

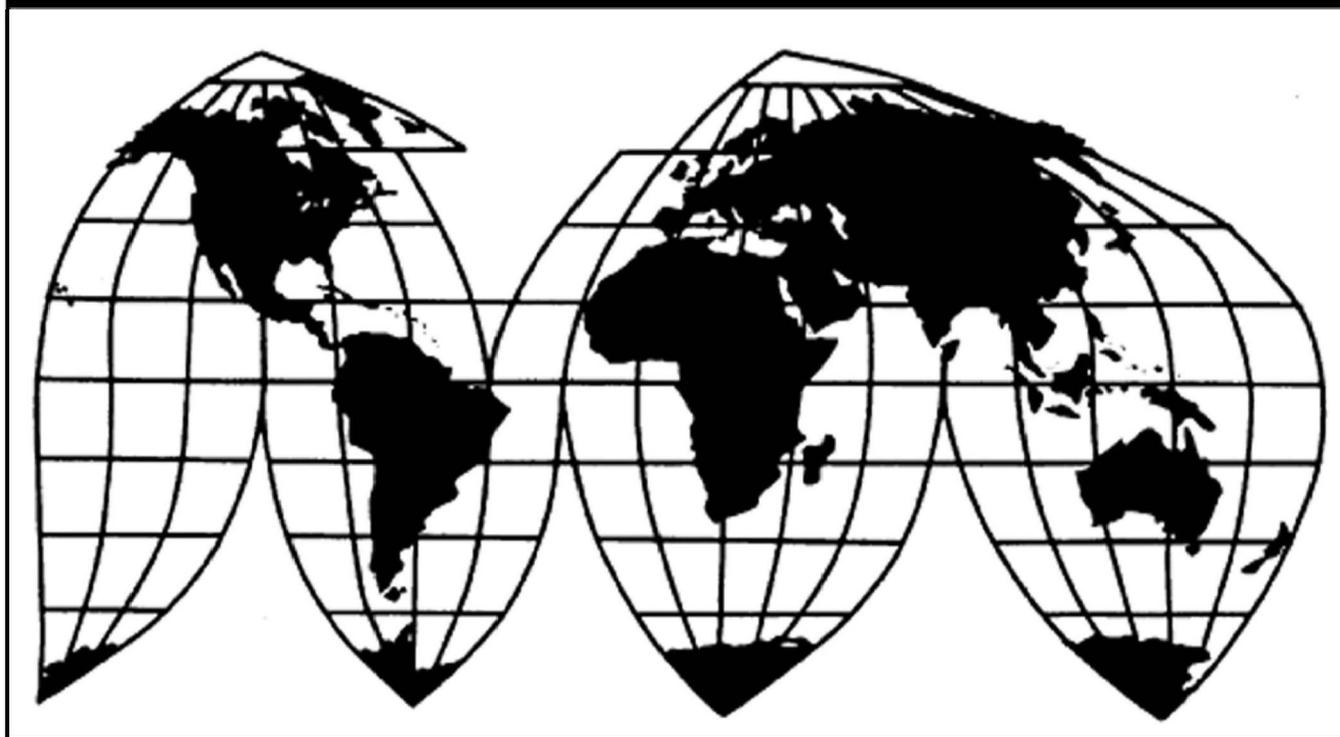
Utility Scale Wind Towers from Spain

Investigation No. 731-TA-1545 (Final)

Publication 5219

August 2021

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Note.—Information that would reveal confidential operations of individual concerns may not be published.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 in confidential reports and is deleted and replaced with asterisks (***) in public reports.

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation No. 731-TA-1545 (Final)

Utility Scale Wind Towers from Spain

DETERMINATION

On the basis of the record¹ developed in the subject investigation, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that an industry in the United States is materially injured by reason of imports of utility scale wind towers (“wind towers”) from Spain, provided for in subheadings 7308.20.00 and 8502.31.00 of the Harmonized Tariff Schedule of the United States, that have been found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”).²

BACKGROUND

The Commission instituted antidumping and countervailing duty investigations effective September 30, 2020, following receipt of petitions filed with the Commission and Commerce by the Wind Tower Trade Coalition (Arcosa Wind Towers Inc., Dallas, Texas; and Broadwind Towers, Inc., Manitowoc, Wisconsin). The Commission established a general schedule for the conduct of the final phase of its investigations on wind towers from India, Malaysia, and Spain following preliminary determinations by Commerce that imports of wind towers were subsidized by the governments of India and Malaysia. Notice of the scheduling of the final phase of the Commission’s investigations and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* of April 16, 2021 (86 FR 20197). Counsel for the Wind Tower Trade Coalition withdrew its previously filed request to appear at the hearing, after no other parties submitted a request to appear, and indicated a willingness to submit written responses to any Commission

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

² 86 FR 33656, June 25, 2021.

questions in lieu of a hearing. Consequently, since no party to the proceeding requested a hearing, the Commission canceled its hearing in connection with this proceeding (86 FR 31730, June 9, 2021). Parties to this proceeding responded to written questions posed by the Commission in their posthearing briefs.

The investigation schedules became staggered when Commerce did not align its countervailing duty investigation with its antidumping duty investigation regarding imports from Malaysia (86 FR 27828, May 24, 2021), nor with its antidumping duty investigation regarding imports from Spain (86 FR 17373, Apr. 2, 2021), while it aligned its countervailing duty investigation regarding imports from India with that of its corresponding postponed antidumping duty investigation, and postponed its antidumping duty investigation regarding Malaysia (86 FR 15897, Mar. 25, 2021; 86 FR 38274, July 20, 2021; 86 FR 27828, May 24, 2021). On July 26, 2021, the Commission issued a final affirmative determination in its countervailing duty investigation of wind towers from Malaysia (86 FR 41087, July 30, 2021). Following notification of a final determination by Commerce that imports of wind towers from Spain were being sold at LTFV within the meaning of section 735(a) of the Act (19 U.S.C. 1673d(a)), notice of the supplemental scheduling of the final phase of the Commission's antidumping duty investigation regarding Spain was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* of July 9, 2021 (86 FR 36305).

Views of the Commission

Based on the record in the final phase of this investigation, we determine that an industry in the United States is materially injured by reason of imports of utility scale wind towers (“wind towers”) from Spain found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”).

I. Background

The petitions in the antidumping and countervailing duty investigations of wind towers from India, Malaysia, and Spain were filed on September 30, 2020, by the Wind Tower Trade Coalition (“Petitioner” or “the Coalition”).¹ The investigation schedules became staggered, however, when Commerce did not align its countervailing duty investigation with its antidumping duty investigation regarding imports from Malaysia,² nor with its antidumping duty investigation regarding imports from Spain,³ while it aligned its countervailing duty investigation regarding imports from India with that of its corresponding postponed antidumping duty investigation, and postponed its antidumping duty investigation regarding Malaysia.⁴ Commerce published its final countervailing duty determination regarding Malaysia

¹ The Coalition consists of two domestic producers of wind towers, Arcosa Wind Towers Inc. and Broadwind Towers, Inc. Confidential Report, INV-TT-088 (July 19, 2021) (“Supplemental CR”) at I-1; *Utility Scale Wind Towers from Spain*, Inv. No. 731-TA-1545 (Final), USITC Pub. 5219 (Aug. 2021) (“Supplemental PR”) at I-1.

² *Utility Scale Wind Towers From Malaysia: Preliminary Determination of Sales Not Less Than Fair Value and Postponement of Final Determination*, 86 Fed. Reg. 27828 (May 24, 2021). Commerce will align antidumping and countervailing duty investigations filed on the same day and for the same product where the petitioner requests such an alignment. See 19 U.S.C. § 1671d (a)(1); see also 19 C.F.R. § 351.210(b)(4)(i). Petitioner did not request an alignment of these investigations.

³ *Utility Scale Wind Towers From Spain: Preliminary Affirmative Determination of Sales at Less Than Fair Value*, 86 Fed. Reg. 17354 (Apr. 2, 2021).

⁴ *Utility Scale Wind Towers From India: Preliminary Affirmative Countervailing Duty Determination, and Alignment of Final Determination With Final Antidumping Duty Determination*, 86 Fed. Reg. 15897 (March 25, 2021); *Utility Scale Wind Towers From India: Postponement of Final Determination of Sales Not Less Than Fair Value*, 86 Fed. Reg. 38274 (July 20, 2021); *Utility Scale Wind Towers From Malaysia: Preliminary Determination of Sales Not Less Than Fair Value and Postponement of Final Determination*, 86 Fed. Reg. 27828 (May 24, 2021).

on June 9, 2021.⁵ This necessitated an earlier final determination by the Commission in its countervailing duty investigation regarding Malaysia (the “leading” investigation).⁶ Commerce subsequently published its final affirmative determination regarding LTFV imports of wind towers from Spain on June 25, 2021.⁷ As a result, the Commission must now make its determination in the antidumping duty investigation on wind towers from Spain (the “trailing Spain investigation”) and will make its determinations in the other trailing investigations at later dates following Commerce’s related final determinations.⁸ Pursuant to the statutory provision on staggered investigations, the record for the investigations on all subject countries closed on June 29, 2021, except that Commerce’s final determination regarding subject imports from Spain and petitioner’s final comments concerning this determination have been added to the record.^{9 10}

II. Negligible Imports

Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product that account for less than 3 percent of all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition shall generally be deemed negligible.¹¹

⁵ *Utility Scale Wind Towers From Malaysia: Final Affirmative Countervailing Duty Determination*, 86 Fed. Reg. 30593 (June 9, 2021).

⁶ *See Utility Scale Wind Towers From Malaysia*, 701-TA-661 (Final), USITC Pub. 5215 (July 2021) (“*Wind Towers Leading Determination*”).

⁷ *Utility Scale Wind Towers From Spain: Final Determination of Sales at Less Than Fair Value*, 86 Fed. Reg. 33656 (June 25, 2021).

⁸ Commerce is currently scheduled to issue its final antidumping and countervailing duty determinations in the investigations regarding India by Aug. 2, 2021, and its final antidumping duty determination in the investigation regarding Malaysia on Oct. 1, 2021. Supplemental CR/Supplemental PR at I-2.

⁹ *See* 19 U.S.C. § 1677(7)(G)(iii).

¹⁰ Petitioner filed supplemental final comments concerning this determination. Petitioner’s Supplemental Final Comments, EDIS Doc. 746174 (July 7, 2021) (“Supplemental Final Comments”). Although no respondent parties filed supplemental final comments, arguments regarding the appropriate dumping margin for Spain were discussed by Siemens Gamesa Renewable Energy, a U.S. importer of subject merchandise, and Windar Renovables SL, a producer and exporter of subject merchandise in Spain (collectively, “SGRE”), in its prehearing brief in the leading investigation. SGRE’s Prehearing Br., EDIS Doc. 744002 (June 4, 2021) (“SGRE Prehearing Br.”).

¹¹ 19 U.S.C. § 1677(24)(A)(i).

During the 12-month period prior to the filing of the petition (September 2019 through August 2020), imports of wind towers from Spain subject to the antidumping duty investigation accounted for *** percent of total imports.¹² Subject imports thus are not less than the three percent individual statutory negligibility threshold applicable to an antidumping duty investigation. Accordingly, we find that subject imports from Spain are not negligible.¹³

III. Material Injury

Section 771(7)(G)(iii) of the Tariff Act of 1930, as amended (“the Act”), provides that the Commission must make its material injury determination in the trailing Spain investigation on the basis of the same record as that in the leading investigation, except to the extent discussed above.¹⁴ Therefore, in this investigation, we adopt the findings and analyses from our determination and views regarding subject imports from the leading investigation with respect to issues of domestic like product, domestic industry, cumulation, conditions of competition, and material injury by reason of cumulated subject imports.^{15 16}

¹² Supplemental CR/Supplemental PR at Table I-2.

¹³ SGRE’s argument regarding negligibility is addressed below.

¹⁴ 19 U.S.C. § 1677(7)(G)(iii).

¹⁵ See *Wind Towers Leading Determination*, USITC Pub. 5215.

¹⁶ The statute additionally instructs the Commission to consider the “magnitude of the dumping margin” in an antidumping proceeding as part of its consideration of the impact of imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final determination of sales at LTFV regarding Spain, Commerce calculated an antidumping duty margin of 73.0 percent for all producers/exporters. *Utility Scale Wind Towers From Spain: Final Determination of Sales at Less Than Fair Value*, 86 Fed. Reg. 33656, 33657 (June 25, 2021); Supplemental CR/Supplemental PR at Table I-1.

SGRE argued that in this investigation, the Commission was precluded from properly considering the magnitude of the dumping margin because Commerce improperly calculated that margin for all producers/exporters in Spain based on adverse facts available. See SGRE Prehearing Br. at 2-9. However, as SGRE acknowledged, the Commission is statutorily obligated to consider Commerce’s dumping margins. SGRE Prehearing Brief at 2. It is well-established that the statute requires the Commission to use the dumping margin calculated by Commerce and does not allow the Commission to calculate such margins or to decline to consider margins for individual companies. See *Polyethylene Terephthalate Film, Sheet, and Strip from Brazil, China, Thailand, and the United Arab Emirates*, Inv. Nos. 731-TA-1131-1134 (Final), USITC Pub. 4040 at 26 n.170 (Oct. 2008) (citing 19 U.S.C. §1677(35)(C) and *Algoma Steel Corp. v. United States*, 688 F. Supp. 639 (Ct. Int’l Trade 1988), *aff’d*, 865 F.2d 240 (Fed. Cir. 1989) (noting the bifurcation of authority between Commerce and the Commission). Because the Commission has no authority but to consider the margins as calculated by Commerce, we reject SGRE’s argument.

We have taken the magnitude of Commerce’s final dumping margin into account, and it does not require modification of the analysis in the *Wind Towers Leading Determination*. Specifically, the (Continued...)

Accordingly, we determine that the domestic industry producing wind towers is materially injured by reason of subject imports from Spain found by Commerce to be sold in the United States at LTFV.

dumping margin calculated by Commerce further supports our analysis of the price effects of subject imports, particularly the significant underselling and price suppression, as set out in the *Wind Towers Leading Determination*; in turn, the price effects found in the leading determination are especially probative to our assessment of the impact of subject imports on the domestic industry. *See Wind Towers Leading Determination*, USITC Pub. 5215 at 38-56.

For the same reason reviewed above, SGRE also argues that the Commission is precluded from properly assessing negligibility in this investigation. SGRE Prehearing Brief at 8-9. On the same basis discussed above, we also reject SGRE's argument on this matter. Commerce assigned a greater than *de minimis* estimated dumping margin for all producers/exporters in Spain. As such, the Commission calculated negligibility on the basis of all subject imports from Spain during the 12-month period immediately preceding the filing of the petition.

Part I: Introduction

Background

The antidumping and countervailing duty investigations result from petitions filed with the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (“USITC” or “Commission”) by the Wind Tower Coalition (Arcosa Wind Towers Inc. (“Arcosa”) (Dallas, Texas) and Broadwind Towers, Inc. (“Broadwind”) (Manitowoc, Wisconsin)) alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized imports of utility scale wind towers (“wind towers”) from India and Malaysia and less-than-fair-value (“LTFV”) imports of wind towers from India, Malaysia, and Spain. The following tabulation provides information relating to the background of these investigations.^{1 2}

¹ Pertinent *Federal Register* notices are referenced in appendix A and may be found at the Commission’s website (www.usitc.gov).

² Appendix B presents the Petitioners’ withdrawal of its request to appear at the Commission’s hearing. On June 4, 2021, counsel for the Wind Tower Trade Coalition filed its request to appear at the hearing. No other parties submitted a request to appear at the hearing. On June 7, 2021, counsel withdrew their request to appear at the hearing. Counsel indicated a willingness to submit written responses to any Commission questions in lieu of an actual hearing. Consequently, the public hearing in connection with these investigations was cancelled. 86 FR 31730, June 15, 2021.

Effective date	Action
September 30, 2020	Petitions filed with Commerce and the Commission; institution of Commission investigations (85 FR 63137, October 6, 2020)
October 7, 2020	Commerce's extension of initiation (85 FR 65028, October 14, 2020)
November 9, 2020	Commerce's notice of initiation of countervailing duty investigations (85 FR 73019, November 16, 2020) and antidumping duty investigations (85 FR 73023, November 16, 2020)
December 4, 2020	Commission's preliminary determinations (85 FR 79217, December 9, 2020)
December 28, 2020	Commerce's postponement of preliminary countervailing duty determinations regarding India and Malaysia (85 FR 84302 December 28, 2020)
March 12, 2021	Commerce's postponement of preliminary antidumping duty determinations regarding India and Malaysia (86 FR 14071, March 12, 2021)
March 25, 2021	Commerce's preliminary countervailing duty determinations regarding India and Malaysia (86 FR 15897, March 25, 2021; and 86 FR 15887, March 25, 2021); scheduling of final phase of Commission investigations (86 FR 20197, April 16, 2021)
April 2, 2021	Commerce's preliminary antidumping duty determination regarding Spain (86 FR 17354, April 2, 2021)
May 24, 2021	Commerce's preliminary antidumping duty determinations regarding India and Malaysia (86 FR 27828, May 24, 2021; and 86 FR 27829, May 24, 2021)
June 9, 2021	Commerce's final countervailing duty determinations regarding Malaysia (86 FR 30593, June 9, 2021)
June 10, 2021	Commission's hearing – Canceled (86 FR 31730, June 15, 2021)
June 25, 2021	Commerce's final antidumping duty determination regarding Spain (86 FR 33656, June 25, 2021); scheduling of final phase of Commission's antidumping investigation regarding Spain (86 FR 36305, July 9, 2021)
July 8, 2021	Commission's vote (Malaysia CVD)
July 26, 2021	Commission's views (Malaysia CVD)
July 27, 2021	Commission's vote (Spain AD)
August 9, 2021	Commission's views (Spain AD)
October 1, 2021	Scheduled date for Commerce's final antidumping duty determination regarding Malaysia
October 6, 2021	Scheduled date for Commerce's final countervailing duty and antidumping duty determinations regarding India

The information contained in this report is intended to be used in conjunction with data presented in the Commission’s report on Utility Scale Wind Towers from Malaysia, Investigation No. 701-TA-661 (Final), USITC Publication 5215, July 2021, and its corresponding confidential version contained in memoranda No. INV-TT-081.³ No new information except for Commerce’s final determination regarding wind towers from Spain and party comments thereon is included in the record for this proceeding.⁴

Nature and extent of sales at LTFV

On June 25, 2021 Commerce published a notice in the Federal Register of its final determination of sales at LTFV with respect to imports from Spain.⁵ Tables I-1 presents Commerce’s dumping margins with respect to imports of wind towers from Spain.

Table I-1
Wind towers: Commerce’s preliminary and final weighted-average LTFV margins with respect to imports from Spain

Exporter/producer	Final dumping margin (percent)
Vestas Eoilca S.A.U.	73.00
Acciona Windpower S.A.	73.00
Gamesa Energy Transmission	73.00
Haizea Wind Group	73.00
Kuzar Systems S.L.	73.00
Windar Renovables	73.00
All others	73.00

Source: 86 FR 33656, June 25, 2021.

³ Appendix C of this report reproduces summary data referenced in the Commission’s views.

⁴ Party comments were filed on behalf of the petitioners: the Wind Tower Trade Coalition, July 7, 2021.

⁵ 86 FR 33656, June 25, 2021.

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.⁶ Negligible imports are generally defined in the Act, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.⁷ Imports of wind towers from Spain found by Commerce to be sold at LTFV accounted for *** percent of total imports of wind towers by quantity during September 2019 through August 2020.⁸ Table I-2 presents the share of total U.S. imports, by quantity, attributable to India, Malaysia, Spain, and nonsubject sources during September 2019 through August 2020.

⁶ Sections 703(a)(1), 705(b)(1), 733(a)(1), and 735(b)(1) of the Act (19 U.S.C. §§ 1671b(a)(1), 1671d(b)(1), 1673b(a)(1), and 1673d(b)(1)).

⁷ Section 771 (24) of the Act (19 U.S.C § 1677(24)).

⁸ Compiled from data submitted in response to Commission questionnaires.

Table I-2
Wind towers: U.S. imports in the twelve month period preceding the filing of the petition,
September 2019 through August 2020

Quantity in units; share of quantity in percent

Source of imports	Quantity	Share of quantity
India	***	***
Malaysia	***	***
Spain	***	***
Subject sources	***	***
Nonsubject sources	***	***
All import sources	***	100.0

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

Reported U.S. imports of wind towers from Malaysia during September 2019 through August 2020 is likely ***. ***. Emails from ***, June 17, 2021; and ***, June 21, 2021.

APPENDIX A

***FEDERAL REGISTER* NOTICES**

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

Citation	Title	Link
85 FR 63137 October 6, 2020	<i>Utility Scale Wind Towers from India, Malaysia, and Spain; Institution of Anti-Dumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2020-10-06/pdf/2020-22026.pdf
85 FR 65028 October 14, 2020	<i>Notice of Extension of the Deadline for Determining the Adequacy of the Antidumping and Countervailing Duty Petitions: Utility Scale Wind Towers From India, Malaysia, and Spain</i>	https://www.govinfo.gov/content/pkg/FR-2020-10-14/pdf/2020-22681.pdf
85 FR 67372 October 22, 2020	<i>Utility Scale Wind Towers From India, Malaysia, and Spain Revised Schedule for the Subject Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2020-10-22/pdf/2020-23359.pdf
85 FR 73019 November 16, 2020	<i>Utility Scale Wind Towers From India and Malaysia: Initiation of Countervailing Duty Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2020-11-16/pdf/2020-25227.pdf
85 FR 73023 November 16, 2020	<i>Utility Scale Wind Towers From India, Malaysia, and Spain: Initiation of Less-Than-Fair-Value Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2020-11-16/pdf/2020-25226.pdf
85 FR 79217, December 9, 2020	<i>Utility Scale Wind Towers From India, Malaysia, and Spain</i>	https://www.govinfo.gov/content/pkg/FR-2020-12-09/pdf/2020-27010.pdf

Table continued on next page.

Citation	Title	Link
85 FR 84302 December 28, 2020	<i>Utility Scale Wind Towers from India and Malaysia: Postponement of Preliminary Determinations in the Countervailing Duty Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2020-12-28/pdf/2020-28595.pdf
86 FR 14071, March 12, 2021	<i>Utility Scale Wind Towers From India and Malaysia: Postponement of Preliminary Determinations in the Less-Than-Fair-Value Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-12/pdf/2021-05187.pdf
86 FR 15897, March 25, 2021	<i>Utility Scale Wind Towers From India: Preliminary Affirmative Countervailing Duty Determination, and Alignment of Final Determination With Final Antidumping Duty Determination</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-25/pdf/2021-06196.pdf
86 FR 15887, March 25, 2021	<i>Utility Scale Wind Towers From Malaysia: Preliminary Affirmative Countervailing Duty Determination</i>	https://www.govinfo.gov/content/pkg/FR-2021-03-25/pdf/2021-06197.pdf
86 FR 17354, April 2, 2021	<i>Utility Scale Wind Towers From Spain: Preliminary Affirmative Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2021-04-02/pdf/2021-06869.pdf
86 FR 20197, April 16, 2021	<i>Utility Scale Wind Towers From India, Malaysia, and Spain; Scheduling of the Final Phase of Countervailing Duty and Antidumping Duty Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2021-04-16/pdf/2021-07900.pdf

Table continued on next page.

Citation	Title	Link
86 FR 27828, May 24, 2021	<i>Utility Scale Wind Towers From Malaysia: Preliminary Determination of Sales at Not Less Than Fair Value and Postponement of Final Determination</i>	https://www.govinfo.gov/content/pkg/FR-2021-05-24/pdf/2021-10918.pdf
86 FR 27829, May 24, 2021	<i>Utility Scale Wind Towers From India: Preliminary Affirmative Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2021-05-24/pdf/2021-10913.pdf
86 FR 30593, June 9, 2021	<i>Utility Scale Wind Towers From Malaysia: Final Affirmative Countervailing Duty Determination</i>	https://www.govinfo.gov/content/pkg/FR-2021-06-09/pdf/2021-12024.pdf
86 FR 31730, June 15, 2021	<i>Cancellation of Hearing for Final Phase Countervailing Duty and Antidumping Duty Investigations; Utility Scale Wind Towers From India, Malaysia, and Spain</i>	https://www.govinfo.gov/content/pkg/FR-2021-06-15/pdf/2021-12562.pdf
86 FR 33656, June 25, 2021	<i>Utility Scale Wind Towers From Spain: Final Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2021-06-25/pdf/2021-13547.pdf
86 FR 36305, July 9, 2021	<i>Utility Scale Wind Towers From Spain; Scheduling of the Final Phase of Antidumping Duty Investigation</i>	https://www.govinfo.gov/content/pkg/FR-2021-07-09/pdf/2021-14648.pdf

APPENDIX B

PETITIONERS' WITHDRAWAL OF REQUEST TO APPEAR AT THE HEARING



June 7, 2021

USITC Inv. Nos. 701-TA-660-661 and 731-TA-1543-1545 (Final)

PUBLIC DOCUMENT

The Honorable Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street, SW
Washington, DC 20436

Re: *Utility Scale Wind Towers from India, Malaysia, and Spain*: Withdrawal of
Request to Appear at Hearing

Dear Secretary Barton:

On behalf of the Wind Tower Trade Coalition, and given that those in opposition have not requested to appear at the hearing, we hereby withdraw our request to appear at and participate in the final phase hearing in the above-referenced investigations, scheduled to be held by the U.S. International Trade Commission on Thursday, June 10, 2021.¹

¹ Letter from Wiley Rein LLP to Sec’y of the Commission, re: *Utility Scale Wind Towers From India, Malaysia, and Spain: Request to Appear at Hearing* (June 4, 2021).

Should you have any questions regarding this submission, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/ Daniel B. Pickard

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CERTIFICATE OF SERVICE

PUBLIC SERVICE

Utility Scale Wind Towers from India, Malaysia, and Spain

Inv. Nos. 701-TA-660-661 and 731-TA-1543-1545

Final

I certify that a copy of this public submission was served on the following parties, via electronic service, on June 7, 2021.

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APPENDIX C
SUMMARY DATA

Table C-1: Wind towers: Summary data concerning the total U.S. market.....	C-3
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Table C-3: Wind towers: Summary data concerning the total U.S. market excluding U.S. producer ***	C-8

Total market

Table C-1

Wind towers: Summary data concerning the U.S. total market, 2018-20

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

	Reported data			Period changes		
	2018	2019	2020	2018-20	2018-19	2019-20
U.S. total market consumption quantity:						
Amount.....	3,762	5,102	5,156	▲37.1	▲35.6	▲1.1
Producers' share (fn1).....	***	***	***	▼***	▼***	▼***
Importers' share (fn1):						
India.....	***	***	***	▲***	▲***	▲***
Malaysia.....	***	***	***	▲***	▲***	▲***
Spain.....	***	***	***	▲***	▼***	▲***
Subject sources.....	***	***	***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	▼***	▲***	▼***
All import sources.....	***	***	***	▲***	▲***	▲***
U.S. total market consumption value:						
Amount.....	1,118,778	1,577,867	1,762,512	▲57.5	▲41.0	▲11.7
Producers' share (fn1).....	***	***	***	▼***	▼***	▼***
Importers' share (fn1):						
India.....	***	***	***	▲***	▲***	▲***
Malaysia.....	***	***	***	▲***	▲***	▲***
Spain.....	***	***	***	▲***	▼***	▲***
Subject sources.....	***	***	***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	▲***	▲***	▼***
All import sources.....	***	***	***	▲***	▲***	▲***
U.S. importers' U.S. shipments of imports from:						
India:						
Quantity.....	***	***	***	▲***	▲***	▲***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	***
Malaysia:						
Quantity.....	***	***	***	▲***	▲***	▲***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	***
Spain:						
Quantity.....	***	***	***	▲***	▲***	▲***
Value.....	***	***	***	▲***	▼***	▲***
Unit value.....	***	***	***	▼***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	***
Subject sources:						
Quantity.....	***	***	***	▲***	▲***	▲***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▼***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	***

Table continued on next page.

Table C-1 continued

Wind towers: Summary data concerning the U.S. total market, 2018-20

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

	Reported data			Period changes		
	Calendar year			Comparison years		
	2018	2019	2020	2018-20	2018-19	2019-20
U.S. importers' U.S. shipments of imports from--Continued:						
Nonsubject sources:						
Quantity.....	***	***	***	▲***	▲***	▼***
Value.....	***	***	***	▲***	▲***	▼***
Unit value.....	***	***	***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	▼***	▼***	▼***
All import sources:						
Quantity.....	1,064	2,138	2,412	▲126.7	▲100.9	▲12.8
Value.....	259,145	582,761	807,957	▲211.8	▲124.9	▲38.6
Unit value.....	\$243,557	\$272,573	\$334,974	▲37.5	▲11.9	▲22.9
Ending inventory quantity.....	***	***	***	▼***	▼***	▼***
U.S. producers':						
Average capacity quantity.....	3,609	3,687	3,682	▲2.0	▲2.2	▼(0.1)
Production quantity.....	2,672	2,895	2,854	▲6.8	▲8.3	▼(1.4)
Capacity utilization (fn1).....	74.0	78.5	77.5	▲3.5	▲4.5	▼(1.0)
U.S. shipments:						
Quantity.....	2,698	2,964	2,744	▲1.7	▲9.9	▼(7.4)
Value.....	859,633	995,106	954,555	▲11.0	▲15.8	▼(4.1)
Unit value.....	\$318,619	\$335,731	\$347,870	▲9.2	▲5.4	▲3.6
Export shipments:						
Quantity.....	---	---	---	---	---	---
Value.....	---	---	---	---	---	---
Unit value.....	---	---	---	---	---	---
Ending inventory quantity.....	***	***	***	▲***	▼***	▲***
Inventories/total shipments (fn1).....	***	***	***	▲***	▼***	▲***
Production workers.....	2,051	2,145	2,205	▲7.5	▲4.6	▲2.8
Hours worked (1,000s).....	4,276	4,571	4,713	▲10.2	▲6.9	▲3.1
Wages paid (\$1,000).....	156,739	160,145	169,516	▲8.2	▲2.2	▲5.9
Hourly wages (dollars per hour).....	\$36.66	\$35.04	\$35.97	▼(1.9)	▼(4.4)	▲2.7
Productivity (units per 10,000 hours).....	6.2	6.3	6.1	▼(3.1)	▲1.4	▼(4.4)
Unit labor costs.....	\$58,660	\$55,318	\$59,396	▲1.3	▼(5.7)	▲7.4

Table continued on next page.

Table C-1 continued

Wind towers: Summary data concerning the U.S. total market, 2018-20

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

	Reported data			Period changes		
	Calendar year			Comparison years		
	2018	2019	2020	2018-20	2018-19	2019-20
U.S. producers'--Continued:						
Net sales:						
Quantity.....	2,698	2,964	2,744	▲ 1.7	▲ 9.9	▼(7.4)
Value.....	858,373	995,106	954,041	▲ 11.1	▲ 15.9	▼(4.1)
Unit value.....	\$318,152	\$335,731	\$347,683	▲ 9.3	▲ 5.5	▲ 3.6
Cost of goods sold (COGS).....	788,707	904,581	882,120	▲ 11.8	▲ 14.7	▼(2.5)
Gross profit or (loss) (fn2).....	69,666	90,525	71,921	▲ 3.2	▲ 29.9	▼(20.6)
SG&A expenses.....	25,339	28,142	29,161	▲ 15.1	▲ 11.1	▲ 3.6
Operating income or (loss) (fn2).....	44,327	62,383	42,760	▼(3.5)	▲ 40.7	▼(31.5)
Net income or (loss) (fn2).....	50,272	57,087	44,387	▼(11.7)	▲ 13.6	▼(22.2)
Unit COGS.....	\$292,330	\$305,189	\$321,472	▲ 10.0	▲ 4.4	▲ 5.3
Unit SG&A expenses.....	\$9,392	\$9,495	\$10,627	▲ 13.2	▲ 1.1	▲ 11.9
Unit operating income or (loss) (fn2).....	\$16,430	\$21,047	\$15,583	▼(5.2)	▲ 28.1	▼(26.0)
Unit net income or (loss) (fn2).....	\$18,633	\$19,260	\$16,176	▼(13.2)	▲ 3.4	▼(16.0)
COGS/sales (fn1).....	91.9	90.9	92.5	▲ 0.6	▼(1.0)	▲ 1.6
Operating income or (loss)/sales (fn1).....	5.2	6.3	4.5	▼(0.7)	▲ 1.1	▼(1.8)
Net income or (loss)/sales (fn1).....	5.9	5.7	4.7	▼(1.2)	▼(0.1)	▼(1.1)
Capital expenditures.....	26,707	17,312	16,969	▼(36.5)	▼(35.2)	▼(2.0)
Research and development expenses.....	***	***	***	▼***	▲***	▼***
Net assets.....	433,347	335,123	342,148	▼(21.0)	▼(22.7)	▲ 2.1

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "---". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

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

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

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

Merchant market

Table C-2

Wind towers: Summary data concerning the U.S. merchant market, 2018-20

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

	Reported data			Period changes		
	Calendar year			Comparison years		
	2018	2019	2020	2018-20	2018-19	2019-20
U.S. merchant market consumption quantity:						
Amount.....	***	***	***	▲ ***	▲ ***	▲ ***
Producers' share (fn1).....	***	***	***	▼ ***	▼ ***	▼ ***
Importers' share (fn1):						
India.....	***	***	***	▲ ***	▲ ***	▲ ***
Malaysia.....	***	***	***	▲ ***	▲ ***	▲ ***
Spain.....	***	***	***	▲ ***	▼ ***	▲ ***
Subject sources.....	***	***	***	▲ ***	▲ ***	▲ ***
Nonsubject sources.....	***	***	***	▼ ***	▲ ***	▼ ***
All import sources.....	***	***	***	▲ ***	▲ ***	▲ ***
U.S. merchant market consumption value:						
Amount.....	***	***	***	▲ ***	▲ ***	▲ ***
Producers' share (fn1).....	***	***	***	▼ ***	▼ ***	▼ ***
Importers' share (fn1):						
India.....	***	***	***	▲ ***	▲ ***	▲ ***
Malaysia.....	***	***	***	▲ ***	▲ ***	▲ ***
Spain.....	***	***	***	▲ ***	▼ ***	▲ ***
Subject sources.....	***	***	***	▲ ***	▲ ***	▲ ***
Nonsubject sources.....	***	***	***	▼ ***	▲ ***	▼ ***
All import sources.....	***	***	***	▲ ***	▲ ***	▲ ***
U.S. importers' U.S. shipments of imports from:						
India:						
Quantity.....	***	***	***	▲ ***	▲ ***	▲ ***
Value.....	***	***	***	▲ ***	▲ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▼ ***
Ending inventory quantity.....	***	***	***	***	***	***
Malaysia:						
Quantity.....	***	***	***	▲ ***	▲ ***	▲ ***
Value.....	***	***	***	▲ ***	▲ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▲ ***
Ending inventory quantity.....	***	***	***	***	***	***
Spain:						
Quantity.....	***	***	***	▲ ***	▲ ***	▲ ***
Value.....	***	***	***	▲ ***	▼ ***	▲ ***
Unit value.....	***	***	***	▼ ***	▼ ***	▼ ***
Ending inventory quantity.....	***	***	***	***	***	***
Subject sources:						
Quantity.....	***	***	***	▲ ***	▲ ***	▲ ***
Value.....	***	***	***	▲ ***	▲ ***	▲ ***
Unit value.....	***	***	***	▼ ***	▼ ***	▲ ***
Ending inventory quantity.....	***	***	***	***	***	***

Table continued on next page.

Table C-2 continued

Wind towers: Summary data concerning the U.S. merchant market, 2018-20

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

	Reported data			Period changes		
	2018	2019	2020	2018-20	2018-19	2019-20
U.S. importers' U.S. shipments of imports from--Continued:						
Nonsubject sources:						
Quantity.....	***	***	***	▲***	▲***	▼***
Value.....	***	***	***	▲***	▲***	▼***
Unit value.....	***	***	***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	▼***	▼***	▼***
All import sources:						
Quantity.....	***	***	***	▲***	▲***	▲***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	▼***	▼***	▼***
U.S. producers':						
Commercial U.S. shipments:						
Quantity.....	***	***	***	▲***	▲***	▼***
Value.....	***	***	***	▲***	▲***	▼***
Unit value.....	***	***	***	▲***	▲***	▲***
Commercial sales:						
Quantity.....	***	***	***	▲***	▲***	▼***
Value.....	***	***	***	▲***	▲***	▼***
Unit value.....	***	***	***	▲***	▲***	▲***
Cost of goods sold (COGS).....	***	***	***	▲***	▲***	▼***
Gross profit or (loss) (fn2).....	***	***	***	▲***	▲***	▲***
SG&A expenses.....	***	***	***	▲***	▲***	▲***
Operating income or (loss) (fn2).....	***	***	***	▲***	▲***	▲***
Net income or (loss) (fn2).....	***	***	***	▲***	▲***	▲***
Unit COGS.....	***	***	***	▲***	▲***	▼***
Unit SG&A expenses.....	***	***	***	▲***	▼***	▲***
Unit operating income or (loss) (fn2).....	***	***	***	▲***	▲***	▲***
Unit net income or (loss) (fn2).....	***	***	***	▲***	▼***	▲***
COGS/sales (fn1).....	***	***	***	▼***	▲***	▼***
Operating income or (loss)/sales (fn1).....	***	***	***	▲***	▲***	▲***
Net income or (loss)/sales (fn1).....	***	***	***	▼***	▼***	▲***

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "---". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

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

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

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

Related party exclusion

Table C-3

Wind towers: Summary data concerning the U.S. total market excluding one U.S. producer *, 2018-20**

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

	Reported data			Period changes		
	2018	2019	2020	2018-20	2018-19	2019-20
U.S. total market consumption quantity:						
Amount.....	***	***	***	▲ ***	▲ ***	▲ ***
Producers' share (fn1):						
Included producers.....	***	***	***	▼ ***	▼ ***	▼ ***
Excluded producers.....	***	***	***	▼ ***	▼ ***	▼ ***
All producers.....	***	***	***	▼ ***	▼ ***	▼ ***
Importers' share (fn1):						
India.....	***	***	***	▲ ***	▲ ***	▲ ***
Malaysia.....	***	***	***	▲ ***	▲ ***	▲ ***
Spain.....	***	***	***	▲ ***	▼ ***	▲ ***
Subject sources.....	***	***	***	▲ ***	▲ ***	▲ ***
Nonsubject sources.....	***	***	***	▼ ***	▲ ***	▼ ***
All import sources.....	***	***	***	▲ ***	▲ ***	▲ ***
U.S. total market consumption value:						
Amount.....	***	***	***	▲ ***	▲ ***	▲ ***
Producers' share (fn1):						
Included producers.....	***	***	***	▼ ***	▼ ***	▼ ***
Excluded producers.....	***	***	***	▼ ***	▼ ***	▼ ***
All producers.....	***	***	***	▼ ***	▼ ***	▼ ***
Importers' share (fn1):						
India.....	***	***	***	▲ ***	▲ ***	▲ ***
Malaysia.....	***	***	***	▲ ***	▲ ***	▲ ***
Spain.....	***	***	***	▲ ***	▼ ***	▲ ***
Subject sources.....	***	***	***	▲ ***	▲ ***	▲ ***
Nonsubject sources.....	***	***	***	▲ ***	▲ ***	▼ ***
All import sources.....	***	***	***	▲ ***	▲ ***	▲ ***
U.S. importers' U.S. shipments of imports from:						
India:						
Quantity.....	***	***	***	▲ ***	▲ ***	▲ ***
Value.....	***	***	***	▲ ***	▲ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▼ ***
Ending inventory quantity.....	***	***	***	***	***	***
Malaysia:						
Quantity.....	***	***	***	▲ ***	▲ ***	▲ ***
Value.....	***	***	***	▲ ***	▲ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▲ ***
Ending inventory quantity.....	***	***	***	***	***	***
Spain:						
Quantity.....	***	***	***	▲ ***	▲ ***	▲ ***
Value.....	***	***	***	▲ ***	▼ ***	▲ ***
Unit value.....	***	***	***	▼ ***	▼ ***	▼ ***
Ending inventory quantity.....	***	***	***	***	***	***

Table continued on next page.

Table C-3 continued

Wind towers: Summary data concerning the U.S. total market excluding one U.S. producer *, 2018-20**

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

	Reported data			Period changes		
	Calendar year			Comparison years		
	2018	2019	2020	2018-20	2018-19	2019-20
U.S. importers' U.S. shipments of imports from--Continued:						
Subject sources:						
Quantity.....	***	***	***	▲***	▲***	▲***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▼***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	***
Nonsubject sources:						
Quantity.....	***	***	***	▲***	▲***	▼***
Value.....	***	***	***	▲***	▲***	▼***
Unit value.....	***	***	***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	▼***	▼***	▼***
All import sources:						
Quantity.....	***	***	***	▲***	▲***	▲***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	▼***	▼***	▼***
Included U.S. producers':						
Average capacity quantity.....	***	***	***	▲***	▲***	▲***
Production quantity.....	***	***	***	▲***	▲***	▲***
Capacity utilization (fn1).....	***	***	***	▲***	▲***	▼***
U.S. shipments:						
Quantity.....	***	***	***	▲***	▲***	▼***
Value.....	***	***	***	▲***	▲***	▼***
Unit value.....	***	***	***	▲***	▲***	▲***
Export shipments:						
Quantity.....	***	***	***	***	***	***
Value.....	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	▼***	▼***	▲***
Inventories/total shipments (fn1).....	***	***	***	▼***	▼***	▲***
Production workers.....	***	***	***	▲***	▲***	▲***
Hours worked (1,000s).....	***	***	***	▲***	▲***	▲***
Wages paid (\$1,000).....	***	***	***	▲***	▲***	▲***
Hourly wages (dollars per hour).....	***	***	***	▼***	▼***	▲***
Productivity (units per 10,000 hours).....	***	***	***	▼***	▼***	▼***
Unit labor costs.....	***	***	***	▲***	▼***	▲***

Table continued on next page.

Table C-3 continued

Wind towers: Summary data concerning the U.S. total market excluding one U.S. producer *, 2018-20**

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

	Reported data			Period changes		
	Calendar year			Comparison years		
	2018	2019	2020	2018-20	2018-19	2019-20
Included U.S. producers'--Continued:						
Net sales:						
Quantity.....	***	***	***	▲***	▲***	▼***
Value.....	***	***	***	▲***	▲***	▼***
Unit value.....	***	***	***	▲***	▲***	▲***
Cost of goods sold (COGS).....	***	***	***	▲***	▲***	▼***
Gross profit or (loss) (fn2).....	***	***	***	▲***	▲***	▲***
SG&A expenses.....	***	***	***	▲***	▲***	▲***
Operating income or (loss) (fn2).....	***	***	***	▲***	▲***	▲***
Net income or (loss) (fn2).....	***	***	***	▲***	▲***	▲***
Unit COGS.....	***	***	***	▲***	▲***	▼***
Unit SG&A expenses.....	***	***	***	▲***	▼***	▲***
Unit operating income or (loss) (fn2).....	***	***	***	▲***	▲***	▲***
Unit net income or (loss) (fn2).....	***	***	***	▲***	▼***	▲***
COGS/sales (fn1).....	***	***	***	▼***	▲***	▼***
Operating income or (loss)/sales (fn1).....	***	***	***	▲***	▲***	▲***
Net income or (loss)/sales (fn1).....	***	***	***	▼***	▼***	▲***
Capital expenditures.....	***	***	***	▼***	▼***	▲***
Research and development expenses.....	***	***	***	▼***	▲***	▼***
Net assets.....	***	***	***	▼***	▼***	▲***

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "---". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

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

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

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

