agreements Act ("URAA") Statement of Administrative Action ("SAA") provides specific guidance on what factors the Commission is to consider in determining that imports "are likely to have no discernible adverse impact" on the domestic

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<sup>54</sup> 2015 Reviews, USITC Pub. 4527 at 12-15.

<sup>55</sup> 2015 Reviews, USITC Pub. 4527 at 15-16.

<sup>56</sup> 2015 Reviews, USITC Pub. 4527 at 16.

<sup>57</sup> Domestic Producers Final Comments at 3-5.

<sup>58</sup> Domestic Producers Final Comments at 4.

<sup>59</sup> Domestic Producers Final Comments at 4-5.

<sup>60</sup> 19 U.S.C. § 1675a(a)(7).

industry.<sup>61</sup> With respect to this provision, the Commission generally considers the likely volume of subject imports and the likely impact of those imports on the domestic industry within a reasonably foreseeable time if the orders are revoked. Our analysis for each of the subject countries takes into account, among other things, the nature of the product and the behavior of subject imports in the original investigations.

Based on the record in these reviews, we find that imports from each subject country are not likely to have no discernible adverse impact on the domestic industry in the event of revocation of the corresponding order/finding.

*Brazil.* During the original period of investigation, Brazil was a significant exporter of the subject merchandise to the United States, and it was the third largest source of imports among the subject countries.<sup>62</sup> In the 2009 Reviews, the Commission found that subject imports from Brazil declined sharply in 2004.<sup>63</sup> It also observed that the capacity of the sole producer of PC strand in Brazil (Belgo Bekaert) had remained constant since the imposition of the antidumping duty order in 2004, although its capacity utilization was lower in January through June (“interim”) 2009 compared to interim 2008; it also found that there was evidence in the record that the company planned to expand its capacity for stranded wires and other long products.<sup>64</sup> In the 2015 Reviews, the Commission found that Belgo Bekaert claimed to be “the largest wire manufacturer in the Americas with an annual capacity of around 900,000 tons (1.8 billion pounds) of drawn wire.”<sup>65</sup>

In these reviews, subject imports from Brazil were only present in the U.S. market in 2015, at less than 500 pounds.<sup>66</sup> According to the Global Trade Atlas (“GTA”) data, Brazil’s annual exports under HTS subheading 7312.10, which includes PC strand as well as out-of-scope merchandise, increased overall from 2014 to 2019, ranging between 40.6 million and 75.3 million pounds.<sup>67</sup> GTA data further indicate that the Brazilian industry exported not only to regional export markets but also to destination markets in the Middle East during the review period.<sup>68</sup>

Based on the foregoing, we find that subject imports from Brazil would not likely have no discernible adverse impact on the domestic industry if the antidumping duty order concerning these imports were revoked.

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<sup>61</sup> SAA, H.R. Rep. No. 103-316, vol. I at 887 (1994).

<sup>62</sup> 2015 Reviews, USITC Pub. 4527 at 12.

<sup>63</sup> 2009 Reviews, USITC Pub. 4114 at 10 n.47; 2015 Reviews, USITC Pub. 4527 at 12.

<sup>64</sup> 2009 Reviews, USITC Pub. 4114 at 10 and VII-18; 2015 Reviews, USITC Pub. 4527 at 12.

<sup>65</sup> 2015 Reviews, USITC Pub. 4527 at 12. Belgo Bekaert is a joint venture between ArcelorMittal Brasil Long Wire, a member company of multinational steel producer ArcelorMittal Group, and N.V. Bekaert, a producer of wire and metallic coatings headquartered in Belgium. Domestic Producers Response at 10 & Exhibit 2.

<sup>66</sup> CR/PR at Table I-5 & note.

<sup>67</sup> CR/PR at Table I-8. Brazil’s annual exports under HTS subheading 7312.10 were 40.6 million pounds in 2014, 44.8 million pounds in 2015, 75.3 million pounds in 2016, 73.2 million pounds in 2017, 67.9 million pounds in 2018, and 72.6 million pounds in 2019. *Id.*

<sup>68</sup> CR/PR at Table I-8.

*India.* During the original period of investigation, subject imports from India increased steadily. In the 2009 and 2015 Reviews, the Commission found that they were present in the U.S. market in small quantities from 2004 to 2008, and absent from the U.S. market since 2009.<sup>69</sup> The Commission observed that the industry in India had substantial unused capacity in the original period of investigation and that, based on the questionnaire response of the sole producer in India that responded in the 2009 reviews, that the industry in India was at least moderately export oriented.<sup>70</sup> The Commission found that there were three PC strand producers in India at the time of the original investigations and four in the periods examined in the 2009 and 2015 reviews.<sup>71</sup>

In these reviews, Domestic Producers report that these same four producers continue to operate and maintain a global presence.<sup>72</sup> Subject imports from India were only present in the U.S. market in 2015, at 34,000 pounds.<sup>73</sup> According to GTA data, India's annual exports under HTS subheading 7312.10, which includes PC strand as well as out-of-scope merchandise, ranged between 113.8 million and 169.2 million pounds from 2014 to 2019.<sup>74</sup> GTA data also indicate that the Indian industry exported to markets in Asia, Africa, and the Middle East during the review period.<sup>75</sup>

Based on the foregoing, we find that subject imports from India would not likely have no discernible adverse impact on the domestic industry if the countervailing and antidumping duty orders concerning these imports were revoked.

*Japan.* While subject imports from Japan decreased both absolutely and relative to U.S. consumption between 1974 and 1977, they held over 60 percent of the U.S. market in both 1976 and 1977.<sup>76</sup> In prior reviews, the Commission observed that subject imports from Japan were present in the U.S. market in each year from 2004 to 2008 in amounts ranging from 1.4 million pounds to 2.0 million pounds,<sup>77</sup> and absent from the market in 2009 and 2010, but were present in 2011, 2012, and 2013 in quantities ranging from 651,000 pounds to 1.3 million pounds.<sup>78</sup> In the 2015 Reviews, the Commission indicated that there were believed to be four subject producers of PC strand in Japan.<sup>79</sup> It further observed that the most recent information on capacity in Japan was from the second five-year review of the Japan finding, in which the

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<sup>69</sup> 2009 Reviews, USITC Pub. 4114 at 10 & n.57; 2015 Reviews, USITC Pub. 4527 at 12-13.

<sup>70</sup> 2009 Reviews, USITC Pub. 4114 at 10 n.47; 2015 Reviews, USITC Pub. 4527 at 12-13.

<sup>71</sup> 2015 Reviews, USITC Pub. 4527 at 12-13.

<sup>72</sup> Domestic Producers Response at 10-11 & Exhibit 4.

<sup>73</sup> CR/PR at Table I-5.

<sup>74</sup> CR/PR at Table I-9. India's annual exports under HTS subheading 7312.10 were 169.2 million pounds in 2014, 113.8 million pounds in 2015, 147.9 million pounds in 2016, 134.8 million pounds in 2017, 168.5 million pounds in 2018, and 164.8 million pounds in 2019. *Id.*

<sup>75</sup> CR/PR at Table I-9.

<sup>76</sup> 2015 Reviews, USITC Pub. 4527 at 13.

<sup>77</sup> 2009 Reviews, USITC Pub. 4114 at 11; 2015 Reviews, USITC Pub. 4527 at 13.

<sup>78</sup> 2015 Reviews, USITC Pub. 4527 at 13.

<sup>79</sup> 2015 Reviews, USITC Pub. 4527 at 13.

Commission found that Japanese producers subject to the antidumping finding had substantial unused capacity to manufacture PC strand.<sup>80</sup>

In these reviews, Domestic Producers identified four possible subject producers of PC strand in Japan and assert, in particular, that two of them produce and export PC strand.<sup>81</sup> Subject imports from Japan were 867,000 pounds in 2014, 989,000 pounds in 2015, 1,000 pounds in 2016, 657,000 pounds 2018, and 651,000 pounds in 2019.<sup>82</sup> In 2019, subject imports from Japan accounted for \*\*\* percent of the U.S. PC strand market.<sup>83</sup> According to GTA data, Japan's annual exports under HTS subheading 7312.10, which includes PC strand as well as out-of-scope and nonsubject merchandise, ranged between 65.0 million and 84.7 million pounds from 2014 to 2019.<sup>84</sup> GTA data also indicate that, although concentrated in the Asian market, the Japanese industry also exported to Australia and Poland during the review period.<sup>85</sup>

Based on the foregoing, we find that subject imports from Japan would not likely have no discernible adverse impact on the domestic industry if the antidumping duty finding concerning these imports were revoked.

*Korea.* In the 2015 Reviews, the Commission observed that subject imports from Korea increased sharply during the original period of investigation, declined sharply in 2004 and 2005, were at quantities ranging from 2.8 million to 4.0 million pounds from 2006 to 2008, and remained in the U.S. market at quantities ranging from 462,000 pounds to 2.3 million pounds from 2009 to 2013.<sup>86</sup> The Commission further observed that, during the original investigations, the Korean PC strand industry had substantial unused capacity and that, in the 2009 reviews, the capacity utilization of the two Korean producers that responded to the Commission's questionnaire in those reviews was lower in interim 2009 than in interim 2008.<sup>87</sup> In the 2015 Reviews, there were believed to be four producers of PC strand in Korea during that period of review.<sup>88</sup>

In these reviews, Domestic Producers assert that these four producers continue to produce and export PC strand.<sup>89</sup> Subject imports from Korea were 2.1 million pounds in 2014, 1.8 million pounds in 2015, 653,000 pounds in 2016, 355,000 pounds in 2017, 744,000 pounds

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<sup>80</sup> 2015 Reviews, USITC Pub. 4527 at 13 (*citing* Japan Second Review Determination, USITC Pub. 3699 at 11; 2009 Reviews, USITC Pub. 4114 at 11).

<sup>81</sup> Domestic Producers Response at 11-12 & Exhibits 5, 10.

<sup>82</sup> CR/PR at Table I-5. There were no reported subject imports from Japan in 2017. *Id.*

<sup>83</sup> CR/PR at Table I-6.

<sup>84</sup> CR/PR at Table I-10. As discussed above, Japanese producer Sumitomo is not subject to the antidumping duty finding on Japan. CR/PR at I-22. Japan's annual exports under HTS subheading 7312.10 were 84.7 million pounds in 2014, 76.1 million pounds in 2015, 73.4 million pounds in 2016, 75.8 million pounds in 2017, 68.0 million pounds in 2018, and 65.0 million pounds in 2019. *Id.*

<sup>85</sup> CR/PR at Table I-10.

<sup>86</sup> 2015 Reviews, USITC Pub. 4527 at 13-13; 2009 Reviews, USITC Pub. 4114 at 12 & n.65.

<sup>87</sup> 2015 Reviews, USITC Pub. 4527 at 13-14; 2009 Reviews, USITC Pub. 4114 at 12.

<sup>88</sup> 2015 Reviews, USITC Pub. 4527 at 13-14.

<sup>89</sup> Domestic Producers Response at 12 & Exhibit 6.

in 2018, and 554,000 pounds in 2019.<sup>90</sup> In 2019, subject imports from Korea accounted for \*\*\* percent of the U.S. PC strand market.<sup>91</sup> According to GTA data, Korea's annual exports under HTS subheading 7312.10, which includes PC strand as well as out-of-scope merchandise, ranged between 494.5 million and 736.2 million pounds from 2014 to 2019.<sup>92</sup> GTA data also indicate that the Korean industry exported to markets in Asia, the Middle East, and Europe during the review period.<sup>93</sup>

Based on the foregoing, we find that subject imports from Korea would not likely have no discernible adverse impact on the domestic industry if the antidumping duty order concerning these imports were revoked.

*Mexico.* During the original period of investigation, subject imports from Mexico increased sharply, and it was the second largest source of subject imports.<sup>94</sup> In the 2015 Reviews, the Commission observed that subject imports from Mexico declined sharply in 2004 and that the known producers of PC strand in Mexico stated in the prior 2009 Reviews that they had not exported subject merchandise to the United States since \*\*\*.<sup>95</sup> Based on the two companies' responses to questionnaires in the 2009 Reviews, the Commission found that the capacity of the Mexican PC strand industry had increased substantially and its capacity utilization rate had fallen substantially since the original investigations.<sup>96</sup>

In these reviews, Domestic Producers assert that these same two producers continue to produce and export PC strand.<sup>97</sup> Subject imports from Mexico were 1.8 million pounds in 2014 and 3,000 pounds in 2018.<sup>98</sup> According to GTA data, Mexico's annual exports under HTS subheading 7312.10, which may include PC strand as well as out-of-scope merchandise, ranged between 23.4 million and 41.4 million pounds from 2014 to 2019.<sup>99</sup> During this time, the United States was the largest single country export market for Mexico's annual exports under

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

<sup>91</sup> CR/PR at Table I-6.

<sup>92</sup> CR/PR at Table I-11. Korea's annual exports under HTS subheading 7312.10 were 736.2 million pounds in 2014, 594.8 million pounds in 2015, 571.4 million pounds in 2016, 560.3 million pounds in 2017, 533.3 million pounds in 2018, and 494.5 million pounds in 2019. *Id.*

<sup>93</sup> CR/PR at Table I-11.

<sup>94</sup> 2015 Reviews, USITC Pub. 4527 at 14; 2009 Reviews, USITC Pub. 4114 at 12.

<sup>95</sup> 2015 Reviews, USITC Pub. 4527 at 14, Confidential Views, EDIS Doc. 708075 at 20. The Commission observed that, because official import statistics indicate varying quantities of imports from Mexico during the period of review, the data may have included out-of-scope merchandise. *Id.*

<sup>96</sup> 2009 Reviews, USITC Pub. 4114 at 12; 2015 Reviews, USITC Pub. 4527 at 14.

<sup>97</sup> Domestic Producers Response at 12-13 & Exhibit 7.

<sup>98</sup> CR/PR at Table I-5. There were no reported subject imports from Mexico in 2015, 2016, 2017, and 2019. *Id.* As indicated above, in light of the representations of the two known PC strand producers in Mexico in the earlier reviews, these exports may include out-of-scope merchandise.

<sup>99</sup> CR/PR at Table I-12. Mexico's annual exports under HTS subheading 7312.10 were 32.7 million pounds in 2014, 34.9 million pounds in 2015, 23.4 million pounds in 2016, 28.4 million pounds in 2017, 41.4 million pounds in 2018, and 30.9 million pounds in 2019. *Id.*



HTS subheading 7312.10, with the volume of exports to the United States increasing overall from 2014 to 2019.<sup>100</sup>

Based on the foregoing, we find that subject imports from Mexico would not likely have no discernible adverse impact on the domestic industry if the antidumping duty order concerning these imports were revoked.

*Thailand.* Imports from Thailand increased over the original period of investigation.<sup>101</sup> In prior reviews, the Commission observed that the quantity of subject imports from Thailand declined moderately in 2004, sharply in 2005 and 2006, and was zero in 2007 and 2008; the quantity of subject imports from Thailand rose to 106,000 pounds in 2009 and 1.0 million pounds in 2010, and was zero in 2011, 2012, and 2013.<sup>102</sup> During the original period of investigation, there were believed to be five producers of PC strand in Thailand and six producers in the prior reviews.<sup>103</sup> The record of the 2009 Reviews did not include complete capacity data for the industry in Thailand, but the Commission found that the record data indicated that the capacity of the industry in Thailand had increased substantially since the original investigations and that it had substantial unused capacity during the original investigations.<sup>104</sup>

In these reviews, Domestic Producers claim that there are five producers of PC strand in Thailand and assert, in particular, that three of them continue to produce and export PC strand.<sup>105</sup> Subject imports from Thailand were 88,000 pounds in 2015, 7.8 million pounds in 2018, and 2.1 million pounds in 2019.<sup>106</sup> In 2019, subject imports from Thailand accounted for \*\*\* percent of the U.S. PC strand market.<sup>107</sup> According to GTA data, Thailand's annual exports under HTS subheading 7312.10, which may include PC strand as well as out-of-scope merchandise, ranged between 235.2 million and 385.7 million pounds from 2014 to 2019.<sup>108</sup> During this time, the United States was one of the largest export markets for Thailand's annual

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<sup>100</sup> Mexico's annual exports to the United States under HTS subheading 7312.10 were 20.6 million pounds in 2014, 16.6 million pounds in 2015, 16.3 million pounds in 2016, 19.4 million pounds in 2017, 33.9 million pounds in 2018, and 30.6 million pounds in 2019. *Id.*

<sup>101</sup> 2009 Reviews, USITC Pub. 4114 at 15; 2015 Reviews, USITC Pub. 4527 at 15-16.

<sup>102</sup> 2009 Reviews, USITC Pub. 4114 at 15; 2015 Reviews, USITC Pub. 4527 at 15-16.

<sup>103</sup> 2009 Reviews, USITC Pub. 4114 at 15; 2015 Reviews, USITC Pub. 4527 at 15-16.

<sup>104</sup> 2009 Reviews, USITC Pub. 4114 at 15; 2015 Reviews, USITC Pub. 4527 at 15-16.

<sup>105</sup> Domestic Producers Response at 13-14 & Exhibit 8. According to Domestic Producers, one of the firms in Thailand that was identified as a producer of PC strand in the prior reviews ceased production in 2016. *Id.*

<sup>106</sup> CR/PR at Table I-5. There were no reported subject imports from Thailand in 2014, 2016, and 2017. *Id.*

<sup>107</sup> CR/PR at Table I-6.

<sup>108</sup> CR/PR at Table I-13. Thailand's annual exports under HTS subheading 7312.10 were 235.2 million pounds in 2014, 250.5 million pounds in 2015, 288.2 million pounds in 2016, 311.4 million pounds in 2017, 385.7 million pounds in 2018, and 349.5 million pounds in 2019. *Id.*

exports under HTS subheading 7312.10.<sup>109</sup> GTA data also indicate that the Thai industry exported not only to regional export markets in Asia but also to destination markets in Europe during the review period.<sup>110</sup>

Based on the foregoing, we find that subject imports from Thailand would not likely have no discernible adverse impact on the domestic industry if the antidumping duty order concerning these imports were revoked.

#### **D. Likelihood of a Reasonable Overlap of Competition**

The Commission generally has considered four factors intended to provide a framework for determining whether subject imports compete with each other and with the domestic like product.<sup>111</sup> Only a “reasonable overlap” of competition is required.<sup>112</sup> In five-year reviews, the relevant inquiry is whether there likely would be competition even if none currently exists because the subject imports are absent from the U.S. market.<sup>113</sup>

*Fungibility.* As stated above, the Commission found in the 2004 Original Determinations and in the 2009 and 2015 Reviews that imports from each subject country were generally interchangeable with the domestic like product, notwithstanding Buy America requirements and differing concentrations in pre-tensioned and post-tensioned applications. There is no new

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<sup>109</sup> Thailand’s annual exports to the United States under HTS subheading 7312.10 were 30.0 million pounds in 2014, 29.0 million pounds in 2015, 27.2 million pounds in 2016, 20.7 million pounds in 2017, 30.4 million pounds in 2018, and 30.2 million pounds in 2019. *Id.*

<sup>110</sup> CR/PR at Table I-13.

<sup>111</sup> The four factors generally considered by the Commission in assessing whether imports compete with each other and with the domestic like product are as follows: (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 geographical markets of 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 subject imports are simultaneously present in the market with one another and the domestic like product. *See, e.g., Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int’l Trade 1989).

<sup>112</sup> *See Mukand Ltd. v. United States*, 937 F. Supp. 910, 916 (Ct. Int’l Trade 1996); *Wieland Werke*, 718 F. Supp. at 52 (“Completely overlapping markets are not required.”); *United States Steel Group v. United States*, 873 F. Supp. 673, 685 (Ct. Int’l Trade 1994), *aff’d*, 96 F.3d 1352 (Fed. Cir. 1996). We note, however, that there have been investigations where the Commission has found an insufficient overlap in competition and has declined to cumulate subject imports. *See, e.g., Live Cattle from Canada and Mexico*, Inv. Nos. 701-TA-386 and 731-TA-812-13 (Preliminary), USITC Pub. 3155 at 15 (Feb. 1999), *aff’d sub nom, Ranchers-Cattlemen Action Legal Foundation v. United States*, 74 F. Supp. 2d 1353 (Ct. Int’l Trade 1999); *Static Random Access Memory Semiconductors from the Republic of Korea and Taiwan*, Inv. Nos. 731-TA-761-62 (Final), USITC Pub. 3098 at 13-15 (Apr. 1998).

<sup>113</sup> *See generally, Cheflene Corp. v. United States*, 219 F. Supp. 2d 1313, 1314 (Ct. Int’l Trade 2002).

information in these reviews to indicate that this has changed. Domestic Producers allege that PC strand from each subject country and the United States is interchangeable.<sup>114</sup>

*Channels of Distribution.* In the original investigations and prior reviews, the Commission found that domestically produced PC strand and imports from each subject country were sold to end users.<sup>115</sup> There is no new information in these reviews to indicate that this has changed. Domestic Producers claim that both domestically produced PC strand and subject imports from each subject country are sold through the same channels of distribution.<sup>116</sup>

*Geographic Overlap.* In the original investigations, the domestic industry and importers reported selling their products in overlapping geographic markets.<sup>117</sup> In the 2009 Reviews, the Commission found that the domestic like product and at least some importers of subject merchandise sold PC strand nationwide.<sup>118</sup> In the 2015 Reviews, the Commission found that the domestic like product was sold nationwide, imports from four subject countries (Japan, Korea, Mexico, and Thailand) entered in Los Angeles, and imports from three subject countries (Brazil, Korea, and Mexico) entered in Seattle.<sup>119</sup> In the 2009 and 2015 Reviews, the Commission found that there was no evidence in the record that subject imports would not again compete in the same geographic markets with domestically produced PC strand in the reasonably foreseeable future upon revocation of the orders and the finding.<sup>120</sup>

In these reviews, the record indicates that subject imports from Brazil entered through the eastern border of the United States; subject imports from India entered through the western border of the United States; subject imports from Japan entered through the northern, southern, eastern, and western borders; subject imports from Korea, Mexico, and Thailand entered through the southern, western, and eastern borders.<sup>121</sup> Domestic Producers allege that the same conditions that led the Commission to cumulate subject imports in the prior reviews continue to exist in the current reviews.<sup>122</sup> As in the prior reviews, there is no evidence in the record that subject imports likely would not again compete in the same geographic markets with domestically produced PC strand upon revocation.

*Simultaneous Presence in Market.* In the original investigations, the Commission found that domestic shipments of PC strand and subject imports from each source were simultaneously present in the U.S. market.<sup>123</sup> The Commission found in the 2009 and 2015 Reviews that, although imports from each subject country were not present in the U.S. market

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<sup>114</sup> Domestic Producers Final Comments at 4.

<sup>115</sup> 2004 Original Determinations, USITC Pub. 3663 at 15; 2009 Reviews, USITC Pub. 4114 at 17; 2015 Reviews, USITC Pub. 4527 at 15.

<sup>116</sup> Domestic Producers Final Comments at 4.

<sup>117</sup> 2004 Original Determinations, USITC Pub. 3663 at 15.

<sup>118</sup> 2009 Reviews, USITC Pub. 4114 at 17.

<sup>119</sup> 2015 Reviews, USITC Pub. 4527 at 16.

<sup>120</sup> 2009 Reviews, USITC Pub. 4114 at 17; 2015 Reviews, USITC Pub. 4527 at 16.

<sup>121</sup> CR/PR at I-25 – I-26; EDIS Document No. 709443.

<sup>122</sup> Domestic Producers Final Comments at 4.

<sup>123</sup> 2015 Reviews, USITC Pub. 4527 at 16.

throughout the period of review, each subject country was likely to resume or increase its exports to the United States upon revocation.<sup>124</sup> In these reviews, U.S. imports of PC strand from Korea were present in each year between 2014 and 2019; however, the presence of imports from other subject sources was sporadic.<sup>125</sup> Subject imports from Brazil and India were present in 2015; subject imports from Japan were present in 2014, 2015, 2016, 2018, and 2019; subject imports from Mexico were present in 2014 and 2018; and subject imports from Thailand were present in 2015, 2018, and 2019.<sup>126</sup>

There is nothing in the record of these current reviews that indicates that, were the finding and orders revoked, there would be a change in the simultaneous presence observed in the original investigations.

*Conclusion.* The record of these expedited reviews contains very limited information concerning subject imports from the subject countries during the period of review. The record, however, contains no information suggesting a change in the considerations that led the Commission in prior reviews to conclude that there would be a likely reasonable overlap of competition between and among imports from different subject sources and the domestic like product upon revocation. In light of this and the absence of any contrary argument, we find a likely reasonable overlap of competition between and among subject imports from Brazil, India, Japan, Korea, Mexico, and Thailand, and between subject imports from each country and the domestic like product.

#### **E. Likely Conditions of Competition**

In determining whether to exercise our discretion to cumulate the subject imports, we assess whether imports of PC strand from the subject countries would likely compete under similar or different conditions in the U.S. market if the orders under review were revoked. As previously discussed, particularly in the 2015 Reviews, the Commission found that there would not likely be any significant difference in the conditions of competition between subject imports from Brazil, India, Japan, Korea, Mexico, and Thailand if the orders were revoked. We similarly find that the record in these reviews does not indicate that there would likely be any significant difference in the conditions of competition among subject imports upon revocation of the orders.

#### **F. Conclusion**

Based on the record, we find that subject imports from Brazil, India, Japan, Korea, Mexico, and Thailand would not be likely to have no discernible adverse impact on the domestic industry if the corresponding orders were revoked. We also find a likely reasonable overlap of competition among subject imports from Brazil, India, Japan, Korea, Mexico, and Thailand, and between imports from each subject country and the domestic like product.

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<sup>124</sup> 2009 Reviews, USITC Pub. 4114 at 18; 2015 Reviews, USITC Pub. 4527 at 16.

<sup>125</sup> CR/PR at I-25.

<sup>126</sup> CR/PR at I-25.

Finally, we find that imports from each of the subject countries are likely to compete in the U.S. market under similar conditions of competition should the orders and finding be revoked. We therefore exercise our discretion to cumulate subject imports from Brazil, India, Japan, Korea, Mexico, and Thailand for our analysis of whether material injury to the domestic industry is likely to continue or recur if the orders and finding were to be revoked.

#### **IV. Revocation of the Countervailing Duty Order on PC Strand from India, the Antidumping Duty Orders on PC strand from Brazil, India, Korea, Mexico, and Thailand, and the Antidumping Duty Finding on PC strand from Japan Would Likely Lead to Continuation or Recurrence of Material Injury Within a Reasonably Foreseeable Time**

##### **A. Legal Standards**

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order “would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.”<sup>127</sup> The SAA states that “under the likelihood standard, the Commission will engage in a counterfactual analysis; it must decide the likely impact in the reasonably foreseeable future of an important change in the status quo – the revocation or termination of a proceeding and the elimination of its restraining effects on volumes and prices of imports.”<sup>128</sup> Thus, the likelihood standard is prospective in nature.<sup>129</sup> The U.S. Court of International Trade has found that “likely,” as used in the five-year review provisions of the Act, means “probable,” and the Commission applies that standard in five-year reviews.<sup>130</sup>

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<sup>127</sup> 19 U.S.C. § 1675a(a).

<sup>128</sup> SAA at 883-84. The SAA states that “[t]he likelihood of injury standard applies regardless of the nature of the Commission’s original determination (material injury, threat of material injury, or material retardation of an industry). Likewise, the standard applies to suspended investigations that were never completed.” *Id.* at 883.

<sup>129</sup> While the SAA states that “a separate determination regarding current material injury is not necessary,” it indicates that “the Commission may consider relevant factors such as current and likely continued depressed shipment levels and current and likely continued {sic} prices for the domestic like product in the U.S. market in making its determination of the likelihood of continuation or recurrence of material injury if the order is revoked.” SAA at 884.

<sup>130</sup> See *NMB Singapore Ltd. v. United States*, 288 F. Supp. 2d 1306, 1352 (Ct. Int’l Trade 2003) (“‘likely’ means probable within the context of 19 U.S.C. § 1675(c) and 19 U.S.C. § 1675a(a)”), *aff’d mem.*, 140 Fed. Appx. 268 (Fed. Cir. 2005); *Nippon Steel Corp. v. United States*, 26 CIT 1416, 1419 (2002) (same); *Usinor Industeel, S.A. v. United States*, 26 CIT 1402, 1404 nn.3, 6 (2002) (“more likely than not” standard is “consistent with the court’s opinion;” “the court has not interpreted ‘likely’ to imply any particular degree of ‘certainty’”); *Indorama Chemicals (Thailand) Ltd. v. United States*, 26 CIT 1059, 1070 (Continued...)

The statute states that “the Commission shall consider that the effects of revocation or termination may not be imminent, but may manifest themselves only over a longer period of time.”<sup>131</sup> According to the SAA, a “‘reasonably foreseeable time’ will vary from case-to-case, but normally will exceed the ‘imminent’ timeframe applicable in a threat of injury analysis in original investigations.”<sup>132</sup>

Although the standard in a five-year review is not the same as the standard applied in an original investigation, it contains some of the same fundamental elements. The statute provides that the Commission is to “consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the orders are revoked or the suspended investigation is terminated.”<sup>133</sup> It directs the Commission to take into account its prior injury determination, whether any improvement in the state of the industry is related to the order or the suspension agreement under review, whether the industry is vulnerable to material injury if an order is revoked or a suspension agreement is terminated, and any findings by Commerce regarding duty absorption pursuant to 19 U.S.C. § 1675(a)(4).<sup>134</sup> The statute further provides that the presence or absence of any factor that the Commission is required to consider shall not necessarily give decisive guidance with respect to the Commission’s determination.<sup>135</sup>

In evaluating the likely volume of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether the likely volume of imports would be significant either in absolute terms or relative to production or consumption in the United States.<sup>136</sup> In doing so, the Commission must consider “all relevant economic factors,” including four enumerated factors: (1) any likely increase in production capacity or existing unused production capacity in the exporting country; (2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the

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(...Continued)

(2002) (“standard is based on a likelihood of continuation or recurrence of injury, not a certainty”); *Usinor v. United States*, 26 CIT 767, 794 (2002) (“‘likely’ is tantamount to ‘probable,’ not merely ‘possible’”).

<sup>131</sup> 19 U.S.C. § 1675a(a)(5).

<sup>132</sup> SAA at 887. Among the factors that the Commission should consider in this regard are “the fungibility or differentiation within the product in question, the level of substitutability between the imported and domestic products, the channels of distribution used, the methods of contracting (such as spot sales or long-term contracts), and lead times for delivery of goods, as well as other factors that may only manifest themselves in the longer term, such as planned investment and the shifting of production facilities.” *Id.*

<sup>133</sup> 19 U.S.C. § 1675a(a)(1).

<sup>134</sup> 19 U.S.C. § 1675a(a)(1). Commerce has not made any duty absorption findings with respect to the orders and finding subject to these reviews. *Prestressed Concrete Steel Wire Strand From Brazil, India, Japan, Mexico, Republic of Korea and Thailand: Final Results of Expedited Sunset Reviews of Antidumping Duty Finding and Orders*, 85 Fed. Reg. 39164 (June 30, 2020) and accompanying Issues and Decisions Memorandum at 5, EDIS Doc. 713.678.

<sup>135</sup> 19 U.S.C. § 1675a(a)(5). Although the Commission must consider all factors, no one factor is necessarily dispositive. SAA at 886.

<sup>136</sup> 19 U.S.C. § 1675a(a)(2).

existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) the potential for product shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.<sup>137</sup>

In evaluating the likely price effects of subject imports if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether there is likely to be significant underselling by the subject imports as compared to the domestic like product and whether the subject imports are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic like product.<sup>138</sup>

In evaluating the likely impact of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider all relevant economic factors that are likely to have a bearing on the state of the industry in the United States, including but not limited to the following: (1) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity; (2) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment; and (3) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.<sup>139</sup> All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to which any improvement in the state of the domestic industry is related to the orders and finding under review and whether the industry is vulnerable to material injury upon revocation.<sup>140</sup>

No respondent interested party participated in these expedited reviews. The record, therefore, contains limited new information with respect to the PC strand industry in Brazil, India, Japan, Korea, Mexico, and Thailand. There also is limited information on the PC strand market in the United States during the period of review. Accordingly, for our determinations, we rely as appropriate on the facts available from the original investigations and prior reviews, and the limited new information on the record in these five-year reviews.

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<sup>137</sup> 19 U.S.C. § 1675a(a)(2)(A-D).

<sup>138</sup> See 19 U.S.C. § 1675a(a)(3). The SAA states that “[c]onsistent with its practice in investigations, in considering the likely price effects of imports in the event of revocation and termination, the Commission may rely on circumstantial, as well as direct, evidence of the adverse effects of unfairly traded imports on domestic prices.” SAA at 886.

<sup>139</sup> 19 U.S.C. § 1675a(a)(4).

<sup>140</sup> The SAA states that in assessing whether the domestic industry is vulnerable to injury if the order is revoked, the Commission “considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they may also demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.” SAA at 885.

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

In evaluating the likely impact of the subject imports on the domestic industry if an order is revoked, the statute directs the Commission to consider all relevant economic factors “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”<sup>141</sup> The following conditions of competition inform our determinations.

### **1. Demand Conditions**

In the original investigation concerning subject imports from Japan, the Commission observed that PC strand was used to reinforce concrete units used in the construction of bridge girders, beams, pilings, railroad ties, and a variety of building products, such as columns, roofs, and floors.<sup>142</sup> A peak period of heavy construction in 1973 and 1974 was followed by a recession in 1975, with noticeable improvements in the level of heavy construction and demand appearing in 1977.<sup>143</sup> In its first and second five-year reviews of the finding on subject imports from Japan, the Commission observed that the domestic construction industry had enjoyed a substantial expansion since the original investigation, thus increasing U.S. demand for PC strand.<sup>144</sup>

In the 2004 Original Determinations, the Commission found that apparent U.S. consumption of PC strand declined from 2000 to 2003. The Commission also found that the U.S. market was not strictly segmented based on pre-tensioned versus post-tensioned PC strand applications.<sup>145</sup> In the 2009 Reviews, apparent U.S. consumption of PC strand increased overall but had declined at the end of the review period from the peak in 2006. Most U.S. producers and importers reported that demand was expected to continue to decline in the near term and that any recovery in demand depended on a recovery in construction.<sup>146</sup> The Commission explained that most of the subject imports during the period of review were sold for post-tensioned applications, while the domestic product was sold mostly for pre-tensioned applications. The Commission observed that Buy America(n) provisions continued to account for about one-third of the market and were more prevalent with respect to sales to pre-tensioned customers.<sup>147</sup>

In the 2015 Reviews, the Commission found that the record indicated that PC strand continued to be used in construction applications.<sup>148</sup> Apparent U.S. consumption was \*\*\*

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<sup>141</sup> 19 U.S.C. § 1675a(a)(4).

<sup>142</sup> Japan Original Determination, USITC Pub. 928 at 3-4.

<sup>143</sup> Japan Original Determination, USITC Pub. 928 at A-7-8.

<sup>144</sup> Japan First Review Determination, USITC Pub. 3156 at 6-8; Japan Second Review Determination, USITC Pub. 3669 at 8-10.

<sup>145</sup> 2004 Original Determinations, USITC Pub. 3663 at 16-17.

<sup>146</sup> 2009 Reviews, USITC Pub. 4114 at 24.

<sup>147</sup> 2009 Reviews, USITC Pub. 4114 at 24.

<sup>148</sup> 2015 Reviews, USITC Pub. 4527 at 20.



pounds in 2013, contrasted with 942.7 million pounds in 2008, the end of the first review period.<sup>149</sup>

The record in these reviews indicates that PC strand continues to be used for construction of prestressed concrete structural components for the building of bridge decks, bridge girders, pilings, precast concrete panels and structural supports, roof trusses, floor supports, and certain concrete foundations.<sup>150</sup> Domestic Producers allege that U.S. demand for PC strand showed increasing trends from 2015 to 2019, consistent with the overall trends in construction and the housing market, while demand for PC strand globally has remained fairly steady.<sup>151</sup> Apparent U.S. consumption was greater at \*\*\* pounds in 2019, compared to \*\*\* pounds in 2013 at the end of the prior review period.<sup>152</sup>

## 2. Supply Conditions

In the original investigation concerning subject imports from Japan, the Commission observed that capacity in the United States and other countries had expanded in response to supply shortages in 1973 and 1974.<sup>153</sup> In its first and second five-year reviews of the finding on subject imports from Japan, the Commission observed that the domestic industry was the largest source of supply in the U.S. market, nonsubject imports were the second largest source, and subject imports from Japan had largely exited the market.<sup>154</sup>

In the 2004 Original Determinations, the domestic industry was the largest source of supply to the U.S. market, although its share declined over the period to below 70 percent of the market. Subject imports supplied more than 20 percent of the market, and nonsubject imports supplied less than 10 percent.<sup>155</sup> In the 2009 Reviews, the Commission explained that there had been a number of changes in the identity of the suppliers of PC strand to the U.S. market since the 2004 Original Determinations. Two Mexican PC strand producers had established, then closed, production facilities in the United States. Rettco, a new domestic producer, commenced production in 2005. The domestic industry's capacity grew from 742 million pounds in 2003 to 904 million pounds in 2008, at which time there were five domestic producers of PC strand. Subject imports from Brazil, India, Korea, Mexico, and Thailand largely left the market, or continued at reduced levels, after the imposition of the countervailing and antidumping duty orders in 2004. Nonsubject imports of PC strand from China, however, increased rapidly over the period of review. By 2008, the domestic industry accounted for only

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<sup>149</sup> 2015 Reviews, USITC Pub. 4527 at 20, Confidential Views, EDIS Doc. 708075 at 30.

<sup>150</sup> CR/PR at I-9.

<sup>151</sup> Domestic Producers Final Comments at 5-6.

<sup>152</sup> CR/PR at Table I-6.

<sup>153</sup> Japan Original Determination, USITC Pub. 928 at A-7.

<sup>154</sup> Japan First Review Determination, USITC Pub. 3156 at 6-8; Japan Second Review Determination, USITC Pub. 3669 at 8-10.

<sup>155</sup> 2004 Original Determinations, USITC Pub. 3663 at 17.

56.2 percent of apparent U.S. consumption, whereas nonsubject imports from China accounted for 40.5 percent.<sup>156</sup>

In the 2015 Reviews, the Commission found that the domestic industry accounted for \*\*\* percent of apparent U.S. consumption in 2013.<sup>157</sup> Two new producers entered the U.S. PC strand industry during the review period, and there were also several acquisitions, divestments, and reorganizations of production arrangements within the domestic industry. It further found that subject imports accounted for \*\*\* percent of apparent U.S. consumption in 2013, and nonsubject imports accounted for \*\*\* percent.<sup>158</sup>

The record in these reviews indicates that the domestic industry continues to account for the largest share of the U.S. market, maintaining \*\*\* percent of apparent U.S. consumption in 2019.<sup>159</sup> Nonsubject imports accounted for the next largest share at \*\*\* percent, while cumulated subject imports accounted for \*\*\* percent in 2019.<sup>160 161</sup>

### 3. Substitutability and Other Conditions

In its first and second five-year reviews of the finding on subject imports from Japan, the Commission characterized PC strand as predominantly a commodity product, for which competition was based mostly on price.<sup>162</sup> In the 2004 Original Determinations, the Commission found PC strand to be a largely undifferentiated product that was generally produced in a single form, size, and strength and that subject imports and domestically produced PC strand were generally substitutable, with price being an important factor in

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<sup>156</sup> 2009 Reviews, USITC Pub. 4114 at 25, Table C-1.

<sup>157</sup> 2015 Reviews, USITC Pub. 4527 at 21, Confidential Views, EDIS Doc. 708075 at 32.

<sup>158</sup> 2015 Reviews, USITC Pub. 4527 at 21, Confidential Views, EDIS Doc. 708075 at 32.

<sup>159</sup> CR/PR at Table I-6.

<sup>160</sup> CR/PR at Table I-6. We observe that in May 2020, we issued preliminary determinations that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of PC strand from Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, Turkey, Ukraine, and United Arab Emirates (“UAE”) that are alleged to be sold in the United States at less than fair value and to be subsidized by the government of Turkey. *Prestressed Concrete Steel Wire Strand from Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, Turkey, Ukraine, and United Arab Emirates*, Inv. Nos. 701-TA-646 and 731-TA-1502-1516 (Preliminary), EDIS Doc. 712026.

<sup>161</sup> Domestic producers assert that the domestic industry “remains well-positioned to supply current U.S. demand, and respond to changes in future U.S. demand, due to its \*\*\* and large inventories.” They contend, however, that increasing demand in the United States, coupled with steady demand in the global market, is likely to result in increased exports of excess subject foreign supply to the U.S. market upon revocation. Domestic Producers Final Comments at 5-6.

<sup>162</sup> Japan First Review Determination, USITC Pub. 3156 at 6-8; Japan Second Review Determination, USITC Pub. 3669 at 8-10.

purchasing decisions.<sup>163</sup> It observed that Buy America(n) restrictions or preferences applied to about 30 percent of the entire U.S. PC strand market, largely in pre-tensioned applications.<sup>164</sup>

In the 2009 Reviews, the Commission explained that market participants found subject imports from Brazil, India, Japan, Korea, Mexico, and Thailand to be generally interchangeable with one another and with the domestic like product. Approximately one-third of the domestic PC strand market was subject to Buy America(n) restrictions during the period of review, which was about the same proportion as in the 2004 original investigations. The Commission noted that wire rod costs were an important component of the total cost of producing PC strand and that global prices of wire rod increased at the beginning of 2008, peaked in August of that year, and then declined to pre-2008 levels.<sup>165</sup>

In the 2015 Reviews, the Commission found that the available record information did not indicate that the substitutability between subject imports and domestic like product and among subject imports from the various subject countries had changed since the prior investigations and reviews. Accordingly, it again found subject imports to be generally substitutable for one another and for the domestic like product and found price to be an important factor in purchasing decisions.<sup>166</sup>

In these reviews, Domestic Producers argue that the conditions of competition identified in the prior reviews continue to exist today. They contend that due to the substitutable nature of the product, the U.S. market for PC strand remains highly price-sensitive, which in their view will allow subject producers to regain sales in the U.S. market by underselling the domestic like product, as they did before imposition of the orders and finding.<sup>167</sup> The record in these expedited reviews contains no additional information to indicate that either the substitutability between the domestic like product and subject imports or the importance of price has changed since the prior proceedings. Therefore, we continue to find that subject imports generally are substitutable for one another and for the domestic like product and that price is an important factor in purchasing decisions.

### **C. Likely Volume of Subject Imports**

#### **1. Original Investigation and First Two Reviews of PC Strand from Japan**

In the original investigation of PC strand from Japan, the Commission observed that, despite an overall decline in the volume of subject imports over the period of investigation, imports from Japan held over 60 percent of the U.S. market in both 1976 and 1977.<sup>168</sup> In its first five-year review, the Commission found that capacity in Japan far exceeded domestic demand and that Japan and other Asian countries were experiencing a severe recession, while

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<sup>163</sup> 2004 Original Determinations, USITC Pub. 3663 at 17-18.

<sup>164</sup> 2004 Original Determinations, USITC Pub. 3663 at 18.

<sup>165</sup> 2009 Reviews, USITC Pub. 4114 at 25-26.

<sup>166</sup> 2015 Reviews, USITC Pub. 4527 at 22.

<sup>167</sup> Domestic Producers Final Comments at 5-6.

<sup>168</sup> Japan Original Determination, USITC Pub. 928 at 5.

demand for PC strand in the United States was strong. The Commission also found that Japanese producers' exports to the United States fell sharply after the antidumping duty finding was in place and that the likely volume of imports from Japan would be significant and increase significantly if the finding were revoked.<sup>169</sup>

In its second five-year review, the Commission noted that Japanese producers subject to the finding continued to have substantial excess capacity and that the exportation of even a limited amount of this capacity to the United States would likely result in significant increases in subject import volumes. It found that the then-prevailing buoyant construction activity in the United States and sluggish demand in Japan created incentives for Japanese producers to target the U.S. market. The Commission also explained that the recent imposition of antidumping duties on imports of PC strand from Brazil, India, Korea, Mexico, and Thailand and countervailing duties on imports from India would create an opening for subject imports from Japan to reenter the market if the finding on Japan were revoked. The Commission accordingly found that subject imports likely would be significant, both in absolute terms and relative to production and consumption in the United States, if the finding were revoked.<sup>170</sup>

## **2. Original Investigations on PC Strand from Brazil, India, Korea, Mexico, and Thailand**

In the 2004 Original Determinations, the Commission found that the volume of cumulated subject imports from Brazil, India, Korea, Mexico, and Thailand increased during the period of investigation from 118.6 million pounds in 2000 to 129.2 million pounds in 2001, then jumped sharply to 164.9 million pounds in 2002. Their market share increased from 15.1 percent of the U.S. market in 2000 to 22.0 percent in 2002. The Commission observed that subject imports were focused on sales to post-tensioned customers, where they displaced domestic producers from a significant volume of sales. The Commission found the volume of subject imports, both in absolute terms and relative to production and consumption in the United States, as well as the increase in that volume, to be significant.<sup>171</sup>

## **3. The 2009 Five-Year Reviews**

In the 2009 five-year reviews of the orders and finding regarding all six subject countries, the Commission found that several factors supported the conclusion that cumulated subject import volume was likely to be significant in the event of revocation. First, it found that the aggregate estimated production capacity in the subject countries was considerable, growing by 20 percent since the original investigations, from 1.04 billion pounds in 2002/2003 to 1.25 billion pounds in 2008/2009. Second, although the Commission was unable to quantify precisely the unused production capacity in the subject countries because of the failure of many subject producers to respond to the Commission's questionnaire, it was clear that the

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<sup>169</sup> Japan First Review Determination, USITC Pub. 3156 at 8-10.

<sup>170</sup> Japan Second Review Determination, USITC Pub. 3699 at 10-12.

<sup>171</sup> 2004 Original Determinations, USITC Pub. 3663 at 18-20.

excess capacity had become substantial, given reporting of decreased capacity utilization by producers in \*\*\* and the deepening effects of the worldwide economic slowdown. The Commission found that the aggregate excess capacity would likely provide a strong incentive for producers of PC strand in the subject countries to increase shipments to export markets, including the United States, if the orders and the finding were revoked. Third, the Commission observed that the record in the original investigations indicated that the PC strand industries in at least some of the subject countries depended to a significant degree on exports and there was no information in the record suggesting that those countries had directed their focus away from exports. Finally, the Commission found that the United States was an attractive market for foreign producers because of its size, with the United States being the world's largest importer of iron or steel stranded wire, ropes, cables, and cordage during the period of review. Accordingly, based on the demonstrated ability of the PC strand producers in the subject countries to increase imports into the U.S. market rapidly, their substantial production capacity and unused capacity, and the attractiveness of the U.S. market, the Commission found that the likely volume of subject imports, both in absolute terms and as a share of the U.S. market, would be significant in the event of revocation.<sup>172</sup>

#### **4. The 2015 Five-Year Reviews**

In the 2015 Reviews, the Commission found that the available information indicated that the finding on subject imports from Japan in 1978 and the orders on subject imports from Brazil, India, Korea, Mexico, and Thailand in 2004 had disciplining effects on the volume of subject imports, which decreased significantly since the imposition of the finding and orders. It observed that subject imports from Japan were 176.5 million pounds in 1977, and those from the other five subject countries reached 164.9 million pounds in 2002; by contrast, for the six countries subject to the 2015 reviews, cumulated subject imports were 6.4 million pounds in 2008 and 4.2 million pounds in 2013.<sup>173</sup> Noting that no producer or exporter of subject merchandise participated in the 2015 expedited reviews, the Commission nevertheless found that the available record data indicated that the industries in subject countries continued to manufacture and export substantial volumes of stranded wire, ropes, and cables, which includes PC strand. The Commission observed that there was no information in the record suggesting a decline in subject producers' capacity or unused capacity since the prior reviews, and consequently, on the basis of the facts available, it found that the subject producers continued to have substantial capacity and excess capacity and continued to depend on exports to a significant degree.<sup>174</sup> The Commission further found that the United States was a large and attractive market to the PC strand industries in the subject countries, observing that PC strand from each of the subject countries had been present in the U.S. market to some extent since imposition of the orders and finding, albeit at substantially lower quantities and in some cases

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<sup>172</sup> 2009 Reviews, USITC Pub. 4114 at 27-28; 2015 Reviews, 2015 Reviews, USITC Pub. 4527 at 24, Confidential Views, EDIS Doc. 708075 at 35-36.

<sup>173</sup> 2015 Reviews, USITC Pub. 4527 at 24.

<sup>174</sup> 2015 Reviews, USITC Pub. 4527 at 24.

intermittently.<sup>175</sup> Accordingly, based on the demonstrated ability of the PC strand producers in the subject countries to increase imports into the U.S. market rapidly, their substantial production capacity and unused capacity, and the attractiveness of the U.S. market, the Commission determined that the likely volume of subject imports, both in absolute terms and as a share of the U.S. market, would be significant in the event of revocation.<sup>176</sup>

## 5. The Current Reviews

The information available in the current reviews indicates that the orders and finding continue to have disciplining effects on the volume of subject imports. As discussed above, prior to the finding and orders, the volume of subject imports from Japan was 176.5 million pounds in 1977 and the cumulated volume of subject imports from the other five subject countries reached 164.9 million pounds in 2002. By contrast, the volume of cumulated subject imports was 4.7 million pounds in 2014, 2.9 million pounds in 2015, 654,000 pounds in 2016, 355,000 pounds in 2017, 9.2 million pounds in 2018, and 3.3 million pounds in 2019.<sup>177</sup>

As in the prior reviews, no producer or exporter of subject merchandise participated in these expedited reviews. However, available evidence indicates that a substantial number of subject producers/exporters remain actively engaged in the production and/or export of PC strand.<sup>178</sup> There is no information in the current record suggesting a decline in subject producers' capacity or unused capacity since the prior reviews. Moreover, as discussed in section III.C. above, GTA data show that producers in subject countries continue to manufacture and export substantial volumes of products under HTS subheading 7312.10, which includes PC strand as well as out-of-scope merchandise.<sup>179</sup> GTA data further show that some of the subject countries are among the major single-country sources of global exports of products under HTS subheading 7312.10.<sup>180</sup> Consequently, on the basis of the facts available, we find that the subject producers continue to have substantial capacity and excess capacity and that, on a cumulated basis, the PC strand industries in the subject countries continue to depend on exports to a certain degree.

The available record evidence further indicates that the United States continues to be an attractive market for subject imports. Notwithstanding the orders and finding, cumulated subject imports maintained their presence in the United States throughout the period of review, showing that subject producers remain interested in, and able to sell to, the U.S. market.

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<sup>175</sup> 2015 Reviews, USITC Pub. 4527 at 24.

<sup>176</sup> 2015 Reviews, USITC Pub. 4527 at 24.

<sup>177</sup> CR/PR at Table I-5.

<sup>178</sup> Domestic Producers Final Comments at 6, 9-10. Domestic Producers identified 79 firms in the subject countries that they maintain produce and/or export PC strand. *Id.*

<sup>179</sup> CR/PR at Tables I-8 – I-13.

<sup>180</sup> CR/PR at Table I-14. Korea, Thailand, and India are among the major sources of global exports of products under HTS subheading 7312.10. *Id.*

Based on subject producers' behavior during the original investigations, the continued presence of subject imports in the United States despite the orders and finding, the production and export activities of producers in subject countries, and the attractiveness of the United States as an import market, we conclude that the volume of cumulated subject imports, both in absolute terms and relative to U.S. consumption, would likely be significant if the orders and finding were revoked.<sup>181</sup>

#### **D. Likely Price Effects**

##### **1. Original Investigation and First Two Reviews of PC Strand from Japan**

In the original investigation of subject imports from Japan, the Commission found that those imports consistently undersold the domestic product for most of the period examined, resulting in lost sales and price depression.<sup>182</sup> In its first five-year review, although the record contained little pricing data, the Commission observed that the commodity nature of the product resulted in largely price-based competition, which was of particular significance in light of the narrowing of products commonly sold since the original investigation. The Commission further noted that average unit values for domestic shipments were declining despite generally high demand levels and that, in the event of revocation, subject producers likely would win sales by discounting from prevailing price levels. The Commission therefore concluded that significant underselling was likely in the event the finding were revoked and that such pricing practices would likely have a significant depressing or suppressing effect on domestic prices.<sup>183</sup>

In its second five-year review, the Commission found that, given the importance of price in the PC strand market, the interchangeability of subject imports and domestically produced PC strand, the likely significant volume of subject imports, the likely significant underselling by such imports, the pricing practices demonstrated in the original investigation, and the incentives for subject imports to enter the U.S. market, significant volumes of PC strand from Japan likely would significantly undersell the domestic like product to gain market share and likely would have significant depressing or suppressing effects on the prices of the domestic like product if the antidumping duty finding were revoked.<sup>184</sup>

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<sup>181</sup> Due to the lack of participation by subject producers in these reviews, there is no information available that addresses existing inventories of subject merchandise or the potential for product-shifting by the PC strand industries in the subject countries. We also note that PC strand is not subject to antidumping or countervailing duty orders in any other country. CR/PR at I-33. PC strand from Korea was previously subject to an antidumping duty order and PC strand from India was subject to a countervailing duty order in South Africa; however, these orders were terminated in 2014. CR/PR at I-33 – I-34.

<sup>182</sup> Japan Original Determination, USITC Pub. 928 at 6.

<sup>183</sup> Japan First Review Determination, USITC Pub. 3156 at 10-11.

<sup>184</sup> Japan Second Review Determination, USITC Pub. 3699 at 12-14.

## **2. Original Investigations on PC Strand from Brazil, India, Korea, Mexico, and Thailand**

In the 2004 Original Determinations, the Commission found that significant injurious price effects resulted from the subject imports underselling domestically produced PC strand. The Commission found that the record on underselling by subject imports was mixed but found, on balance, that “significant volumes of the subject merchandise depressed U.S. prices, resulted in substantial lost sales and lost revenues, and had significant adverse price effects on the U.S. industry.”<sup>185</sup>

## **3. The 2009 Five-Year Reviews**

In the 2009 five-year reviews involving all six subject countries, the Commission found that price remained an important factor in the purchase of PC strand and that, even under the discipline of the finding and the orders, the pricing data for the review period indicated a mixture of overselling and underselling by subject imports. Given the likely significant volume of cumulated subject imports, the importance of price in the PC strand market, the interchangeability of subject imports and the domestic like product, the adverse price effects of low-priced imports in the original investigations and the two reviews of subject imports from Japan, and the underselling that occurred during the period of review even with the finding and the orders in place, the Commission found that cumulated subject imports likely would significantly undersell the domestic like product to gain market share and likely would have significant depressing and/or suppressing effects on the prices of the domestic like product, if the orders and the finding under review were revoked.<sup>186</sup>

## **4. The 2015 Five-Year Reviews**

In the 2015 Reviews, the Commission continued to find that subject imports were substitutable for each other and for PC strand manufactured in the United States and that price was an important factor in purchasing decisions. Although the record did not contain current pricing comparisons due to the expedited nature of the reviews, the Commission found, based on the available information, that, if the orders and the finding under review were revoked, significant volumes of cumulated subject imports would significantly undersell the domestic like product to gain market share. It further found that the significant volume of cumulated subject imports likely would have significant depressing and/or suppressing effects on the prices of the domestic like product, given the interchangeability of subject imports and the domestic like product and the importance of price in purchasing decisions for PC strand as well as the adverse price effects of low-priced imports in the original investigations and the underselling that was observed in the 2009 Reviews.<sup>187</sup>

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<sup>185</sup> 2004 Original Determinations, USITC Pub. 3663 at 20-24.

<sup>186</sup> 2009 Reviews, USITC Pub. 4114 at 30.

<sup>187</sup> 2015 Reviews, USITC Pub. 4527 at 26.



## **5. The Current Reviews**

As discussed above, we continue to find that subject imports generally are substitutable for each other and for PC strand manufactured in the United States and that price is an important factor in purchasing decisions. Due to the expedited nature of these reviews, the record does not contain current pricing comparisons. We have found, however, that the volume of cumulated subject imports would likely increase significantly upon revocation of the orders and finding. Given the importance of price in purchasing decisions for PC strand and the interchangeability of subject imports and the domestic like product, we find that, if the orders and finding under review were revoked, the likely significant volumes of cumulated subject imports likely would significantly undersell the domestic like product, as was observed in the previous proceedings. This would likely result in cumulated subject imports gaining sales and market share at the expense of the domestic industry or having depressing or suppressing effects on prices for the domestic like product by forcing the domestic industry to lower prices, forego price increases, or risk losing market share. In light of these considerations, we conclude that subject imports would likely have significant price effects upon revocation of the orders and finding.

### **E. Likely Impact**

#### **1. Original Investigation and First Two Reviews of PC Strand from Japan**

In the original investigation of imports from Japan, the Commission found that the domestic industry was being injured by reason of subject imports from Japan. The industry experienced a declining rate of capacity utilization, a decrease in shipments, an increase in inventories, a drop in employment, and a precipitous decline in profitability between 1974 and 1977. The ratio of operating profit or loss to net sales for domestic producers dropped from a profit of about 20 percent in both 1974 and 1975 to a loss of 3 percent in 1976 and an even greater loss of 7 percent in 1977, the year in which the Treasury Department, which at the time made dumping determinations, found that imports from Japan were sold at less than fair value.<sup>188</sup>

In its first five-year review, the Commission found that the domestic industry was experiencing a cost-price squeeze in a highly competitive, price-based market supplied by some two dozen other sources that were contributing to an environment of declining prices. The Commission found that the domestic industry was vulnerable to material injury in this environment. It concluded that subject imports would likely have significant negative effects on the domestic industry's prices, output, profitability, capacity utilization, cash flow, and ability to raise capital and make future investments within a reasonably foreseeable time if the finding were revoked.<sup>189</sup>

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<sup>188</sup> Japan Original Determination, USITC Pub. 928 at 4-6.

<sup>189</sup> Japan First Review Determination, USITC Pub. 3156 at 11-14.

In its second five-year review, the Commission found that the domestic industry was vulnerable to further injury if the antidumping duty finding on subject imports from Japan were revoked. The Commission concluded that subject imports would likely have significant negative effects on the domestic industry's prices, output, profitability, capacity utilization, cash flow, and ability to raise capital and make future investments within a reasonably foreseeable time if the finding were revoked.<sup>190</sup>

## **2. 2004 Original Determinations**

In the 2004 Original Determinations, the Commission found that most indicators of the domestic industry's condition showed marked declines between 2000 and 2002 at a rate greater than the decline in apparent U.S. consumption. It attributed the domestic industry's performance declines in significant part to the increases in subject import volume and market share that had significant price-depressing effects. It explained that Buy America(n) restrictions did not detract from its finding that subject imports had significant price effects, particularly insofar as Buy America(n) sales accounted for only approximately 30 percent of the domestic market. The Commission observed that the vast majority of subject imports were for post-tensioned sales, where subject imports had increased their sales rapidly and at the expense of domestic producers. Although subject imports accounted for only a small share of pre-tensioned sales, they had at least some impact on those sales, persistently underselling the domestic product and resulting in both lost sales and lost revenue.<sup>191</sup>

## **3. 2009 Five-Year Reviews**

In the 2009 five-year reviews involving all six subject countries, the Commission found that the condition of the domestic industry generally improved in the years 2003 through 2006 and then declined in 2007 and 2008, before deteriorating dramatically in interim 2009 with respect to net sales, capacity, capacity utilization, number of production and related workers, hours worked, and productivity. The domestic industry's financial performance followed a similar pattern, with gross profits and operating income surging from 2003 to 2004, reaching a peak in 2005, then declining in subsequent years and turning to losses in interim 2009. The domestic industry's operating income margin increased from 3.4 percent in 2003 to 17.0 percent in 2004 and then declined to 10.7 percent in 2008. It was 15.9 percent in interim 2008 and negative 7.5 percent in interim 2009. The domestic industry's capital expenditures increased irregularly from 2003 to 2006 and then declined irregularly.<sup>192</sup>

Based on the record in the 2009 Reviews, the Commission concluded that revocation of the orders and the finding would likely lead to a significant increase in the volume of subject imports that would likely undersell the domestic like product and significantly suppress or depress U.S. prices. The Commission also found that the volume and price effects of the

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<sup>190</sup> Japan Second Review Determination, USITC Pub. 3699 at 14-15.

<sup>191</sup> 2004 Original Determinations, USITC Pub. 3663 at 24-27.

<sup>192</sup> 2009 Reviews, USITC Pub. 4114 at 32-33.

subject imports would likely have a significant adverse impact on the production, shipments, sales, market share, and revenues of the domestic industry. It found that these reductions would have a direct adverse impact on the industry's profitability and employment as well as its ability to raise capital and make and maintain necessary capital investments. Thus, it concluded that if the antidumping duty orders, the countervailing duty order, and the antidumping duty finding were revoked, likely subject imports from Brazil, India, Japan, Korea, Mexico, and Thailand would be likely to have a significant adverse impact on the domestic industry within a reasonably foreseeable time.<sup>193</sup>

The Commission also considered the likely role of nonsubject imports in the U.S. market, which were increasingly imports of PC strand from China, then subject to ongoing antidumping and countervailing duty investigations. The Commission found that the increasing presence of nonsubject imports had likely heightened the price sensitivity of the domestic PC strand market, but that those nonsubject imports were not likely to prevent subject imports from reentering the U.S. market in the event of the revocation of the antidumping duty orders, the countervailing duty order, and the antidumping finding. The Commission found that the presence of imports of PC strand from China did not diminish the attractiveness of the U.S. market to producers in the subject countries, especially given the large amount of unused capacity in those countries. Accordingly, the Commission found that subject imports were likely to have a significant adverse impact upon the domestic industry in the event of revocation, notwithstanding the presence of nonsubject imports in the U.S. market.<sup>194</sup>

The Commission found that subject imports were likely to have a significant adverse impact upon the domestic industry in the event of revocation notwithstanding any shielding effect of Buy America(n) provisions.<sup>195</sup> The Commission also discounted the significance of the fact that the majority of the domestic industry's shipments had been for pre-tensioned applications while the limited volume of subject imports had been mostly for post-tensioned applications. The Commission emphasized that the same product is sold for both types of applications, and that the domestic industry also sold PC strand for post-tensioned applications and expressed an interest in increasing those sales.<sup>196</sup> Finally, in considering the likely future

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<sup>193</sup> 2009 Reviews, USITC Pub. 4114 at 33.

<sup>194</sup> 2009 Reviews, USITC Pub. 4114 at 33-34. The Commission ultimately made affirmative determinations in the investigations of PC strand from China. *Prestressed Concrete Steel Wire Rod from China*, Inv. Nos. 701-TA-464 and 731-TA-1160 (Final), USITC Pub. 4162 (June 2010). Commerce subsequently issued countervailing and antidumping duty orders on subject imports of PC Strand from China. *Prestressed Concrete Steel Wire Rod from China*, 75 Fed. Reg. 38977 (Jul. 7, 2010) (countervailing duty order), 75 Fed. Reg. 37382 (Jun. 29, 2010) (antidumping duty order).

<sup>195</sup> The Commission also noted that subject imports increased and gained market share while demand declined during the period covered by the investigations leading to the 2004 Original Determinations. 2009 Reviews, USITC Pub. 4114 at 35.

<sup>196</sup> 2009 Reviews, USITC Pub. 4114 at 34. It further observed that the ability of imports to gain market share in post-tensioned applications may have been due, in part, to the lower proportion of Buy America(n) sales in those applications and the greater ability of importers to sell to larger customers in larger quantities. The Commission found that neither of these factors supported the view that the (Continued...)

effects of suppressed demand for PC strand on the domestic industry, the Commission found that subject imports would be likely to have a significant adverse impact on the domestic industry in the event of revocation regardless of demand levels.<sup>197</sup>

#### 4. The 2015 Five-Year Reviews

In the 2015 Reviews, the Commission found that the limited record was insufficient for it to make a finding on whether the domestic industry was vulnerable to the continuation or recurrence of material injury in the event of revocation of the finding/orders.<sup>198</sup> It discussed the available performance indicators and observed that domestic producers maintained that the antidumping duty finding and orders and the countervailing duty order led to increases in its production, sales, U.S. shipments, market share, capital investment, and operating performance. Based on the information on the record, the Commission found that, should the orders and finding be revoked, the likely significant volume of subject imports that would likely significantly undersell the domestic like product would likely have a significant adverse impact on the production, shipments, sales, market share, and revenues of the domestic industry. It further found that these declines would likely have a direct adverse impact on the domestic industry's profitability.

The Commission also considered the role of factors other than subject imports, including the presence of nonsubject imports, so as not to attribute injury from other factors to the subject imports. It found that imports of PC strand from nonsubject countries had been present in substantial quantities in the U.S. market since the finding on subject imports from Japan and the orders on subject imports from Brazil, India, Korea, Mexico and Thailand were imposed. It observed, however, that, notwithstanding the increase in nonsubject imports during the review period, the domestic industry was able to increase its market share and to maintain \*\*\* operations in 2013. The Commission therefore concluded that the likely adverse effects of revocation that it had identified were not attributable to nonsubject imports.<sup>199</sup>

Accordingly, the Commission concluded that, if the countervailing duty order, antidumping duty orders, and antidumping duty finding were revoked, likely cumulated subject

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(...Continued)

domestic industry had abandoned, was not interested in, or was unable to serve post-tensioned applications. It found that all evidence was to the contrary. Thus, the Commission found that subject imports were likely to have a significant adverse impact upon the domestic industry in the event of revocation, notwithstanding the concentration of the domestic product and subject imports in sales for different applications. 2009 Reviews, USITC Pub. 4114 at 35.

<sup>197</sup> 2009 Reviews, USITC Pub. 4114 at 35.

<sup>198</sup> 2015 Reviews, USITC Pub. 4527 at 30. Vice Chairman Pinkert found that the domestic industry was not vulnerable to the continuation or recurrence of material injury in the event of revocation of the orders and finding. *Id.* at n.142.

<sup>199</sup> 2015 Reviews, USITC Pub. 4527 at 30-31; Confidential Views, EDIS Doc. 708075 at 47-48. The Commission also observed that no assertions had been made in those expedited reviews of causes of likely injury other than the subject imports. *Id.* at n.150.

imports would likely have a significant adverse impact on the domestic industry within a reasonably foreseeable time.<sup>200</sup>

## 5. The Current Reviews

Due to the nature of expedited reviews, the record contains limited information on the domestic industry's condition, which consists of the data that Domestic Producers provided in response to the notice of institution. In 2019, the domestic industry's production capacity was \*\*\* pounds, its production was \*\*\* pounds, and its capacity utilization rate was \*\*\* percent.<sup>201</sup> The industry's domestic shipments were \*\*\* pounds.<sup>202</sup> Its net sales revenue was \$\*\*\*. Its gross profits were \$\*\*\*, and its operating income was \$\*\*\*, with an operating income margin of \*\*\* percent.<sup>203</sup> The limited record in these reviews contains insufficient information for us to determine whether the domestic industry is vulnerable to the continuation or recurrence of material injury in the event of revocation of the orders and finding.

Based on the information available in these reviews, we find that revocation of the orders and finding would likely lead to a significant volume of cumulated subject imports and that these imports would likely undersell the domestic like product to a significant degree, resulting in significant depression or suppression of prices for the domestic like product and/or a loss of market share for the domestic industry. This, in turn, would adversely impact its production, shipments, sales, and revenue. These reductions would likely have a direct adverse impact on the domestic industry's profitability and employment levels, as well as its ability to raise capital and make and maintain necessary capital investments.

We have also considered the role of factors other than subject imports, including the presence of nonsubject imports, so as not to attribute likely injury from other factors to the subject imports. The volume of nonsubject imports increased since the last reviews, and imports from nonsubject countries were the second largest source of PC strand to the U.S. market in 2019, accounting for \*\*\* percent of apparent U.S. consumption by quantity in 2019.<sup>204</sup> We observe, however, as discussed above, that nonsubject imports of PC strand from China are currently subject to antidumping and countervailing duty orders. In addition, nonsubject imports from Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, Turkey, Ukraine, and UAE are currently subject to ongoing antidumping duty proceedings, and PC strand from Turkey is also subject to ongoing countervailing duty proceedings; the Commission recently made affirmative preliminary determinations in these antidumping and countervailing duty investigations.<sup>205</sup>

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<sup>200</sup> 2015 Reviews, USITC Pub. at 31.

<sup>201</sup> CR/PR at Table I-4.

<sup>202</sup> CR/PR at Table I-4.

<sup>203</sup> CR/PR at Table I-4.

<sup>204</sup> CR/PR at Table I-6.

<sup>205</sup> See *Prestressed Concrete Steel Wire Strand from Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, Turkey, Ukraine, and United* (Continued...)

Further, there is no indication or argument on this record that the presence of nonsubject imports would prevent subject imports from Brazil, India, Japan, Korea, Mexico, and Thailand from significantly increasing their presence in the U.S. market or having price depressing or suppressing effects in the event of revocation of the orders and finding. Given the degree of substitutability between the subject imports and the domestic like product and the importance of price, and the fact that the domestic industry supplies the majority of the U.S. market, the likely increase in cumulated subject imports in the event of revocation would likely take market share from the domestic industry or have price depressing or suppressing effects. Therefore, the subject imports are likely to have adverse effects on the domestic industry, distinct from any adverse effects nonsubject imports may have on the domestic industry, in the event of revocation.

Accordingly, we conclude that, if the orders and finding were revoked, likely cumulated subject imports would likely have a significant adverse impact on the domestic industry within a reasonably foreseeable time.

## **V. Conclusion**

For the above reasons, we determine that revocation of the countervailing duty order on PC strand from India, the antidumping duty orders on PC strand from Brazil, India, Korea, Mexico, and Thailand, and the antidumping duty finding on PC strand from Japan would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

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(...Continued)

*Arab Emirates*, Inv. Nos. 701-TA-646 and 731-TA-1502-1516 (Preliminary), EDIS Doc. 712026. One of the purchasers responding to the questionnaire in these reviews stated that it \*\*\*. CR/PR at Appendix D-3.

# Information obtained in these reviews

## Background

On March 2, 2020, the U.S. International Trade Commission (“Commission”) gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”),<sup>1</sup> that it had instituted reviews to determine whether revocation of antidumping duty orders on prestressed concrete steel wire strand (“PC strand”) from Brazil, India, Korea, Mexico, and Thailand, and the antidumping finding on PC strand from Japan, as well as revocation of the countervailing duty order on PC strand from India, would be likely to lead to continuation or recurrence of material injury.<sup>2</sup> All interested parties were requested to respond to this notice by submitting certain information requested by the Commission.<sup>3 4</sup> The following tabulation presents information relating to the background and schedule of this proceeding:

<b>Effective date</b>	<b>Action</b>
March 1, 2020	Notice of initiation by Commerce (85 FR 12253, March 2, 2020)
March 2, 2020	Notice of institution by Commission (85 FR 12331, March 2, 2020)
June 5, 2020	Commission’s vote on adequacy
June 30, 2020	Commerce’s results of its expedited reviews
October 28, 2020	Commission’s determinations and views

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<sup>1</sup> 19 U.S.C. 1675(c).

<sup>2</sup> 85 FR 12331, March 2, 2020. In accordance with section 751(c) of the Act, the U.S. Department of Commerce (“Commerce”) published a notice of initiation of five-year reviews of the subject antidumping and countervailing duty orders and antidumping finding. 85 FR 12253, March 2, 2020. Pertinent Federal Register notices are referenced in app. A, and may be found at the Commission’s website ([www.usitc.gov](http://www.usitc.gov)).

<sup>3</sup> As part of their response to the notice of institution, interested parties were requested to provide company-specific information. That information is presented in app. B. Summary data compiled in prior proceedings are presented in app. C.

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

## Responses to the Commission’s notice of institution

### Individual responses

The Commission received one submission in response to its notice of institution in the subject reviews. It was filed on behalf of Insteel Wire Products Company (“Insteel”), Sumiden Wire Products Corporation (“Sumiden”), and WMC Steel, LLC (“WMC”), domestic producers of PC strand (collectively referred to herein as “domestic interested parties”).

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

**Table I-1**  
**PC strand: Summary of responses to the Commission’s notice of institution**

Type of interested party	Completed responses	
	Number of firms	Coverage
Domestic:		
U.S. producer	3	***%

Note: The U.S. producer coverage figure presented is the estimated share of total U.S. production of PC strand in 2019 accounted for by the three responding firms. Insteel acquired Strand-Tech Manufacturing (“Strand-Tech”), a U.S. producer of PC strand, in March 2020, and provided Strand-Tech’s 2019 production data in its response to the notice of institution. Thus, Strand-Tech’s 2019 production is also included in the coverage figure. The estimate was calculated as the quantity of reported production for Insteel, Sumiden, WMC, and Strand-Tech (\*\*\*) pounds) divided by total U.S. production derived from the domestic interested parties’ estimates (\*\*\*) pounds). Domestic interested parties’ response to the notice of institution, March 30, 2020, pp. 1 and 21-22.

### Party comments on adequacy

The Commission received party comments on the adequacy of responses to the notice of institution and whether the Commission should conduct expedited or full reviews from the domestic interested parties. The domestic interested parties request that the Commission conduct expedited reviews of the antidumping duty finding/orders and countervailing duty order on PC strand.<sup>5</sup>

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<sup>5</sup> Domestic interested parties’ comments on adequacy, May 14, 2020, p. 2.



## The original investigations and subsequent reviews

### The original investigation (Japan)

The Commission instituted an antidumping duty investigation concerning PC strand from Japan on August 29, 1978, following notification from the Department of Treasury (“Treasury”) on August 22, 1978, that steel wire strand from Japan was being, or was likely to be, sold in the United States at less than fair value (“LTFV”) within the meaning of the Antidumping Act, 1921, as amended.<sup>6</sup> Treasury published its final determination of sales at LTFV on August 28, 1978, with the final weighted-average dumping margins ranging from 0.62 to 15.8 percent.<sup>7</sup> The Commission made its final affirmative injury determination on November 16, 1978, and Treasury issued an antidumping duty finding on imports of PC strand from Japan on December 8, 1978.<sup>8 9</sup>

### The first five-year review (Japan)

On December 4, 1998, the Commission determined that it would conduct an expedited review of the antidumping finding on PC strand from Japan.<sup>10</sup> On January 6, 1999, Commerce determined that the revocation of the antidumping finding on PC strand from Japan would be likely to lead to continuation or recurrence of dumping.<sup>11</sup> On January 22, 1999, the Commission determined that the revocation of the antidumping finding on PC strand from Japan would be likely to lead to continuation or recurrence of material injury to an industry in the United States

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<sup>6</sup> 19 U.S.C. 160(a); and 43 FR 39454, September 5, 1978. The petition which led to Treasury’s determination of LTFV sales was filed on behalf of the following five domestic producers of PC strand: American Spring Wire Corp., Bedford Heights, Ohio; Armco Steel Corp., Middletown, Ohio; Bethlehem Steel Corp., Bethlehem, Pennsylvania; CF&I Steel Corp., Pueblo, Colorado; and Florida Wire & Cable Co., Jacksonville, Florida. Steel Wire Strand for Prestressed Concrete from Japan, Inv. No. AA1921-188, USITC Publication 928, November 1978 (“Original Japan 1978 publication”), p. A-3.

<sup>7</sup> Kawatetsu Wire Products Co., Ltd., a Japanese producer of steel wire strand, was excluded from Treasury’s original Japan determination because its weighted-average margin of 0.62 percent was considered minimal in relation to the total volume of its sales and because the firm gave formal assurances that it would make no future sales at LTFV. 43 FR 38495, August 28, 1978; and 43 FR 55826, November 29, 1978.

<sup>8</sup> 43 FR 55826, November 29, 1978; and 43 FR 57599, December 8, 1978.

<sup>9</sup> In 1986, Commerce revoked the antidumping duty finding for Sumitomo Electric Industries, Ltd. (“Sumitomo”), a Japanese producer of PC strand. 51 FR 30894, August 29, 1986.

<sup>10</sup> 63 FR 70158, December 18, 1998.

<sup>11</sup> 64 FR 857, January 6, 1999.

within a reasonably foreseeable time.<sup>12</sup> Following affirmative determinations in the five-year review by Commerce and the Commission, effective February 3, 1999, Commerce issued a continuation of the antidumping finding on imports of PC strand from Japan.<sup>13</sup>

### **The second five-year review (Japan)**

On April 6, 2004, the Commission determined that it would conduct an expedited review of the antidumping finding on PC strand from Japan.<sup>14</sup> On May 7, 2004, Commerce determined that the revocation of the antidumping finding on PC strand from Japan would be likely to lead to continuation or recurrence of dumping.<sup>15</sup> On June 7, 2004, the Commission determined that the revocation of the antidumping finding on PC strand from Japan would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.<sup>16</sup> Following affirmative determinations in the five-year review by Commerce and the Commission, effective June 25, 2004, Commerce issued a continuation of the antidumping finding on imports of PC strand from Japan.<sup>17</sup>

### **The original investigations (Brazil, India, Korea, Mexico, and Thailand)**

The original investigations resulted from petitions filed on January 31, 2003 with Commerce and the Commission by American Spring Wire Corp., Bedford Heights, Ohio; Insteel, Mt. Airy, North Carolina; and Sumiden, Stockton, California.<sup>18</sup> On December 8, 2003, Commerce determined that imports of PC strand from Brazil, India, Korea, Mexico, and Thailand were being sold at LTFV and subsidized by the Government of India.<sup>19</sup> The Commission determined on January 21, 2004 that the domestic industry was materially injured by reason of such imports of PC strand from Brazil, India, Korea, Mexico, and Thailand.<sup>20</sup> On January 28, 2004, Commerce issued its antidumping duty orders with the final weighted-average dumping margins ranging from 118.75 percent for Brazil, 83.65 to 102.07 percent for India, 35.64 to

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<sup>12</sup> 64 FR 4123, January 27, 1999.

<sup>13</sup> 64 FR 40554, July 27, 1999.

<sup>14</sup> 69 FR 21160, April 20, 2004.

<sup>15</sup> 69 FR 25563, May 7, 2004.

<sup>16</sup> 69 FR 33071, June 14, 2004.

<sup>17</sup> 69 FR 35584, June 25, 2004.

<sup>18</sup> Prestressed Concrete Steel Wire Strand from Brazil, India, Korea, Mexico, and Thailand, Inv. Nos. 701-TA-432 and 731-TA-1024-1028 (Final), USITC Publication 3663, January 2004 (“Original 2004 publication”), p. I-1.

<sup>19</sup> 68 FR 68348-68357, December 8, 2003.

<sup>20</sup> 69 FR 4177, January 28, 2004.

54.19 percent for Korea, 67.78 to 77.20 percent for Mexico, and 12.91 percent for Thailand.<sup>21</sup> On February 4, 2004, Commerce issued its countervailing duty order with the net subsidy rate of 62.92 percent for India.<sup>22</sup>

### **The first five-year reviews (Brazil, India, Japan, Korea, Thailand, and Mexico)**

On March 6, 2009, the Commission determined that it would conduct full reviews of the antidumping duty finding/orders on PC strand from Brazil, India, Japan, Korea, Mexico, and Thailand and the countervailing duty order on PC strand from India.<sup>23</sup> On March 26, 2009, Commerce determined that revocation of the antidumping duty finding/orders on PC strand from Brazil, India, Japan, Korea, Mexico, and Thailand would be likely to lead to continuation or recurrence of dumping.<sup>24</sup> On April 8, 2009, Commerce determined that the revocation of the countervailing duty order on PC strand from India would be likely to lead to continuation or recurrence of subsidization.<sup>25</sup> On November 25, 2009, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.<sup>26</sup> Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective December 11, 2009, Commerce issued a continuation of the antidumping duty finding/orders on imports of PC strand from Brazil, India, Japan, Korea, Mexico, and Thailand, and the countervailing duty order on imports of PC strand from India.<sup>27</sup>

### **The second five-year reviews (Brazil, India, Japan, Korea, Thailand, and Mexico)**

On February 6, 2015, the Commission determined that it would conduct expedited reviews of the antidumping duty orders on PC strand from Brazil, India, Korea, Mexico, and Thailand, and the antidumping finding on PC strand from Japan, as well as the countervailing duty order on PC strand from India.<sup>28</sup> On March 11, 2015, Commerce determined that the revocation of the countervailing duty order on PC strand from India would be likely to lead to

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<sup>21</sup> 69 FR 4109-4112, January 28, 2004. Commerce amended the final determination of the antidumping duty investigation of PC strand from Thailand to correct ministerial errors. The revised final weighted-average dumping margin for Thailand is 12.91 percent. 69 FR 4111, January 28, 2004.

<sup>22</sup> 69 FR 5319, February 4, 2009.

<sup>23</sup> 74 FR 11967, March 20, 2009.

<sup>24</sup> 74 FR 13189, March 26, 2009.

<sup>25</sup> 74 FR 15938, April 8, 2009.

<sup>26</sup> 74 FR 62820, December 1, 2009.

<sup>27</sup> 74 FR 65739, December 11, 2009.

<sup>28</sup> 80 FR 9747, February 24, 2015.

continuation of recurrence of subsidization.<sup>29</sup> On March 17, 2015, Commerce determined that revocation of the antidumping duty finding/orders on PC strand from Brazil, India, Japan, Korea, Mexico, and Thailand would be likely to lead to continuation or recurrence of dumping.<sup>30</sup> On April 10, 2015, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.<sup>31</sup> Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective April 23, 2015, Commerce issued a continuation of the antidumping duty finding/orders on imports of PC strand from Brazil, India, Japan, Korea, Mexico, and Thailand, and the countervailing duty order on imports of PC strand from India.<sup>32</sup>

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<sup>29</sup> 80 FR 12804, March 11, 2015.

<sup>30</sup> 80 FR 13827, March 17, 2015.

<sup>31</sup> 80 FR 20244, April 15, 2015.

<sup>32</sup> 80 FR 22708, April 23, 2015.

## Previous and related investigations

The Commission has conducted a number of previous import relief investigations on PC strand or similar merchandise. Table I-2 presents data on previous and related title VII investigations.

**Table I-2**  
**PC strand: Previous and related Commission proceedings**

Original investigation				Current Status
Date	Number(s)	Countr(ies)	Outcome	
1978	AA1921-182	India	Negative	NA
1982	701-TA-164	Spain	Negative	NA
1982	701-TA-152	Brazil	Negative	NA
1982	701-TA-153	France	Negative	NA
1982	731-TA-89	United Kingdom	Negative	NA
2009	701-TA-464 and 731-TA-1160	China	Affirmative	Orders continued after second reviews, October 13, 2015; Third reviews scheduled for institution on September 1, 2020
2020	701-TA-646 and 731-TA-1502- 1516	Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, Turkey, Ukraine, and United Arab Emirates	NA	Ongoing preliminary phase investigations

Note: "Date" refers to the year in which the investigation or review was instituted by the Commission.

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

## Commerce's five-year reviews

Commerce is conducting expedited reviews with respect to the finding/orders on imports of PC strand from Brazil, India, Japan, Korea, Mexico, and Thailand and intends to issue the final results of these reviews based on the facts available not later than June 30, 2020.<sup>33</sup> Commerce's Issues and Decision Memoranda, published concurrently with Commerce's final results, will contain complete and up-to-date information regarding the background and history of the finding/orders, including scope rulings, duty absorption, changed circumstances reviews, and anti-circumvention. Upon publication, a complete version of the Issues and Decision Memoranda can be accessed at <http://enforcement.trade.gov/frn/>. The Issues and Decision Memoranda will also include any decisions that may have been pending at the issuance of this report. Any foreign producers/exporters that are not currently subject to the antidumping duty finding/orders and countervailing duty order on imports of PC strand from Brazil, India, Japan, Korea, Mexico, and Thailand are noted in the sections titled "The original investigations" and "U.S. imports," if applicable.

## The product

### Commerce's scope (Brazil, India, Korea, Mexico, and Thailand)

In its 2015 continuation orders concerning the orders on PC strand from Brazil, India, Korea, Mexico, and Thailand, Commerce defined the scope as follows:

The product covered in the sunset reviews of the antidumping duty orders on PC strand from Brazil, India, Korea, Mexico, and Thailand and the countervailing duty order on PC strand from India is steel strand produced from wire of non-stainless, non-galvanized steel, which is suitable for use in prestressed concrete (both pre-tensioned and post-tensioned) applications. The product definition encompasses covered and uncovered strand and all types, grades, and diameters of PC strand.<sup>34</sup>

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<sup>33</sup> Letter from Alex Villanueva, Director, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, April 22, 2020.

<sup>34</sup> 80 FR 22708, April 23, 2015.

## **Commerce's scope (Japan)**

In its 2015 continuation order concerning the finding on PC strand from Japan, Commerce defined the scope as follows:

The product covered in the sunset review of the antidumping duty finding on PC strand from Japan is steel wire strand, other than alloy steel, not galvanized, which is stress-relieved and suitable for use in prestressed concrete.<sup>35</sup>

## **U.S. tariff treatment**

PC strand is currently imported under HTS statistical reporting numbers 7312.10.3010 and 7312.10.3012. These tariff classifications also contain products outside of the scope of these reviews, such as galvanized PC strand. PC strand imported from Brazil, India, Japan, Korea, Mexico, and Thailand enter the U.S. market at a column 1-general duty rate of "free." Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

## **Description and uses<sup>36</sup>**

PC strand consists of multiple steel wires wound together to produce a strong, flexible product that is used to strengthen concrete structures. PC strand is commonly available in three grades, in covered and uncovered form, and in several nominal diameters. The most common PC strand configuration consists of six wires wound helically around a single wire core. Nominal diameters of PC strand typically range from 0.25 to 0.70 inch and generally have three grade designations: 250, 270, and 300.

PC strand is used in the construction of prestressed concrete structural components to introduce compression into the concrete. This compression offsets or neutralizes forces within the concrete that occur when it is subjected to loads. Typical applications of prestressed concrete include bridge decks, bridge girders, pilings, precast concrete panels and structural supports, roof trusses, floor supports, and certain concrete foundations. One of the most widespread uses of prestressed concrete, however, is parking garages.

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<sup>35</sup> 80 FR 22708, April 23, 2015.

<sup>36</sup> Unless otherwise noted, this information is based on Prestressed Concrete Steel Wire Strand from Brazil, India, Japan, Korea, Mexico, and Thailand, Investigation Nos. 701- TA-432 and 731-TA-1024-8 (Second Review) and AA1921-188 (Fourth Review), USITC Publication 4527, April 2015 ("Second grouped review 2015 publication"), pp. I-4-I-6.

PC strand may be pre-tensioned or post-tensioned. Pre-tensioned PC strand is tensioned (pulled tightly and slightly elongated) using a calibrated tensioning apparatus, and concrete is cured around the PC strand. After the concrete has cured, the tension is released, and the tensile force of the strand induces a compressive force in the concrete. Pre-tensioned prestressed concrete depends upon the bond between the concrete and the PC strand to hold the concrete in compression. Most pre-tensioned concrete elements are prefabricated in a factory and must be transported to the construction site. Pre-tensioned concrete components may be used in balconies, lintels, floor slabs, beams, or foundation piles.

For post-tensioned PC strand, there is no bond between the PC strand and the cured concrete. Instead, the PC strand is tensioned using a calibrated tensioning apparatus after the concrete has cured. In post-tensioned prestressed concrete, tension is maintained by installing permanent mechanical anchors that remain in place after the tensioning apparatus is removed. Unlike pre-tensioning, which is largely performed at precast manufacturing facilities, post-tensioning takes place on the job site in cast-in-place applications. The concrete component is cast in a way that allows PC strand to be installed so that it is protected from bonding with the concrete. Post-tensioning gives designers the flexibility to further optimize material use by creating thinner concrete components. The predominant end uses of post-tensioned PC strand are in slab-on-grade construction and in buildings for floors with moderate-to-long spans and moderate floor loads such as in parking garages and residential buildings.

Depending on the application, PC strand will be either uncoated or coated (with plastic or epoxy). For pre-tensioning applications, where the bond between the cured concrete and the PC strand holds the concrete in compression, the PC strand is installed uncoated. In contrast, post-tensioning applications may require uncoated or coated PC strand. Plastic-coated PC strand is lubricated with grease and encased in a plastic tube, whereas epoxy-coated PC strand is coated with epoxy.

There are two methods of post-tensioning PC strand in concrete members: internal and external. For internal post-tensioning applications, the PC strand is either (1) greased and plastic-coated (which keeps the concrete from bonding to the PC strand during the curing process) and concrete is cured around the coated PC strand or (2) plastic or metal ducts are cast into the concrete and uncoated PC strand is passed through each duct. If the duct method is used, after tensioning and anchoring, the ducts containing the PC strand are filled with grout to protect it from corrosion. For external post-tensioning applications, coated PC strand or galvanized (zinc-coated) PC strand may be used to protect against corrosion. Whether it is used uncoated or coated, PC strand of various suppliers is interchangeable within each physical size, physical configuration, and grade.



## **Manufacturing process<sup>37</sup>**

PC strand is typically produced from hot-rolled, high-carbon steel wire rod. The production process consists of four distinct steps: drawing, stranding, stabilizing, and packaging. The drawing step begins with cleaning and descaling to remove dirt and mill scale from the hot-rolled, high-carbon steel wire rod before feeding it through the wire drawing dies. Cleaning and descaling can be accomplished chemically, using a strong acid, or mechanically, using abrasive methods. The cleaned and descaled wire rod is then coated with zinc phosphate and pulled through a series of wire drawing dies to reduce its size. Depending on the finished size required, the rod may be drawn through up to nine dies. If indented wire is specified, the wire is indented, using carbide rollers, after the final size reduction.

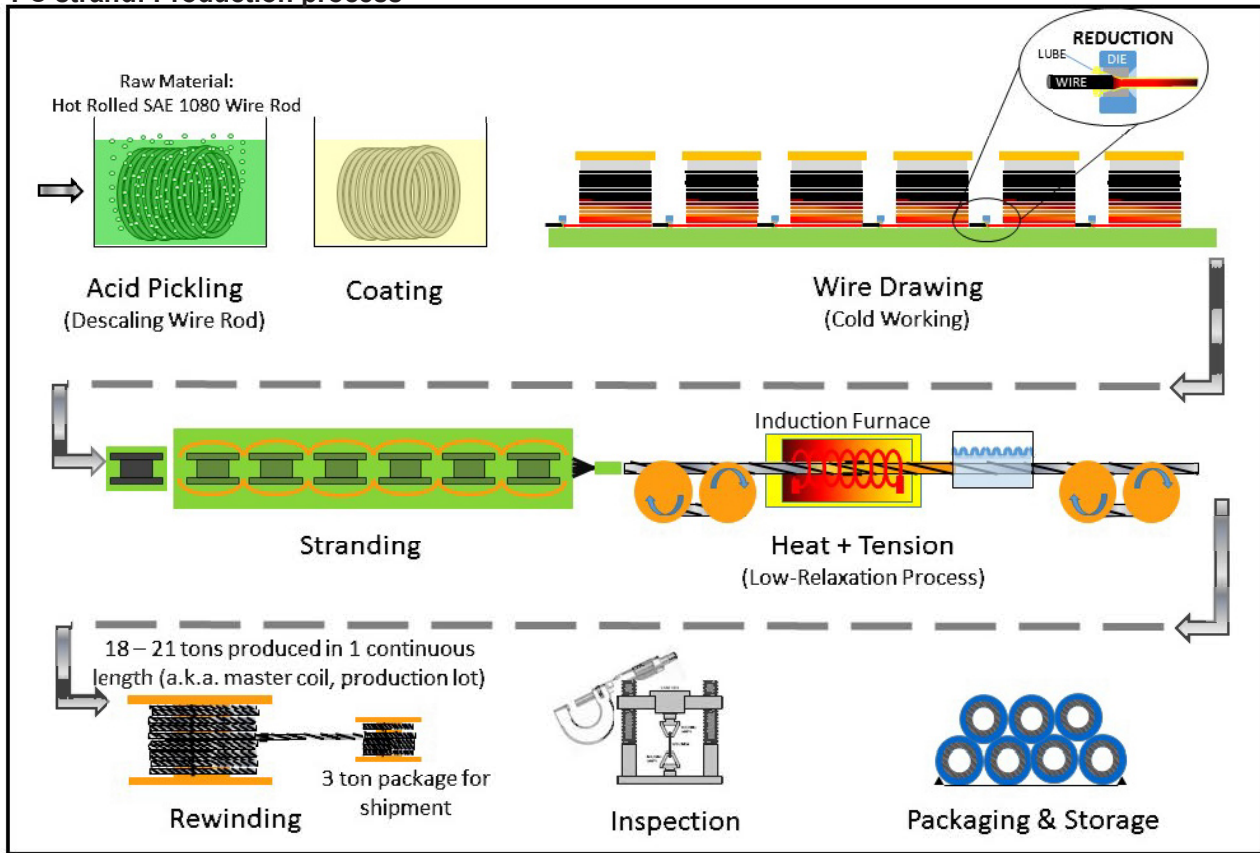
After drawing, the wire undergoes stranding. During the stranding process, wires are wound into a strand, helically and uniformly, by a stranding machine. The PC strand is then stabilized by removing residual mechanical stresses through thermal and possibly mechanical treatments. The extent of the stress relief determines the type of PC strand. Low-relaxation PC strand is subjected to simultaneous thermal and mechanical treatment after stranding, while “normal”-relaxation PC strand (commonly referred to as stressed-relieved PC strand) requires only thermal treatment. Finally, if coating is required, the PC strand is either lubricated with grease and encased in a plastic tube or coated with epoxy.

The finished product is wound onto a drum, strapped into place with steel bands, and packaged as a coil. The coil may be covered with a protective material, such as plastic or burlap and is packaged such that the end user can place the coil directly onto a strand dispenser.

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<sup>37</sup> Second grouped review 2015 publication, p. I-6.

**Figure I-1**  
**PC strand: Production process**



Source: Sumiden Wire Products Corporation, "PC Strand," <http://www.sumidenwire.com/products/pc-strand/>, retrieved March 13, 2020.

## The industry in the United States

### U.S. producers

During the final phase of the original Japan investigation, the Commission received U.S. producer questionnaires from five firms: American Spring Wire Corp., Armco Steel Corp., Bethlehem Steel Corp., CF&I Steel Corp., and Florida Wire & Cable Co. These firms accounted for essentially all production of PC strand in the United States during 1977.<sup>38</sup>

<sup>38</sup> During the original Japan investigation, a sixth U.S. producer, Washburn Wire Products Co. ("Washburn"), was identified. A sixth U.S. producer, Washburn Wire Products Co., was ultimately excluded from the data presented because it did not begin production of PC strand until June 1978. Original Japan 1978 publication, p. A-8.

During the expedited first Japan five-year review, four U.S. producers of PC strand, which accounted for all production of PC strand in the United States during 1997, provided a response to the Commission's notice of institution.<sup>39</sup>

During the expedited second Japan five-year review, domestic interested parties provided a list of five known U.S. producers of PC strand during 2003.<sup>40</sup> Three domestic producers that submitted a response to the Commission's notice of institution in that review, American Spring Wire Corp. ("American"), Insteel, and Sumiden, accounted for approximately \*\*\* percent of estimated U.S. production of PC strand in 2003.<sup>41</sup>

During the final phase of the original investigations concerning Brazil, India, Korea, Mexico, and Thailand, the Commission received U.S. producer questionnaires from five firms, which accounted for all production of PC strand in the United States between January 2000 and June 2003.<sup>42</sup>

During the full first grouped five-year reviews concerning Brazil, India, Japan, Korea, Mexico, and Thailand, the Commission received U.S. producer questionnaires from five firms, which accounted for all production of PC strand in the United States during 2008.<sup>43</sup>

During the expedited second grouped five-year reviews concerning Brazil, India, Japan, Korea, Mexico, and Thailand, domestic interested parties provided a list of six known U.S. producers of PC strand during 2013.<sup>44</sup> The domestic interested parties' response to the Commission's notice of institution in those reviews included requested U.S. industry data for

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<sup>39</sup> Prestressed Concrete Steel Wire Strand from Japan, Inv. No. AA1921-188 (Review), USITC Publication 3156, February 1999 ("First Japan review 1999 publication"), pp. 3 and I-5-I-6.

<sup>40</sup> Prestressed Concrete Steel Wire Strand from Japan, Inv. No. AA1921-188 (Second Review), USITC Publication 3699, June 2004 ("Second Japan review 2004 publication"), p. I-7.

<sup>41</sup> Investigation No. AA1921-188 (Second Review): Prestressed Concrete Steel Wire Strand from Japan, Confidential Report, INV-BB-058, May 10, 2004 ("Second Japan review 2004 confidential report"), p. I-8.

<sup>42</sup> Original 2004 publication, p. III-1.

<sup>43</sup> Investigation Nos. 701-TA-432 and 731-TA-1024-1028 (Review) and AA1921-188 (Third Review): Prestressed Concrete Steel Wire Strand from Brazil, India, Japan, Korea, Mexico, and Thailand, Confidential Report, INV-GG-100, October 26, 2009 ("First grouped review 2009 confidential report"), pp. I-35-I-37.

<sup>44</sup> Investigation Nos. 701-TA-432 and 731-TA-1024-1028 (Second Review) and AA1921-188 (Fourth Review): Prestressed Concrete Steel Wire Strand from Brazil, India, Japan, Korea, Mexico, and Thailand, Confidential Report, INV-NN-002, January 27, 2015 ("Second grouped review 2015 confidential report"), p. 23.

three domestic producers (American, Insteel, and Sumiden) that accounted for approximately \*\*\* percent of estimated U.S. production of PC strand in 2013.<sup>45</sup>

In response to the Commission's notice of institution in these current reviews, domestic interested parties provided a list of four known and currently operating U.S. producers of PC strand.<sup>46</sup> The three firms on whose behalf the domestic interested party response to the Commission's notice of institution was filed (i.e., Insteel (including acquired Strand-Tech), Sumiden, and WMC) accounted for approximately \*\*\* percent of production of PC strand in the United States during 2019.<sup>47</sup>

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<sup>45</sup> Second grouped review 2015 confidential report, p. 6, tables 1 and 3.

<sup>46</sup> Domestic interested parties' response to the notice of institution, March 30, 2020, p. 20.

<sup>47</sup> Ibid., pp. 20-22 and exh. 12.

## Recent developments

Since the Commission’s last five-year reviews, the following developments have occurred in the PC strand industry. Table I-3 presents events in the U.S. industry since the last five-year reviews.

**Table I-3**  
**PC strand: Recent developments in the U.S. industry**

Item	Firm	Event
Plant opening	Sumiden	On August 9, 2017, Sumiden began production operations at its greenfield PC strand plant in Dayton, Texas.
Plant opening	Liberty	On June 25, 2018, Liberty restarted wire rod production operations at its Georgetown, South Carolina plant, which had been idled for the previous three years.
Expansion	WMC	On November 6, 2017, WMC announced plans to install a new pickling line and eight drawing machines for PC strand at its plant in St. Matthews, South Carolina.
Expansion	WMC	On March 20, 2018, WMC announced plans to add a new PC strand line to its plant in Conroe, Texas.
Closure	Insteel	On February 15, 2015, Insteel announced it would close operations at its plant in Newnan, Georgia. Production operations would be shifted to other plants in Tennessee, Texas, and Florida.
Acquisition	Keystone	On August 5, 2015, Keystone acquired PC strand producer Strand-Tech, which is based in Summersville, South Carolina.
Acquisition	WMC	On April 2, 2018, WMC announced its acquisition of two wire facilities from Gerdau Long Steel North America. The plants WMC acquired were in Carrollton, Texas, and Beaumont, Texas.
Acquisition	Insteel	On March 17, 2020, Insteel announced its acquisition of Strand-Tech.

Sources:

*Sumiden plant opening*, <https://www.amm.com/Article/3740222/Sumiden-fires-up-Texas-PC-strand-plant.html>, retrieved April 10, 2020.

*Liberty plant opening*, <http://www.libertyhousegroup.com/news/restart-of-south-carolina-steel-mill-liberty-steel-georgetown/>, retrieved April 21, 2020.

*WMC plant upgrade*, <https://www.amm.com/Article/3764792/WMC-plans-S-Carolina-plant-upgrade.html>, retrieved April 10, 2020.

*WMC expansion*, <https://www.amm.com/Article/3795127/WMC-to-add-PC-strand-line-in-Houston.html>, retrieved April 10, 2020.

*Insteel closure*, <https://www.amm.com/Article/3426324/Insteel-to-close-PC-strand-facility-in-Ga.html>, retrieved April 10, 2020.

*Keystone acquisition*, <https://www.amm.com/Article/3576480/Keystone-acquires-Strand-Tech-in-PC-strand-play.html>, retrieved April 10, 2020.

*WMC acquisition*, <https://www.amm.com/Article/3797990/WMC-obtains-two-wire-facilities-from-Gerdau.html>, retrieved April 10, 2020

*Insteel webpage*, <https://insteelgcs.gcs-web.com/news-releases/news-release-details/insteel-industries-acquires-assets-strand-tech-manufacturing>, retrieved April 21, 2020.

## **U.S. producers' trade and financial data**

The Commission asked domestic interested parties to provide trade and financial data in their response to the notice of institution in the current five-year reviews.<sup>48</sup> Table I-4 presents a compilation of the data submitted from all responding U.S. producers as well as trade and financial data submitted by U.S. producers in the original investigations and prior five-year reviews.

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<sup>48</sup> Individual company trade and financial data are presented in app. B.

**Table I-4**  
**PC strand: Trade and financial data submitted by U.S. producers, 1977, 1997, 2002, 2008, 2013, and 2019**

Item	1977	1997	2002	2008	2013	2019
Capacity (1,000 pounds)	180,800	533,715	763,577	903,795	***	***
Production (1,000 pounds)	92,020	482,666	539,601	558,885	***	***
Capacity utilization (percent)	50.9	90.4	70.7	61.8	***	***
U.S. shipments: Quantity (1,000 pounds)	90,737	454,460	521,323	529,972	***	***
Value (\$1,000)	NA	150,311	126,778	333,721	***	***
Unit value (per 1,000 pounds)	NA	\$331	\$243	\$630	\$***	\$***
Net sales (\$1,000)	24,848	155,705	132,712	354,082	***	***
COGS (\$1,000)	24,261	128,952	125,756	302,334	***	***
COGS/net sales (percent)	97.6	82.8	94.8	85.4	***	***
Gross profit (loss) (\$1,000)	587	26,753	6,956	51,748	***	***
SG&A expenses (\$1,000)	2,314	9,302	12,805	13,795	***	***
Operating income (loss) (\$1,000)	(1,727)	17,451	(5,849)	37,953	***	***
Operating income (loss)/net sales (percent)	(7.0)	11.2	(4.4)	10.7	***	***

Note: Certain data from past reports are not available (“NA”) and are not presented in this presentation.

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

Source: For the year 1977, data are compiled using data submitted in the Commission’s original Japan investigation. For the year 1997, data are compiled using data submitted in the Commission’s first Japan five-year review. For the year 2002, data are compiled using data submitted in the Commission’s second Japan five-year review and original investigations concerning Brazil, India, Korea, Mexico, and Thailand. For the year 2008, data are compiled using data submitted in the Commission’s first grouped five-year reviews. For the year 2013, data are compiled using data submitted in the Commission’s second grouped five-year reviews. For the year 2019, data are compiled using data submitted by domestic interested parties. Domestic interested parties’ response to the notice of institution, March 30, 2020, exh. 12.

## **Definitions of the domestic like product and domestic industry**

The domestic like product is defined as the domestically produced product or products which are like, or in the absence of like, most similar in characteristics and uses with, the subject merchandise. The domestic industry is defined as the U.S. producers as a whole of the domestic like product, or those producers whose collective output of the domestic like product constitutes a major proportion of the total domestic production of the product. Under the

related parties provision, the Commission may exclude a U.S. producer from the domestic industry for purposes of its injury determination if “appropriate circumstances” exist.<sup>49</sup>

In its expedited first and second five-year reviews of the antidumping finding concerning Japan, the Commission found that the appropriate definition of the domestic like product was the same as Commerce’s scope: all steel wire strand, other than alloy steel, not galvanized, which has been stress-relieved and is suitable for use in prestressed concrete. The Commission did not explicitly make a like product determination in its original determination concerning Japan. In its original determinations concerning Brazil, India, Korea, Mexico, and Thailand, the Commission found the domestic like product to be all PC strand co-extensive with Commerce’s scope, that is, steel strand produced from wire of non-stainless, non-galvanized steel that is suitable for use in prestressed concrete (both pre-tensioned and post-tensioned) applications and that encompasses covered and uncovered strand and all types, grades, and diameters of prestressed concrete steel wire strand. In its grouped full 2009 review determinations and its grouped expedited 2015 review determinations, the Commission defined the domestic like product consistent with its prior determinations, that is, steel strand produced from wire of non-stainless, non-galvanized steel that is suitable for use in prestressed concrete (both pre-tensioned and post-tensioned) applications and that encompasses covered and uncovered strand and all types, grades, and diameters of prestressed concrete steel wire strand. The Commission recognized that the description of the scope of the finding concerning Japan and the scope of the orders concerning Brazil, India, Korea, Mexico, and Thailand differed in a number of technical respects but found that those differences lacked significance.

In its original determination and its expedited first and second reviews of the antidumping finding concerning Japan, the Commission defined the domestic industry as all producers of PC strand. Likewise, in its original determinations concerning Brazil, India, Korea, Mexico, and Thailand, the Commission found the domestic industry to be all producers of PC strand. The Commission also determined that plastic coating did not constitute sufficient production-related activity to qualify coaters as members of the domestic industry producing PC strand. In its grouped full 2009 review determinations and its grouped expedited 2015 review determinations, the Commission defined the domestic industry to include all producers of the domestic like product.<sup>50</sup>

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<sup>49</sup> Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).

<sup>50</sup> 85 FR 12332, March 2, 2020.



## U.S. imports and apparent U.S. consumption

### U.S. importers

During the period examined in the final phase of the original Japan investigation, PC strand was imported into the United States principally by 8 large importing companies, although several smaller companies made occasional purchases from Japan.<sup>51</sup> Imports of PC strand from Japan accounted for 88.3 percent of all U.S. imports during 1977.<sup>52</sup>

Although the Commission did not receive responses from any respondent interested parties in the first Japan five-year review, the domestic interested parties provided a list of three firms that may have imported PC strand from Japan at that time.<sup>53</sup>

Although the Commission did not receive responses from any respondent interested parties in its second Japan five-year review, the domestic interested parties provided a list of five firms that may have imported PC strand from Japan at that time.<sup>54</sup>

During the final phase of the original investigations concerning Brazil, India, Korea, Mexico, and Thailand, the Commission received U.S. importer questionnaires from 12 firms, which accounted for the following shares of total U.S. imports of PC strand during 2002: \*\*\* percent of total imports from Brazil, \*\*\* percent of total imports from India, \*\*\* percent of total imports from Korea, \*\*\* percent of total imports from Mexico, and \*\*\* percent of total imports from Mexico.<sup>55</sup>

During the first grouped five-year reviews concerning Brazil, India, Japan, Korea, Mexico, and Thailand, the Commission received U.S. importer questionnaires from 22 firms, which accounted for the following shares of total U.S. imports of PC strand during the period of 2003 to 2008: \*\*\* percent of total imports from Brazil, \*\*\* percent of total imports from India, \*\*\* percent of total imports from Japan, \*\*\* percent of total imports from Korea, and \*\*\* percent of total imports from Thailand.<sup>56</sup>

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<sup>51</sup> Original Japan 1978 publication, p. A-9.

<sup>52</sup> Ibid., p. A-13.

<sup>53</sup> First Japan review 1999 publication, p. I-7.

<sup>54</sup> Second Japan review 2004 publication, p. I-11.

<sup>55</sup> Investigation Nos. 701-TA-432 and 731-TA-1024-1028 (Final): Prestressed Concrete Steel Wire Strand from Brazil, India, Korea, Mexico, and Thailand, Confidential Report, INV-AA-191, December 19, 2003, as revised in INV-BB-006, January 7, 2004 (“Original 2004 confidential report”), p. IV-1.

<sup>56</sup> The PC strand producers in Mexico reported that they had not exported the subject merchandise to the United States since \*\*\*. None of the responding firms reported imports of subject merchandise from Mexico during 2003-08. First grouped review 2008 confidential report, pp. I-39 and IV-1.

Although the Commission did not receive responses from any respondent interested parties in its second grouped five-year reviews concerning Brazil, India, Japan, Korea, and Mexico, the domestic interested parties provided a list of 68 firms that may have imported PC strand from Brazil, India, Japan, Korea, Mexico, and/or Thailand at that time.<sup>57</sup>

Although the Commission did not receive responses from any respondent interested parties in these current reviews, in its response to the Commission's notice of institution, the domestic interested parties provided a list of 79 potential U.S. importers of PC strand.<sup>58</sup> With the exception of the original investigations concerning Brazil, India, Korea, Mexico, and Thailand, the import data presented in the current and prior proceedings are based on official Commerce statistics. Import data presented in the original investigations concerning Brazil, India, Korea, Mexico, and Thailand are based on questionnaire responses for the subject countries and official Commerce statistics for all other countries.

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<sup>57</sup> Second grouped review 2015 publication, p. I-17.

<sup>58</sup> Domestic interested parties' response to the notice of institution, March 30, 2020, exh. 9.

## U.S. imports

Table I-5 presents the quantity, value, and unit value of U.S. imports from Brazil, India, Japan, Korea, Mexico, and Thailand as well as the other top sources of U.S. imports.

**Table I-5**  
**PC strand: U.S. imports, 2014-19**

Item	2014	2015	2016	2017	2018	2019
<b>Quantity (1,000 pounds)</b>						
Brazil	—	0	—	—	—	—
India	—	34	—	—	—	—
Korea	2,082	1,762	653	355	744	554
Mexico	1,785	—	—	—	3	—
Thailand	—	88	—	—	7,842	2,082
Subtotal, 5 subject	3,867	1,884	653	355	8,588	2,636
Japan	867	989	1	—	657	651
Subtotal, 6 subject	4,734	2,873	654	355	9,245	3,287
All other sources (nonsubject)	265,608	279,505	265,662	280,441	276,291	310,079
Total imports	270,341	282,377	266,316	280,796	285,536	313,366
<b>Landed, duty-paid value (\$1,000)</b>						
Brazil	—	4	—	—	—	—
India	—	21	—	—	—	—
Korea	1,388	1,242	379	231	486	342
Mexico	986	—	—	—	5	—
Thailand	—	33	—	—	3,750	872
Subtotal, 5 subject	2,374	1,299	379	231	4,241	1,214
Japan	835	843	6	—	485	541
Subtotal, 6 subject	3,209	2,143	385	231	4,726	1,755
All other sources (nonsubject)	124,997	124,699	90,198	98,262	124,868	127,192
Total imports	128,206	126,842	90,583	98,492	129,594	128,947
<b>Unit value (dollars per 1,000 pounds)</b>						
Brazil	—	1,676,479	—	—	—	—
India	—	608	—	—	—	—
Korea	667	705	580	650	654	617
Mexico	553	—	—	—	1749	—
Thailand	—	372	—	—	478	419
Subtotal, 5 subject	614	690	580	650	494	461
Japan	963	853	4351	—	738	831
Subtotal, 6 subject	678	746	588	650	511	534
All other sources (nonsubject)	471	446	340	350	452	410
Total imports	474	449	340	351	454	411

Footnotes continued on next page.

Note: During the first grouped five-year reviews concerning Brazil, India, Japan, Korea, Mexico, and Thailand, Aceros Camesa S.A. de C.V. and Deacero S.A. de C.V., the only PC strand producers in Mexico, reported that they had not exported subject merchandise to the United States since \*\*\*. Therefore, U.S. imports of PC strand from Mexico may consist of out-of-scope merchandise.

Note: Sumitomo, a Japanese producer of PC strand, is excluded from the antidumping duty finding on PC strand from Japan. \*\*\*. However, in its follow-up response to the notice of institution, the domestic interested parties indicated that Sumitomo did not export its excluded PC strand to the United States during 2014-19. Domestic interested parties' supplemental response to the notice of institution, April 9, 2020, p. 1.

Note: During the first grouped five-year reviews concerning Brazil, India, Japan, Korea, Mexico, and Thailand, \*\*\* reported only out-of-scope galvanized strand imports from Japan entering the United States under the applicable HTS statistical reporting numbers. During these current reviews, \*\*\* accounted for \*\*\* of U.S. imports from Japan.

Note: The subject import data as calculated from official Commerce statistics are overstated by the entry of out-of-scope merchandise (e.g., galvanized strand) under the applicable HTS statistical reporting numbers for the subject PC strand. Although in aggregate the degree of overstatement is relatively minor, for certain smaller sources, galvanized PC strand can account for a substantial share of U.S. imports.

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

Note: Figures shown as "0" represent values greater than zero, but less than 500.

Source: Compiled from official Commerce statistics for HTS statistical reporting numbers 7312.10.3010 and 7312.10.3012.

## Apparent U.S. consumption and market shares

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

**Table I-6**

**PC strand: U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares, 1977, 1997, 2002, 2008, 2013, and 2019**

Item	1977	1997	2002	2008	2013	2019
<b>Quantity (1,000 pounds)</b>						
U.S. producers' U.S. shipments	90,737	454,460	521,323	529,972	***	***
U.S. imports from—						
Brazil	NA	NA	23,078	0	—	—
India	NA	NA	14,436	209	—	—
Korea	NA	NA	63,739	3,325	2,344	554
Mexico	NA	NA	52,964	1,514	646	—
Thailand	NA	NA	10,661	0	—	2,082
Subtotal, 5 subject	NA	NA	164,878	5,048	2,990	2,636
Japan	176,452	597	494	1,380	1,201	651
Subtotal, 6 subject	NA	NA	165,372	6,429	4,191	3,287
All other sources	23,311	133,096	61,487	406,312	212,851	310,079
Total imports	199,763	133,693	226,859	412,741	217,042	313,366
Apparent U.S. consumption	290,500	588,153	748,182	942,713	***	***
<b>Value (1,000 dollars)</b>						
U.S. producers' U.S. shipments	NA	150,311	126,778	333,721	***	***
U.S. imports from—						
Brazil	NA	NA	5,219	0	—	—
India	NA	NA	3,096	156	—	—
Korea	NA	NA	14,062	2,201	1,503	342
Mexico	NA	NA	14,506	885	448	—
Thailand	NA	NA	2,626	0	—	872
Subtotal, 5 subject	NA	NA	39,509	3,241	1,951	1,214
Japan	34,372	362	262	916	1,029	541
Subtotal, 6 subject	NA	NA	39,771	4,157	2,980	1,755
All other sources	4,474	37,311	14,846	211,890	102,003	127,192
Total imports	38,846	37,673	54,617	216,047	104,983	128,947
Apparent U.S. consumption	NA	187,984	181,395	549,768	***	***

Table continued on next page.

**Table I-6—Continued**

**PC strand: U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares, 1977, 1997, 2002, 2008, 2013, and 2019**

Item	1977	1997	2002	2008	2013	2019
<b>Share of consumption based on quantity (percent)</b>						
U.S. producer's share	31.2	77.3	69.7	56.2	***	***
U.S. imports from—						
Brazil	NA	NA	3.1	0.0	***	***
India	NA	NA	1.9	0.0	***	***
Korea	NA	NA	8.5	0.4	***	***
Mexico	NA	NA	7.1	0.2	***	***
Thailand	NA	NA	1.4	0.0	***	***
Subtotal, 5 subject	NA	NA	22.0	0.5	***	***
Japan	60.7	0.1	0.1	0.1	***	***
Subtotal, 6 subject	NA	NA	22.1	0.7	***	***
All other sources	8.0	22.6	8.2	43.1	***	***
Total imports	68.8	22.7	30.3	43.8	***	***
<b>Share of consumption based on value (percent)</b>						
U.S. producer's share	NA	80.0	69.9	60.7	***	***
U.S. imports from—						
Brazil	NA	NA	2.9	0.0	***	***
India	NA	NA	1.7	0.0	***	***
Korea	NA	NA	7.8	0.4	***	***
Mexico	NA	NA	8.0	0.2	***	***
Thailand	NA	NA	1.4	0.0	***	***
Subtotal, 5 subject	NA	NA	21.8	0.6	***	***
Japan	NA	0.2	0.1	0.2	***	***
Subtotal, 6 subject	NA	NA	21.9	0.8	***	***
All other sources	NA	19.8	8.2	38.5	***	***
Total imports	NA	20.0	30.1	39.3	***	***

Note: Certain data from past reports are not available ("NA") and are not presented in this presentation. Data for Brazil, India, Korea, Mexico, and Thailand for 1977 and 1997 are included in "all other sources."

Note: For the year 2002, apparent U.S. consumption is derived from U.S. shipments of imports for Brazil, India, Korea, Mexico, and Thailand, rather than U.S. imports.

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

Source: For the years 1977 and 1997, data are compiled using data presented in the Commission's original Japan report and first Japan five-year review report, respectively. For the year 2002, data are compiled using data presented in the Commission's second Japan five-year review report and the original Brazil, India, Korea, Mexico, and Thailand report. For the years 2008 and 2013, data are compiled using data presented in the Commission's first and second grouped five-year review reports, respectively. For the year 2019, U.S. producers' U.S. shipments are compiled from the domestic interested parties' response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics under HTS statistical reporting numbers 7312.10.3010 and 7312.10.3012.

## Cumulation considerations<sup>59</sup>

In assessing whether imports should be cumulated in five-year reviews, the Commission considers, among other things, whether there is a likelihood of a reasonable overlap of competition among subject imports and the domestic like product. Additional information concerning geographical markets and simultaneous presence in the market is presented below.<sup>60</sup> Table I-7 presents data on the monthly entries of U.S. imports of PC strand, by source, during 2014-19.

**Table I-7**  
**PC strand: U.S. imports, monthly entries into the United States, by sources, 2014-19**

Country	2014	2015	2016	2017	2018	2019
<b>Number of months with subject imports (Count)</b>						
Brazil	0	1	0	0	0	0
India	0	1	0	0	0	0
Japan	4	4	1	0	5	3
Korea	9	9	6	4	5	6
Mexico	7	0	0	0	1	0
Thailand	0	2	0	0	8	8

Source: Compiled from official Commerce statistics for HTS statistical reporting numbers 7312.10.3010 and 7312.10.3012.

U.S. imports of PC strand from Korea were present in each year between 2014 and 2019. However, the presence of subject imports in the market for the remaining subject countries appeared more sporadic, with no monthly entries of imports of PC strand for the following: Brazil (2014 and 2016-19), India (2014 and 2016-19), Mexico (2015-17 and 2019), and Thailand (2014 and 2016-17). Of the 72 months between 2014 and 2019, imports of PC strand were reported for the following: Brazil (one month), India (one month), Japan (17 months), Korea (39 months), Mexico (eight months), and Thailand (18 months).

Imports from Brazil and India were only reported in 2015 during 2014-19. These U.S. imports entered through the eastern border of the United States from Brazil and the western border of the United States from India. Imports from Mexico were only reported in 2014 and 2018 during 2014-19. These U.S. imports from Mexico entered through the southern, eastern,

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<sup>59</sup> Unless otherwise noted, this information is based on official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010 and 7312.10.3012.

<sup>60</sup> In addition, available information concerning subject country producers and the global market is presented in the next section of this report.

and western borders of the United States in 2014 and the northern border of the United States in 2018. Imports from Japan were reported in all years except for 2017 during 2014-19. These U.S. imports from Japan entered through the southern, eastern, and western borders of entry during 2014-15, the northern border of entry in 2016, and the western border of entry during 2018-19. All imports from Korea entered through the southern and western borders of entry in all years from 2014 through 2019, with the exception of 2014-15 where U.S. imports also entered through the eastern border of entry.<sup>61</sup>

## The industry in Brazil

During the final phase of the original investigations concerning Brazil, India, Korea, Mexico, and Thailand, the Commission received a foreign producer/exporter questionnaire from one firm, which accounted for all production of PC strand in Brazil during 2000 to 2002, and approximately \*\*\* percent of PC strand exports from Brazil to the United States during 2000 to 2002.<sup>62</sup> During the first grouped five-year reviews concerning Brazil, India, Japan, Korea, Mexico, and Thailand, the Commission received a foreign producer/exporter questionnaire from one firm, which accounted for all production of PC strand in Brazil during 2008.<sup>63</sup> Although the Commission did not receive responses from any respondent interested parties in its second grouped five-year reviews concerning Brazil, India, Japan, Korea, Mexico, and Thailand, the domestic interested parties identified one possible producer of PC strand in Brazil in that proceeding.<sup>64</sup> Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested party similarly identified only one possible producer of PC strand in Brazil.<sup>65</sup> On July 7, 2017, Brazilian

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<sup>61</sup> The “northern” border of entry includes the following Customs entry districts: Chicago, Illinois and Great Falls, Montana. The “southern” border of entry includes the following Customs entry districts: Dallas-Fort Worth, Texas; Houston-Galveston, Texas; Laredo, Texas; Miami, Florida; and New Orleans, Louisiana. The “western” border of entry includes the following Customs entry districts: Los Angeles, California and San Francisco, California. The “eastern” border of entry includes the following Customs entry districts: Baltimore, Maryland; Charleston, South Carolina; New York, New York; Norfolk, Virginia; and Savannah, Georgia.

<sup>62</sup> Original 2004 confidential report, p. VII-1.

<sup>63</sup> First grouped review 2009 publication, p. IV-17.

<sup>64</sup> Second grouped review 2015 publication, p. I-24.

<sup>65</sup> Domestic interested parties’ response to the notice of institution, March 30, 2020, exh. 10.



authorities implemented duty order on PC strand from China.<sup>66</sup> Table I-8 presents the largest export markets for PC strand from Brazil during 2014-19.

**Table I-8**  
**PC strand: Exports from Brazil, 2014-19**

Destination market	Calendar year					
	2014	2015	2016	2017	2018	2019
<b>Quantity (1,000 pounds)</b>						
Colombia	3,938	3,016	2,795	4,646	8,540	12,903
Argentina	9,864	13,529	13,057	13,806	9,323	9,332
Chile	409	513	7,103	6,479	5,430	8,299
Israel	—	—	3,820	6,396	7,811	8,082
Bolivia	2,403	2,615	1,492	1,092	2,468	4,293
Costa Rica	1,760	2,788	8,075	4,428	5,588	2,669
United Arab Emirates	2,233	2,721	5,170	2,801	290	2,666
Oman	—	—	647	1,475	2,955	2,427
Mexico	138	2,200	6,492	2,544	1,736	2,386
Dominican Republic	767	1,363	1,088	793	2,506	2,336
All other destination markets	19,066	16,052	25,563	28,710	21,267	17,239
Total exports	40,578	44,796	75,300	73,170	67,913	72,633

Source: Official exports statistics under HS subheading 7312.10 as reported Global Trade Atlas database, accessed May 15, 2020.

## The industry in India

During the final phase of the original investigations concerning Brazil, India, Korea, Mexico, and Thailand, the Commission received a foreign producer/exporter questionnaire from one firm, which accounted for approximately \*\*\* percent of production of PC strand in India during 2002, and approximately \*\*\* percent of PC strand exports from India to the United States during January 2000 to June 2003.<sup>67</sup> During the first grouped five-year reviews concerning Brazil, India, Japan, Korea, Mexico, and Thailand, the Commission received a foreign producer/exporter questionnaire from one firm, which accounted for approximately \*\*\* percent of production of PC strand in India during 2008, and \*\*\* percent of PC strand exports from India to the United States during 2003 to 2008.<sup>68</sup> Although the Commission did not receive

<sup>66</sup> World Trade Organization, Semi-Annual Report under Article 16.4 of the Agreement Brazil, [https://www.wto.org/english/tratop\\_e/adp\\_e/adp\\_e.htm](https://www.wto.org/english/tratop_e/adp_e/adp_e.htm), retrieved May 22, 2020.

<sup>67</sup> Original 2004 confidential report, pp. VII-3, VII-5.

<sup>68</sup> First grouped review 2009 confidential report, pp. IV-32, IV-37.

responses from any respondent interested parties in its second grouped five-year reviews concerning Brazil, India, Japan, Korea, Mexico, and Thailand or these current five-year reviews, the domestic interested parties provided a list of four possible producers of PC strand in India in both proceedings.<sup>69</sup> Table I-9 presents the largest export markets for PC strand from India during 2014-19.

**Table I-9**  
**PC strand: Exports from India, 2014-19**

Destination market	Calendar year					
	2014	2015	2016	2017	2018	2019
<b>Quantity (1,000 pounds)</b>						
United Arab Emirates	37,930	27,997	24,102	38,314	49,958	40,965
Netherlands	3,719	3,530	1,533	6,287	8,640	12,990
Nepal	6,085	2,044	67,728	5,632	13,615	12,793
United Kingdom	12,489	5,583	3,867	6,665	7,161	11,403
Germany	795	297	215	3,275	11,588	8,291
Singapore	10,281	3,491	2,039	5,308	5,338	7,746
United States	12,321	8,511	3,138	4,317	6,708	7,655
Qatar	10,903	2,941	2,346	3,133	4,189	4,352
Ghana	1,013	35	254	240	212	3,713
Sri Lanka	2,686	2,892	2,434	2,197	2,611	3,387
All other destination markets	70,951	56,470	40,252	59,477	58,455	51,485
Total exports	169,174	113,791	147,908	134,844	168,477	164,780

Source: Official exports statistics under HS subheading 7312.10 as reported Global Trade Atlas database, accessed May 15, 2020.

## The industry in Japan

During the final phase of the original Japan investigation, the Commission compiled data from the Japanese Wire Products Exporters' Association and the Japan Tariff Association. Five Japanese companies were identified by Treasury in the original investigation as having produced PC strand for export to the United States: Kawatetsu Wire Products Co., Ltd. ("Kawatetsu"); Sumitomo; Shinko Wire Co., Ltd. ("Shinko"); Suzuki Metal Co., Ltd. ("Suzuki"); and Tokyo Rope Mfg. Co., Ltd. ("Tokyo Rope").<sup>70</sup> Although the Commission did not receive responses from any respondent interested parties in its first or second Japan five-year reviews,

<sup>69</sup> Second grouped review 2015 publication, p. I-25; Domestic interested parties' response to the notice of institution, March 30, 2020, exh. 10.

<sup>70</sup> Original Japan 1978 publication, p. A-9.

the domestic interested parties provided a list of five possible producers of PC strand in Japan in each of those proceedings.<sup>71</sup> During the first grouped five-year reviews concerning Brazil, India, Japan, Korea, Mexico, and Thailand, the Commission received foreign producer/exporter questionnaires from two firms, which were believed to have the \*\*\* capacity and production volumes of PC strand in Japan during those reviews.<sup>72</sup> Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of four possible producers/exporters of PC strand in Japan.<sup>73</sup> Table I-10 presents the largest export markets for PC strand from Japan during 2014-19.

**Table I-10**  
**PC strand: Exports from Japan, 2014-19**

Destination market	Calendar year					
	2014	2015	2016	2017	2018	2019
<b>Quantity (1,000 pounds)</b>						
China	17,363	15,825	17,625	12,780	11,744	12,553
Thailand	6,977	6,607	6,825	10,938	11,848	11,586
Taiwan	11,125	9,535	8,988	9,977	8,939	9,121
United States	11,995	7,105	3,353	8,781	8,015	7,065
Hong Kong	5,906	5,810	5,564	4,750	4,256	4,289
Australia	7,320	7,917	5,757	8,446	6,335	3,834
Singapore	3,351	3,309	2,541	2,504	2,418	2,992
Vietnam	1,638	2,654	3,720	1,567	1,604	2,243
Poland	3,226	5,425	5,146	1,880	940	1,166
Malaysia	576	755	2,403	2,582	1,740	977
All other destination markets	15,219	11,189	11,456	11,562	10,171	9,197
Total exports	84,696	76,131	73,377	75,769	68,009	65,025

Source: Official exports statistics under HS subheading 7312.10 as reported Global Trade Atlas database, accessed May 15, 2020.

<sup>71</sup> First Japan review 1999 publication, p. I-11; Second Japan review 2004 publication, p. I-15.

<sup>72</sup> This is based on the domestic interested parties' response to the notice of institution in those reviews. In its foreign producer questionnaire, Tesac Corp., a Japanese producer of PC strand, estimated that it accounted for \*\*\* percent of total PC strand production during 2008 and claimed to be the \*\*\* PC strand producer in Japan. First grouped review 2009 confidential report, pp. IV-40-IV-41.

<sup>73</sup> Domestic interested parties' response to the notice of institution, March 30, 2020, exh. 10.

## The industry in Korea

During the final phase of the original investigations concerning Brazil, India, Korea, Mexico, and Thailand, the Commission received foreign producer/exporter questionnaires from four firms, which accounted for approximately \*\*\* percent of PC strand exports from Korea to the United States during January 2000 to June 2003.<sup>74</sup> During the first grouped five-year reviews concerning Brazil, India, Japan, Korea, Mexico, and Thailand, the Commission received foreign producer/exporter questionnaires from two firms, which accounted for approximately \*\*\* percent of production of PC strand in Korea during 2008, and approximately \*\*\* percent of PC strand exports from Korea to the United States during 2008.<sup>75</sup> Although the Commission did not receive responses from any respondent interested parties in its second grouped five-year reviews concerning Brazil, India, Japan, Korea, Mexico, and Thailand or in these current five-year reviews, the domestic interested parties provided a list of four possible producers/exporters of PC strand in Korea in both proceedings.<sup>76</sup> Table I-11 presents the largest export markets for PC strand from Korea during 2014-19.

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<sup>74</sup> Original 2004 confidential report, p. VII-6.

<sup>75</sup> First grouped review 2009 confidential report, p. IV-45.

<sup>76</sup> Second grouped review 2015 publication, p. I-26; Domestic interested parties' response to the notice of institution, March 30, 2020, exh. 10.

**Table I-11**  
**PC strand: Exports from Korea, 2014-19**

Destination market	Calendar year					
	2014	2015	2016	2017	2018	2019
<b>Quantity (1,000 pounds)</b>						
United States	135,652	104,993	89,316	85,293	89,733	76,238
Japan	82,787	75,293	66,962	69,297	59,858	57,115
China	51,931	42,986	40,118	32,794	34,094	35,041
Taiwan	34,774	29,849	34,831	33,103	29,671	34,191
Singapore	45,845	32,333	27,388	30,367	31,655	25,645
Spain	7,445	16,809	25,355	28,265	33,131	23,842
Belgium	26,450	24,172	19,673	18,279	18,685	19,886
Poland	11,606	8,790	10,253	16,109	17,474	18,063
Thailand	24,413	23,596	31,861	28,602	15,602	17,720
Kuwait	1,062	616	404	357	2,472	17,515
All other destination markets	314,274	235,355	225,222	217,834	200,964	169,206
Total exports	736,238	594,792	571,386	560,300	533,339	494,461

Source: Official exports statistics under HS subheading 7312.10 as reported Global Trade Atlas database, accessed May 15, 2020.

## The industry in Mexico

During the final phase of the original investigations concerning Brazil, India, Korea, Mexico, and Thailand, the Commission received foreign producer/exporter questionnaires from two firms, which accounted for all production of PC strand in Mexico during 2002, and \*\*\* percent of PC strand exports from Mexico to the United States during January 2000 to June 2003.<sup>77</sup> During the first grouped five-year reviews concerning Brazil, India, Japan, Korea, Mexico, and Thailand, the Commission received foreign producer/exporter questionnaires from two firms, which accounted for all production of PC strand in Mexico during 2008.<sup>78</sup> Although the Commission did not receive responses from any respondent interested parties in its second grouped five-year reviews concerning Brazil, India, Japan, Korea, Mexico, and Thailand or these current five-year reviews, the domestic interested parties provided a list of two possible

<sup>77</sup> Original 2004 confidential report, p. VII-11.

<sup>78</sup> Prestressed Concrete Steel Wire Strand from Brazil, India, Japan, Korea, Mexico, and Thailand, Inv. Nos. 701-TA-432 and 731-TA-1024-1028 (Review) and AA1921-188 (Third Review), USITC Publication 4114, November 2009 (“First grouped review 2009 publication”), p. IV-27.

producers/exporters of PC strand in Mexico in each proceeding.<sup>79</sup> Table I-12 presents the largest export markets for PC strand from Mexico during 2014-19.

**Table I-12**  
**PC strand: Exports from Mexico, 2014-19**

Destination market	Calendar year					
	2014	2015	2016	2017	2018	2019
<b>Quantity (1,000 pounds)</b>						
United States	20,644	16,631	16,329	19,416	33,917	30,592
Peru	2,728	1,172	1,079	1,945	2,208	245
Costa Rica	312	1,350	1,505	880	1,540	40
El Salvador	22	82	155	81	18	16
Guatemala	107	195	118	413	133	15
Colombia	812	543	287	190	235	14
Canada	2,488	1,545	1,227	2,267	1,248	1
Virgin Islands (British)	—	—	0	0	—	—
Vietnam	—	—	—	24	—	—
Venezuela	476	12	47	10	2	—
All other destination markets	5,097	13,406	2,608	3,198	2,140	—
Total exports	32,684	34,937	23,353	28,424	41,442	30,922

Source: Official exports statistics under HS subheading 7312.10 as reported Global Trade Atlas database, accessed May 15, 2020.

## The industry in Thailand

During the final phase of the original investigations concerning Brazil, India, Korea, Mexico, and Thailand, the Commission received foreign producer/exporter questionnaires from four firms, which accounted for \*\*\* of total production of PC strand in Thailand during 2002, and \*\*\* exports from Thailand to the United States during 2002.<sup>80</sup> During the first grouped five-year reviews concerning Brazil, India, Japan, Korea, Mexico, and Thailand, the Commission received foreign producer/exporter questionnaires from one firm, which accounted for approximately \*\*\* percent of production of PC strand in Thailand during 2008, and which \*\*\* exported PC strand to the United States.<sup>81</sup> Although the Commission did not receive responses from any respondent interested parties in its second grouped five-year

<sup>79</sup> Second grouped review 2015 publication, p. I-27; Domestic interested parties' response to the notice of institution, March 30, 2020, exh. 10.

<sup>80</sup> Original 2004 confidential report, p. VII-17.

<sup>81</sup> First grouped review 2009 confidential report, p. IV-60.

reviews concerning Brazil, India, Japan, Korea, Mexico, and Thailand or in these current five-year reviews, the domestic interested parties provided a list of six possible producers/exporters of PC strand in Thailand in the prior proceeding and a list of five possible producers/exporters of PC strand in Thailand in this current proceeding.<sup>82</sup> Table I-13 presents the largest export markets for PC strand from Thailand during 2014-19.

**Table I-13**  
**PC strand: Exports from Thailand, 2014-19**

Destination market	Calendar year					
	2014	2015	2016	2017	2018	2019
<b>Quantity (1,000 pounds)</b>						
Australia	51,982	55,355	57,853	67,153	93,524	82,883
Vietnam	14,803	21,917	25,306	25,601	35,675	30,682
United States	29,977	28,999	27,206	20,688	30,391	30,226
United Kingdom	13,212	18,695	20,486	21,826	26,618	19,315
India	3,814	4,760	7,682	9,840	15,199	15,834
France	8,362	9,704	12,997	13,650	14,839	13,648
Taiwan	19,065	19,569	23,036	18,886	20,477	12,860
Malaysia	2,080	3,158	2,114	9,616	8,605	12,505
Philippines	4,594	1,792	4,493	6,743	11,462	11,936
Finland	9,232	11,213	10,602	6,705	20,194	11,206
All other destination markets	78,071	75,295	96,450	110,693	108,762	108,407
Total exports	235,191	250,458	288,223	311,401	385,744	349,502

Source: Official exports statistics under HS subheading 7312.10 as reported Global Trade Atlas database, accessed May 15, 2020.

## **Antidumping or countervailing duty orders in third-country markets**

Based on available information, PC strand from Brazil, India, Japan, Korea, Mexico, and Thailand have not been subject to antidumping or countervailing duty investigations outside the United States during the last 5 years.

However, during the first grouped review, the Commission reported that South Africa had antidumping (“AD”)/countervailing duty (“CVD”) orders in place on imports of PC strand from Korea (AD), India (CVD), and several other countries not subject to these investigations. The products covered by the orders from South Africa were defined as “stranded wire, of iron or steel, not electrically insulated, of a diameter exceeding 8 mm (excluding that of wire plated,

<sup>82</sup> Second grouped review 2015 publication, p. I-28; Domestic interested parties’ response to the notice of institution, March 30, 2020, exh. 10.

coated or clad with tin). Effective April 11, 2014, South Africa terminated the antidumping duty order on Korea and the countervailing duty order on India covering such imports.<sup>83</sup> The domestic industry parties in those reviews indicated that they would not be applying for a sunset review of the orders, and the South African government subsequently terminated the orders.<sup>84</sup>

## **The global market**

Table I-14 presents global export data for HS 7312.10, a category that includes PC strand and out-of-scope products, (by source in descending order of quantity for 2019). The quantity of global exports of PC strand increased by 0.3 percent from 2014-19. China was the largest global exporter of these products based on quantity and accounted for 39.8 percent of global exports by quantity in 2019.

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<sup>83</sup> First grouped review 2009 publication, pp. IV-16-IV-17.

<sup>84</sup> World Trade Organization, “Semi-Annual Report under Article 16.4 of the Agreement” (Committee on Anti-Dumping Practices) and “Semi-Annual Report under Article 25.11 of the Agreement” (Committee on Subsidies and Countervailing Measures), accessed May 4, 2020.



**Table I-14**  
**Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Global exports by major sources, 2014-19**

Exporter	Calendar year					
	2014	2015	2016	2017	2018	2019
<b>Quantity (1,000 pounds)</b>						
China	2,169,227	2,346,774	2,395,126	2,464,042	2,509,237	2,700,280
South Korea	736,237	594,793	571,385	560,300	533,339	494,461
Thailand	235,191	250,458	288,223	311,400	385,745	349,503
Malaysia	275,196	243,141	228,390	248,637	224,305	271,005
Turkey	147,110	118,549	117,224	154,698	182,258	230,676
Italy	248,677	280,461	272,447	287,571	267,176	221,952
Germany	193,689	208,663	214,324	226,734	233,954	221,549
Portugal	152,987	167,095	185,949	231,624	196,022	182,353
Romania	91,196	121,181	162,511	155,210	171,301	179,586
India	169,174	113,791	147,908	134,843	168,477	164,780
All other exporters	2,354,523	2,385,650	2,362,475	2,293,023	2,394,674	1,775,508
Total	6,773,208	6,830,557	6,945,962	7,068,082	7,266,487	6,791,654

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

Source: Global Trade Information Services, Inc., Global Trade Atlas, HTS subheading 7312.10. These data may be overstated as HTS subheading 7312.10 may contain products outside the scope of these reviews.



**APPENDIX A**

***FEDERAL REGISTER NOTICES***



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

Citation	Title	Link
85 FR 12253 March 2, 2020	<i>Initiation of Five-Year (Sunset) Reviews</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2020-03-02/pdf/2020-04216.pdf">https://www.govinfo.gov/content/pkg/FR-2020-03-02/pdf/2020-04216.pdf</a>
85 FR 12331 March 2, 2020	<i>Prestressed Concrete Steel Wire Strand from Brazil, India, Japan, Korea, Mexico, and Thailand; Institution of Five-Year Reviews</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2020-03-02/pdf/2020-04078.pdf">https://www.govinfo.gov/content/pkg/FR-2020-03-02/pdf/2020-04078.pdf</a>



**APPENDIX B**  
**COMPANY-SPECIFIC DATA**





\* \* \* \* \*



**APPENDIX C**

**SUMMARY DATA COMPILED IN PRIOR PROCEEDINGS**



Table C-1

## PC strand: Summary data concerning the U.S. market, 2000-02, January-June 2002, and January-June 2003

(Quantity=1,000 pounds; value=1,000 dollars; unit values, unit labor costs, and unit expenses are per 1,000 pounds; and period changes=percent, except where noted)

Item	Reported data					Period changes			
	Calendar year			January-June		Calendar year			Jan.-June
	2000	2001	2002	2002	2003	2000-2002	2000-2001	2001-2002	2002-2003
U.S. consumption quantity: Amount	785,818	761,201	748,182	371,142	404,053	-4.8	-3.1	-1.7	8.9
Producers' share <sup>1</sup>	76.8	73.8	69.7	70.0	69.8	-7.2	-3.0	-4.1	-0.2
Importers' share: <sup>1</sup>									
Brazil	***	***	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***	***	***
Korea	***	***	***	***	***	***	***	***	***
Mexico	***	***	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***	***	***
Subtotal	15.1	17.0	22.0	21.0	21.5	6.9	1.9	5.1	0.5
Other sources	8.1	9.2	8.3	9.0	8.7	0.2	1.2	-0.9	-0.3
Total	23.2	26.2	30.3	30.0	30.2	7.2	3.0	4.1	0.2
U.S. consumption value: Amount	207,066	194,048	181,395	89,134	100,510	-12.4	-6.3	-6.5	12.8
Producers' share <sup>1</sup>	77.0	73.7	69.9	69.5	68.7	-7.1	-3.3	-3.8	-0.8
Importers' share: <sup>1</sup>									
Brazil	***	***	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***	***	***
Korea	***	***	***	***	***	***	***	***	***
Mexico	***	***	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***	***	***
Subtotal	14.9	16.6	21.8	21.2	22.3	6.9	1.7	5.2	1.1
Other sources	8.1	9.8	8.3	9.3	9.0	0.2	1.6	-1.4	-0.4
Total	23.0	26.3	30.1	30.5	31.3	7.1	3.3	3.8	0.8
U.S. shipments of imports from--									
Brazil:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory	***	***	***	***	***	***	***	***	***
India:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory	***	***	***	***	***	***	***	***	***
Korea:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory	***	***	***	***	***	***	***	***	***

Table continued on next page.

Table C-1--Continued

PC strand: Summary data concerning the U.S. market, 2000-02, January-June 2002, and January-June 2003

(Quantity=1,000 pounds; value=1,000 dollars; unit values, unit labor costs, and unit expenses are per 1,000 pounds; and period changes=percent, except where noted)

Item	Reported data					Period changes			
	Calendar year			January-June		Calendar year			Jan.-June
	2000	2001	2002	2002	2003	2000-2002	2000-2001	2001-2002	2002-2003
U.S. shipments of imports from--									
Mexico:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory	***	***	***	***	***	***	***	***	***
Thailand:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory	***	***	***	***	***	***	***	***	***
Subtotal:									
Quantity	118,623	129,210	164,878	77,959	86,739	39.0	8.9	27.6	11.3
Value	30,845	32,134	39,509	18,878	22,416	28.1	4.2	23.0	18.7
Unit value	\$260.03	\$248.69	\$239.62	\$242.16	\$258.43	-7.8	-4.4	-3.6	6.7
Ending inventory	5,441	4,634	5,460	5,985	5,021	0.3	-14.8	17.8	-16.1
Other sources: <sup>3</sup>									
Quantity	63,340	70,167	61,981	33,340	35,250	-2.1	10.8	-11.7	5.7
Value	16,837	18,955	15,108	8,294	8,998	-10.3	12.6	-20.3	8.5
Unit value	\$265.82	\$270.13	\$243.75	\$248.78	\$255.27	-8.3	1.6	-9.8	2.6
Ending inventory	***	***	***	***	***	***	***	***	***
All sources:									
Quantity	181,963	199,377	226,859	111,299	121,989	24.7	9.6	13.8	9.6
Value	47,682	51,089	54,617	27,172	31,414	14.5	7.1	6.9	15.6
Unit value	\$262.04	256.2428	240.7531	244.1362	\$257.51	-8.1	-2.2	-6.0	5.5
Ending inventory	***	***	***	***	***	***	***	***	***
U.S. producers <sup>4</sup> --									
Capacity quantity	714,675	732,475	763,577	390,242	375,060	6.8	2.5	4.2	-3.9
Production quantity	633,505	576,210	539,601	259,785	276,093	-14.8	-9.0	-6.4	6.3
Capacity utilization <sup>1</sup>	88.6	78.7	70.7	66.6	73.6	-18.0	-10.0	-8.0	7.0
U.S. shipments:									
Quantity	603,855	561,824	521,323	259,843	282,064	-13.7	-7.0	-7.2	8.6
Value	159,384	142,959	126,778	61,961	69,096	-20.5	-10.3	-11.3	11.5
Unit value	\$263.94	\$254.46	\$243.19	\$238.46	\$244.97	-7.9	-3.6	-4.4	2.7
Export shipments:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	51,918	53,043	47,117	42,542	33,940	-9.2	2.2	-11.2	-20.2
Inventories/total shipments <sup>1</sup>	***	***	***	***	***	***	***	***	***

Table continued on next page.

**Table C-1--Continued**

**PC strand: Summary data concerning the U.S. market, 2000-02, January-June 2002, and January-June 2003**

(Quantity=1,000 pounds; value=1,000 dollars; unit values, unit labor costs, and unit expenses are per 1,000 pounds; and period changes=percent, except where noted)

Item	Reported data					Period changes			
	Calendar year			January-June		Calendar year			Jan.-June
	2000	2001	2002	2002	2003	2000-2002	2000-2001	2001-2002	2002-2003
Production workers	409	353	308	289	290	-24.8	-13.7	-12.9	0.3
Hours worked (1,000 hours)	926	788	671	330	341	-27.5	-14.8	-14.9	3.5
Wages paid (1,000 dollars)	13,481	12,109	10,171	4,984	5,324	-24.6	-10.2	-16.0	6.8
Hourly wages	\$14.56	\$15.36	\$15.15	\$15.12	\$15.61	4.1	5.5	-1.3	3.2
Productivity (pounds per hour)	684.3	730.9	803.9	750.6	780.8	17.5	6.8	10.0	4.0
Unit labor costs	\$21.28	\$21.01	\$18.85	\$20.14	\$19.99	-11.4	-1.2	-10.3	-0.8
Net sales:									
Quantity	624,730	573,985	545,527	260,014	278,623	-12.7	-8.1	-5.0	7.2
Value	164,347	145,849	132,712	61,690	69,015	-19.2	-11.3	-9.0	11.9
Unit value	\$263.07	\$254.10	\$243.27	\$237.26	\$247.70	-7.5	-3.4	-4.3	4.4
COGS	139,500	133,909	125,756	58,177	63,341	-9.9	-4.0	-6.1	8.9
Gross profit or (loss)	24,847	11,940	6,956	3,513	5,674	-72.0	-51.9	-41.7	61.5
SG&A expenses	12,339	9,874	12,805	8,488	3,917	3.8	-20.0	29.7	-53.9
Operating income or (loss)	12,508	2,066	(5,849)	(4,975)	1,757	(5)	-83.5	(5)	(5)
Capital expenditures	4,500	12,462	2,430	1,373	419	-46.0	176.9	-80.5	-69.5
Unit COGS	\$223.30	\$233.30	\$230.52	\$223.75	\$227.34	3.2	4.5	-1.2	1.6
Unit SG&A expenses	\$19.75	\$17.20	\$23.47	\$32.64	\$14.06	18.8	-12.9	36.4	-56.9
Unit operating income or (loss)	\$20.02	\$3.60	\$(10.72)	\$(19.13)	\$6.31	(5)	-82.0	(5)	(5)
COGS/sales <sup>1</sup>	84.9	91.8	94.8	94.3	91.8	9.9	6.9	2.9	-2.5
Operating income or (loss)/sales <sup>1</sup>	7.6	1.4	(4.4)	(8.1)	2.5	-12.0	-6.2	-5.8	10.6

<sup>1</sup> "Reported data" are in percent and "period changes" are in percentage points.  
<sup>2</sup> Not applicable.  
<sup>3</sup> U.S. imports from all other sources.  
<sup>4</sup> U.S. producer data are for uncoated plus coated PC strand; to avoid double-counting, combined data have been adjusted to remove internal consumption of uncoated product.  
<sup>5</sup> Undefined.

Note.--Because of rounding, figures may not add to the totals shown. Unit values and shares are calculated from the unrounded figures.

Source: Compiled from data submitted in response to Commission questionnaires and from official Commerce statistics.

**Table C-2**

**Uncoated PC strand: Summary data concerning the U.S. market, 2000-02, January-June 2002, and January-June 2003**

\* \* \* \* \*

**Table C-3**

**Coated PC strand: Summary data concerning the U.S. market, 2000-02, January-June 2002, and January-June 2003**

\* \* \* \* \*

**Table C-1**  
**PC strand: Summary data concerning the U.S. market, 2003-08, January-June 2008, and January-June 2009**

(Quantity=1,000 pounds, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per thousand pounds; period changes=percent, except where noted)															
Item	Reported data								Period changes						
	2003	2004	2005	2006	2007	2008	January-June		2003-08	2003-04	2004-05	2005-06	2006-07	2007-08	Jan.-June
							2008	2009							2008-09
<b>U.S. consumption quantity:</b>															
Amount	805,929	859,433	907,092	1,112,214	980,504	942,713	557,809	229,130	17.0	6.6	5.5	22.6	-11.8	-3.9	-58.9
Producers' share (1)	70.0	66.8	68.6	56.4	59.4	56.2	58.4	79.9	-13.8	-3.2	1.8	-12.1	3.0	-3.2	21.5
Importers' share (1):															
Brazil	2.7	0.1	0.0	0.0	0.0	0.0	0.0	0.0	-2.7	-2.6	-0.1	0.0	0.0	0.0	0.0
India	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-0.4	-0.4	-0.0	-0.0	0.0	-0.0	0.0
Korea	4.6	0.0	0.0	0.4	0.3	0.4	0.3	0.0	-4.2	-4.5	-0.0	0.3	-0.1	0.1	-0.3
Mexico	4.7	0.1	0.1	0.1	0.2	0.2	0.1	1.0	-4.6	-4.6	-0.0	0.1	0.1	-0.1	0.8
Thailand	0.8	0.7	0.1	0.0	0.0	0.0	0.0	0.0	-0.8	-0.2	-0.6	-0.1	-0.0	0.0	0.0
Subtotal, 5 subject	13.2	0.9	0.2	0.5	0.5	0.5	0.4	1.0	-12.7	-12.4	-0.7	0.3	0.0	-0.0	0.6
Subject Japan	0.1	0.2	0.2	0.1	0.2	0.1	0.2	0.0	0.1	0.1	-0.0	-0.0	0.1	-0.1	-0.2
Subtotal, 6 subject	13.3	1.0	0.3	0.6	0.7	0.7	0.7	1.0	-12.7	-12.3	-0.7	0.3	0.1	-0.1	0.4
All other sources	16.7	32.2	31.1	42.9	39.8	43.1	41.0	19.1	26.4	15.5	-1.1	11.8	-3.1	3.3	-21.9
Total	30.0	33.2	31.4	43.6	40.6	43.8	41.6	20.1	13.8	3.2	-1.8	12.1	-3.0	3.2	-21.5
<b>U.S. consumption value:</b>															
Amount	215,223	353,511	425,623	465,112	407,169	549,768	284,301	118,835	155.4	64.3	20.4	9.3	-12.5	35.0	-58.2
Producers' share (1)	71.3	71.9	70.8	63.9	65.9	60.7	63.0	82.4	-10.6	0.6	-1.1	-6.9	2.0	-5.2	19.4
Importers' share (1):															
Brazil	2.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-2.1	-2.1	-0.0	0.0	0.0	0.0	0.0
India	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-0.3	-0.3	-0.0	-0.0	0.0	0.0	0.0
Korea	3.7	0.0	0.0	0.3	0.3	0.4	0.4	0.0	-3.3	-3.7	-0.0	0.3	0.0	0.1	-0.3
Mexico	5.4	0.1	0.0	0.2	0.3	0.2	0.1	0.8	-5.2	-5.3	-0.0	0.1	0.1	-0.1	0.7
Thailand	0.7	0.5	0.1	0.0	0.0	0.0	0.0	0.0	-0.7	-0.2	-0.5	-0.1	-0.0	0.0	0.0
Subtotal, 5 subject	12.3	0.7	0.2	0.5	0.6	0.6	0.5	0.9	-11.7	-11.6	-0.6	0.3	0.1	-0.0	0.4
Subject Japan	0.2	0.2	0.3	0.2	0.3	0.2	0.3	0.0	-0.0	0.1	0.0	-0.0	0.1	-0.2	-0.3
Subtotal, 6 subject	12.5	1.0	0.4	0.7	0.9	0.8	0.8	0.9	-11.7	-11.5	-0.5	0.3	0.2	-0.2	0.1
All other sources	16.3	27.2	28.8	35.3	33.1	38.5	36.2	16.7	22.3	10.9	1.6	6.6	-2.2	5.4	-19.5
Total	28.7	28.1	29.2	36.1	34.1	39.3	37.0	17.6	10.6	-0.6	1.1	6.9	-2.0	5.2	-19.4
<b>U.S. imports from:</b>															
<b>Brazil:</b>															
Quantity	21,511	449	0	0	0	0	0	0	-100.0	-97.9	-100.0	(2)	(2)	(2)	(2)
Value	4,610	168	0	0	0	0	0	0	-100.0	-96.4	-100.0	(2)	(2)	(2)	(2)
Unit value	\$214	\$373	(2)	(2)	(2)	(2)	(2)	(2)	(2)	74.1	(2)	(2)	(2)	(2)	(2)
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
<b>India:</b>															
Quantity	3,210	34	2	2	235	209	0	0	-93.5	-98.9	-93.9	-22.7	14,326.6	-11.2	(2)
Value	704	41	17	9	81	156	0	0	-77.9	-94.1	-59.7	-48.7	843.4	92.3	(2)
Unit value	\$219	\$1,208	\$7,934	\$5,265	\$344	\$746	(2)	(2)	239.9	450.5	556.7	-33.6	-93.5	116.7	(2)
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
<b>Korea:</b>															
Quantity	36,934	316	258	3,958	2,831	3,325	1,661	86	-91.0	-99.1	-18.2	1,432.8	-28.5	17.5	-94.8
Value	7,995	167	196	1,506	1,399	2,201	1,081	54	-72.5	-97.9	17.6	668.8	-7.1	57.3	-95.0
Unit value	\$216	\$527	\$759	\$380	\$494	\$662	\$651	\$624	205.7	143.6	43.8	-49.8	29.9	33.9	-4.2
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
<b>Mexico:</b>															
Quantity	38,257	867	555	1,526	2,283	1,514	759	2,214	-96.0	-97.7	-36.0	175.1	49.6	-33.7	191.5
Value	11,534	290	187	729	1,036	885	377	997	-92.3	-97.5	-35.7	290.5	42.1	-14.5	164.5
Unit value	\$301	\$335	\$337	\$478	\$454	\$584	\$496	\$450	93.9	11.1	0.5	41.9	-5.1	28.8	-9.3
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
<b>Thailand:</b>															
Quantity	6,791	5,800	624	45	0	0	0	0	-100.0	-14.6	-89.2	-92.7	-100.0	(2)	(2)
Value	1,572	1,819	240	25	0	0	0	0	-100.0	15.7	-86.8	-89.8	-100.0	(2)	(2)
Unit value	\$231	\$314	\$385	\$543	(2)	(2)	(2)	(2)	(2)	35.5	22.7	41.0	(2)	(2)	(2)
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
<b>Subtotal, 5 subject:</b>															
Quantity	106,703	7,466	1,439	5,530	5,349	5,048	2,421	2,300	-95.3	-93.0	-80.7	284.3	-3.3	-5.6	-5.0
Value	26,415	2,485	640	2,268	2,516	3,241	1,458	1,051	-87.7	-90.6	-74.3	254.6	10.9	28.8	-27.9
Unit value	\$248	\$333	\$444	\$410	\$470	\$642	\$602	\$457	159.4	34.5	33.5	-7.7	14.7	36.5	-24.2
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
<b>Japan:</b>															
Quantity	768	1,545	1,564	1,580	1,952	1,380	1,224	0	79.7	101.1	1.3	1.0	23.5	-29.3	-100.0
Value	399	876	1,092	1,100	1,343	916	874	0	129.8	119.7	24.7	0.7	22.1	-31.8	-100.0
Unit value	\$519	\$567	\$698	\$696	\$688	\$663	\$715	(2)	27.8	9.2	23.1	-0.3	-1.1	-3.6	(2)
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
<b>Subtotal, 6 subject:</b>															
Quantity	107,471	9,011	3,003	7,111	7,301	6,429	3,644	2,300	-94.0	-91.6	-66.7	136.8	2.7	-11.9	-36.9
Value	26,813	3,361	1,732	3,368	3,859	4,157	2,333	1,051	-84.5	-87.5	-48.5	94.5	14.6	7.7	-55.0
Unit value	\$249	\$373	\$577	\$474	\$529	\$647	\$640	\$457	159.2	49.5	54.6	-17.9	11.6	22.3	-28.6
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
<b>All other sources:</b>															
Quantity	134,423	276,723	282,247	477,667	390,402	406,312	228,681	43,806	202.3	105.9	2.0	69.2	-18.3	4.1	-80.8
Value	34,990	95,994	122,471	164,334	134,966	211,890	102,835	19,839	505.6	174.3	27.6	34.2	-17.9	57.0	-80.7
Unit value	\$260	\$347	\$434	\$344	\$346	\$521	\$450	\$453	100.3	33.3	25.1	-20.7	0.5	50.8	0.7
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
<b>All sources:</b>															
Quantity	241,894	285,733	285,250	484,778	397,703	412,741	232,325	46,106	70.6	18.1	-0.2	69.9	-18.0	3.8	-80.2
Value	61,803	99,355	124,203	167,702	138,825	216,047	105,168	20,889	249.6	60.8	25.0	35.0	-17.2	55.6	-80.1
Unit value	\$255	\$348	\$435	\$346	\$349	\$523	\$453	\$453	104.9	36.1	25.2	-20.6	0.9	50.0	0.1
Ending inventory quantity	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***

Table continued on next page.



**Table C-1--Continued**  
**PC strand: Summary data concerning the U.S. market, 2003-08, January-June 2008, and January-June 2009**

(Quantity=1,000 pounds, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per pound; period changes=percent, except where noted)															
Item	Reported data							Period changes							
	2003	2004	2005	2006	2007	2008	January-June 2008	January-June 2009	2003-08	2003-04	2004-05	2005-06	2006-07	2007-08	Jan.-June 2008-09
<b>U.S. producers:</b>															
Average capacity quantity . . . . .	742,295	754,653	791,653	810,653	902,782	903,795	454,684	456,277	21.8	1.7	4.9	2.4	11.4	0.1	0.4
Production quantity . . . . .	578,004	608,562	621,919	673,195	601,732	558,885	327,355	172,375	-3.3	5.3	2.2	8.2	-10.6	-7.1	-47.3
Capacity utilization (1) . . . . .	77.9	80.6	78.6	83.0	66.7	61.8	72.0	37.8	-16.0	2.8	-2.1	4.5	-16.4	-4.8	-34.2
<b>U.S. shipments:</b>															
Quantity . . . . .	564,035	573,700	621,842	627,436	582,801	529,972	325,484	183,024	-6.0	1.7	8.4	0.9	-7.1	-9.1	-43.8
Value . . . . .	153,420	254,156	301,420	297,410	268,344	333,721	179,133	97,946	117.5	65.7	18.6	-1.3	-9.8	24.4	-45.3
Unit value . . . . .	\$272	\$443	\$489	\$474	\$460	\$630	\$550	\$535	131.5	62.9	10.4	-3.0	-2.9	36.8	-2.8
<b>Export shipments:</b>															
Quantity . . . . .	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Value . . . . .	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Unit value . . . . .	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Ending inventory quantity . . . . .	38,343	59,605	44,596	68,014	61,262	67,082	47,677	51,281	75.0	55.5	-25.2	52.5	-9.9	9.5	7.6
Inventories/total shipments (1) . . . . .	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Production workers . . . . .	315	335	364	385	357	331	337	253	5.1	6.3	8.7	5.8	-7.3	-7.3	-24.9
Hours worked (1,000s) . . . . .	762	744	784	856	771	694	392	244	-8.9	-2.5	5.5	9.1	-9.9	-10.0	-37.6
Wages paid (\$1,000) . . . . .	11,658	12,764	14,302	16,963	14,145	13,264	7,933	4,592	13.8	9.5	12.0	18.6	-16.6	-6.2	-42.1
Hourly wages . . . . .	\$15.30	\$17.17	\$18.24	\$19.82	\$18.34	\$19.11	\$20.25	\$18.79	24.9	12.2	6.2	8.7	-7.5	4.2	-7.2
Productivity (pounds per hour) . . . . .	758.3	818.5	793.2	786.7	780.1	805.0	835.7	705.3	6.2	7.9	-3.1	-0.8	-0.8	3.2	-15.6
Unit labor costs . . . . .	\$20.17	\$20.97	\$23.00	\$25.20	\$23.51	\$23.73	\$24.23	\$26.64	17.7	4.0	9.6	9.6	-6.7	1.0	9.9
<b>Net sales:</b>															
Quantity . . . . .	564,937	610,678	605,636	661,470	613,704	589,793	341,238	188,242	4.4	8.1	-0.8	9.2	-7.2	-3.9	-44.8
Value . . . . .	150,480	249,170	299,892	312,046	283,088	354,082	191,146	100,343	135.3	65.6	20.4	4.1	-9.3	25.1	-47.5
Unit value . . . . .	\$266	\$408	\$495	\$472	\$461	\$600	\$560	\$533	125.4	53.2	21.4	-4.7	-2.2	30.1	-4.8
Cost of goods sold (COGS) . . . . .	135,503	193,659	235,830	248,909	230,394	302,334	153,600	101,280	123.1	42.9	21.8	5.5	-7.4	31.2	-34.1
Gross profit or (loss) . . . . .	14,977	55,511	64,062	63,137	52,694	51,748	37,546	(937)	245.5	270.6	15.4	-1.4	-16.5	-1.8	(3)
SG&A expenses . . . . .	9,887	13,251	13,233	14,648	13,317	13,795	7,128	6,603	39.5	34.0	-0.1	10.7	-9.1	3.6	-7.4
Operating income or (loss) . . . . .	5,090	42,260	50,829	48,489	39,377	37,953	30,418	(7,540)	645.6	730.3	20.3	-4.6	-18.8	-3.6	(3)
Capital expenditures . . . . .	***	***	***	***	***	***	***	***	***	***	***	***	***	***	***
Unit COGS . . . . .	\$240	\$317	\$389	\$376	\$375	\$513	\$450	\$538	113.7	32.2	22.8	-3.4	-0.2	36.5	19.5
Unit SG&A expenses . . . . .	\$18	\$22	\$22	\$22	\$22	\$23	\$21	\$35	33.6	24.0	0.7	1.3	-2.0	7.8	67.9
Unit operating income or (loss) . . . . .	\$9	\$69	\$84	\$73	\$64	\$64	\$89	(\$40)	614.2	668.1	21.3	-12.7	-12.5	0.3	(3)
COGS/sales (1) . . . . .	90.0	77.7	78.6	79.8	81.4	85.4	80.4	100.9	-4.7	-12.3	0.9	1.1	1.6	4.0	20.6
Operating income or (loss)/ sales (1) . . . . .	3.4	17.0	16.9	15.5	13.9	10.7	15.9	(7.5)	7.3	13.6	-0.0	-1.4	-1.6	-3.2	-23.4

(1) "Reported data" are in percent and "period changes" are in percentage points.  
(2) Not applicable.  
(3) Undefined.

Note.--Financial data are reported on a fiscal year basis and may not necessarily be comparable to data reported on a calendar year basis. Because of rounding, figures may not add to the totals shown. Unit values and shares are calculated from the unrounded figures.

Source: Compiled from data submitted in response to Commission questionnaires and from official Commerce statistics.



**APPENDIX D**

**PURCHASER QUESTIONNAIRE RESPONSES**



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

1. Have there been any significant changes in the supply and demand conditions for PC strand that have occurred in the United States or in the market for PC strand in Brazil, India, Japan, Korea, Mexico, and/or Thailand since January 1, 2014?

<b>Purchaser</b>	<b>Yes / No</b>	<b>Changes that have occurred</b>
***	***	***
***	***	***

2. Do you anticipate any significant changes in the supply and demand conditions for PC strand in the United States or in the market for PC strand in Brazil, India, Japan, Korea, Mexico, and/or Thailand a within a reasonably foreseeable time?

<b>Purchaser</b>	<b>Yes / No</b>	<b>Changes that have occurred</b>
***	***	***
***	***	***

