

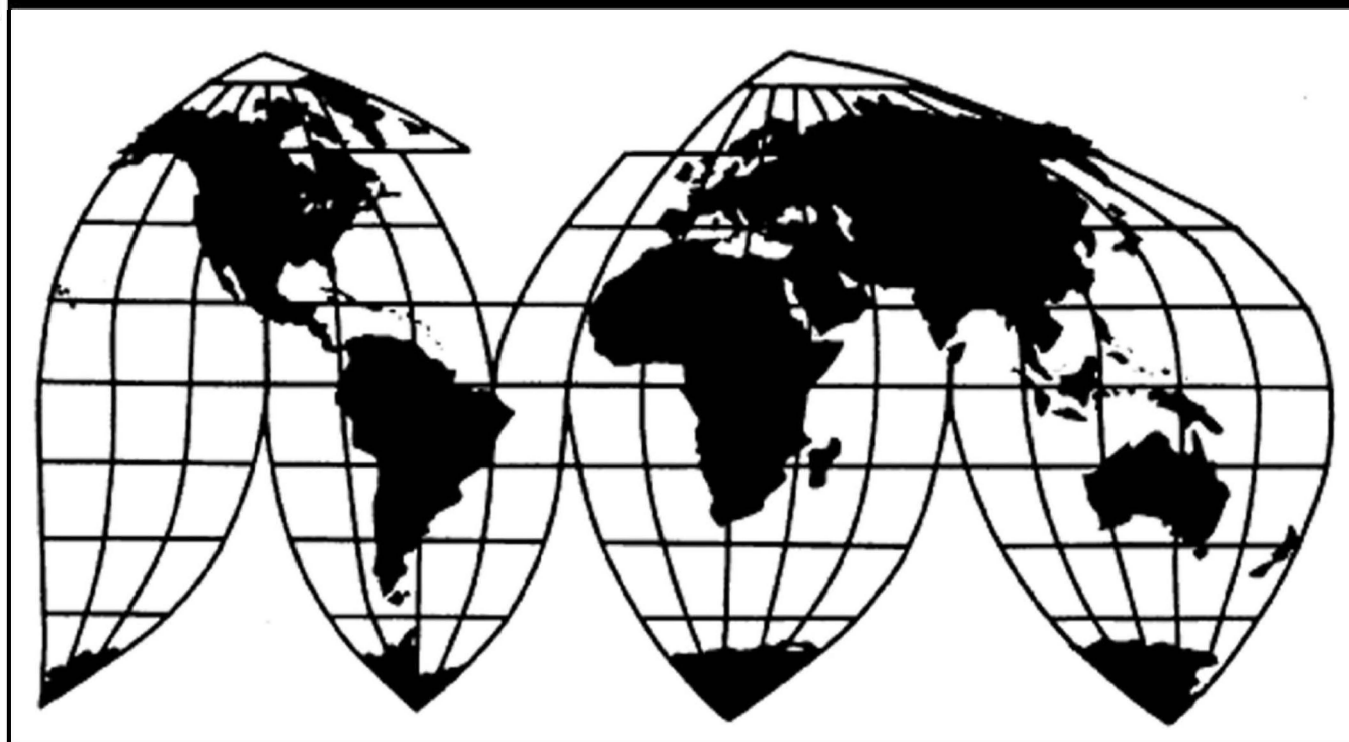
Utility Scale Wind Towers from India and Malaysia

Investigation Nos. 701-TA-660 and
731-TA-1543-1544 (Final)

Publication 5247

November 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Note.—Information that would reveal confidential operations of individual concerns may not be published.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 Nos. 701-TA-660 and 731-TA-1543-1544 (Final)

Utility Scale Wind Towers from India and Malaysia

DETERMINATIONS

On the basis of the record¹ developed in the subject investigations, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that an industry in the United States is materially injured by reason of imports of utility scale wind towers (“wind towers”) from India and Malaysia, 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”) and to be subsidized by the government of India.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 56890, October 13, 2021; 86 FR 56894, October 13, 2021; and 86 FR 56896, October 13, 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 (86 FR 15887, March 25, 2021) with its antidumping duty investigation regarding imports from Malaysia, its antidumping duty investigation regarding imports from Spain, or its countervailing and antidumping duty investigations regarding imports from India. 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). On August 9, 2021, the Commission issued a final affirmative determination in its antidumping duty investigation of wind towers from Spain (86 FR 44748, August 13, 2021). Following notification of final determinations by Commerce that imports of wind towers from India were being subsidized within the meaning of section 703(b) of the Act (19 U.S.C. 1671b(b)) and that imports of wind towers from India and Malaysia 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 countervailing duty investigation regarding India and antidumping duty investigations regarding India and Malaysia was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* of October 20, 2021 (86 FR 58098).

Views of the Commission

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

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 when Commerce did not align its countervailing duty investigation regarding imports from Malaysia² with: 1) its antidumping duty investigation regarding imports from Malaysia;³ 2) its antidumping duty investigation regarding imports from Spain;⁴ and 3) its countervailing and antidumping duty investigations regarding imports from India.⁵ Commerce published its final countervailing duty determination regarding Malaysia on June 9, 2021.⁶ Commerce subsequently published its final affirmative determination regarding LTFV imports of wind

¹ The Coalition consists of two domestic producers of wind towers, Arcosa Wind Towers Inc. and Broadwind Towers, Inc. Confidential Report, INV-TT-128 (Nov. 8, 2021) (“Supplemental CR”) at I-1; Public Report (“Supplemental PR”) at I-1.

² *Utility Scale Wind Towers from Malaysia: Preliminary Affirmative Countervailing Duty Determination*, 86 Fed. Reg. 15887 (March 25, 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 this investigation with any of the other investigations.

³ *Utility Scale Wind Towers from Malaysia: Preliminary Determination of Sales at Not Less Than Fair Value and Postponement of Final Determination*, 86 Fed. Reg. 27828 (May 24, 2021).

⁴ *Utility Scale Wind Towers From Spain: Preliminary Affirmative Determination of Sales at Less Than Fair Value*, 86 Fed. Reg. 17354 (Apr. 2, 2021).

⁵ *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 at Less Than Fair Value*, 86 Fed. Reg. 38274 (July 20, 2021). Commerce aligned its countervailing duty investigation regarding imports from India with that of its corresponding postponed antidumping duty investigation.

⁶ *Utility Scale Wind Towers From Malaysia: Final Affirmative Countervailing Duty Determination*, 86 Fed. Reg. 30593 (June 9, 2021).

towers from Spain on June 25, 2021.⁷ Lastly, Commerce published its final countervailing duty determination regarding India and its final antidumping duty determinations regarding India and Malaysia on October 13, 2021.⁸

This sequence necessitated, first, a final determination by the Commission in its countervailing duty investigation regarding Malaysia (the “leading investigation”),⁹ followed, second, by a final determination regarding subject imports from Spain.¹⁰ Third and finally, the Commission must now make its determinations in the antidumping and countervailing duty investigations on wind towers from India and the antidumping duty investigation on wind towers from Malaysia (collectively, the “trailing India and Malaysia investigations”). 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 determinations regarding the trailing India and Malaysia investigations and final comments concerning these determinations have been added to the record.^{11 12}

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.¹³ The statute further provides that subject imports from a single country which comprise less than 3 percent of total such imports of the product may not be considered negligible if there are several countries subject to investigation with negligible imports and the

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

⁸ See *Utility Scale Wind Towers From India: Final Affirmative Countervailing Duty Determination*, 86 Fed. Reg. 56896 (Oct. 13, 2021); *Utility Wind Towers From India: Final Affirmative Determination of Sales at Less than Fair Value*, 86 Fed. Reg. 56890 (Oct. 2021); and *Utility Scale Wind Towers from Malaysia: Final Affirmative Determination of Sales at Less than Fair Value*, 86 Fed. Reg. 56894 (Oct. 13, 2021).

⁹ See *Utility Scale Wind Towers From Malaysia*, 701-TA-661 (Final), USITC Pub. 5215 (July 2021) (“*Wind Towers Leading Determination*”).

¹⁰ See *Utility Scale Wind Towers From Spain*, 731-TA-1545 (Final), USITC Pub. 5219 (Aug. 2021).

¹¹ See 19 U.S.C. § 1677(7)(G)(iii).

¹² Petitioner filed supplemental final comments concerning these determinations. Petitioner’s Supplemental Final Comments, EDIS Doc. 755020 (Oct. 25, 2021) (“*Supplemental Final Comments*”). No supplemental final comments were received from any respondent.

¹³ 19 U.S.C. § 1677(24)(A)(i).

sum of such imports from all those countries collectively accounts for more than 7 percent of the volume of all such merchandise imported into the United States.¹⁴ In the case of countervailing duty investigations involving developing countries (as designated by the United States Trade Representative (“USTR”)), the statute indicates that the negligibility limits are 4 percent and 9 percent, rather than 3 percent and 7 percent.¹⁵

During the 12-month period prior to the filing of the petitions (September 2019 through August 2020), imports of wind towers from India subject to the antidumping and countervailing duty investigations accounted for *** percent of total imports.¹⁶ Imports of wind towers from Malaysia subject to the antidumping duty investigation accounted for *** percent of total imports of wind towers during the same period.¹⁷ Accordingly, we find that subject imports from India and Malaysia are not negligible.

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 determinations in the trailing India and Malaysia investigations on the basis of the same record as that in the leading investigation, except to the extent discussed above.¹⁸ Therefore, in these investigations, we adopt the findings and analyses from our determination and views in the leading investigation with respect to the issues of domestic like product, domestic industry, cumulation, conditions of competition, and material injury by reason of cumulated subject imports.^{19 20}

¹⁴ 19 U.S.C. § 1677(24)(A)(ii).

¹⁵ The USTR has not deemed India a developing country. *Designations of Developing and Least Developed Countries Under the Countervailing Duty Law*, 85 Fed. Reg. 7613 (Feb. 10, 2020).

¹⁶ Supplemental CR/Supplemental PR at I-5 & Table I-5.

¹⁷ Supplemental CR/Supplemental PR, at I-5 & Table I-5.

¹⁸ 19 U.S.C. § 1677(7)(G)(iii).

¹⁹ *See Wind Towers Leading Determination*, USITC Pub. 5215.

²⁰ 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 antidumping duty determination with respect to subject imports from India, Commerce found estimated weighted-average dumping margins of 54.03 percent for Vestas Wind Technology India Private Limited, Acciona Wind Power India Pvt. Ltd., Nordex India Pvt. Ltd., Prommada Hindustan Private Ltd., Vinayaka Energy Tek, Zeeco India Pvt. Ltd., and all other Indian producers/exporters of wind towers. *Utility Scale Wind Towers From India: Final Affirmative Determination of Sales at Less Than Fair Value*, 86 Fed Reg. 56890 (Oct. 13, 2021); Supplemental CR/Supplemental PR at Table I-3. In its final antidumping duty determination with respect to subject imports from Malaysia, Commerce found estimated weighted-average dumping margins of 3.20 percent (Continued...)

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

for CS Wind Corporation/CS Wind Malaysia Sdn Bhd and all other Malaysian producers/exports of wind towers. *Utility Scale Wind Towers From Malaysia: Final Affirmative Determination of Sales at Less Than Fair Value*, 86 Fed Reg. 56894 (Oct. 13, 2021); Supplemental CR/Supplemental PR at Table I-3.

We have taken the magnitude of Commerce's final dumping margins into account, and they do not require modification of the analysis in the *Wind Towers Leading Determination*. Specifically, the dumping margins 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.

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. Table I-1 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.

**Table I-1:
Wind towers: Information relating to the background and schedule of this proceeding**

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 13, 2021	Commerce's final countervailing duty determination regarding India and final antidumping duty determination regarding India and Malaysia (86 FR 56896, October 13, 2021; 86 FR 56890, October 13, 2021; and 86 FR 56894, October 13, 2021); scheduling of final phase of Commission's countervailing duty investigation regarding India and antidumping duty investigations regarding India and Malaysia (86 FR 58098, October 20, 2021)
November 16, 2021	Commission's vote (India AD/CVD and Malaysia AD)
November 29, 2021	Commission's views (India AD/CVD and Malaysia AD)

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 India and Malaysia and party comments thereon is included in the record for this proceeding.⁴

Nature and extent of subsidies and sales at LTFV

Subsidies

On October 13, 2021 Commerce published a notice in the Federal Register of its final determination of countervailable subsidies for producers and exporters of wind towers from India.⁵ Table I-2 presents Commerce’s findings of subsidization of wind towers in India.

Table I-2
Wind towers: Commerce’s final subsidy determination with respect to imports from India

Entity	Final countervailable subsidy rate (percent)
Vestas Wind Technology India Private Limited	2.25
Naiks Brass & Iron Works	397.70
Nordex India Pvt	397.70
Prommada Hindustan	397.70
Suzlon Energy	397.70
Vinayaka Energy Tek	397.70
Wish Energy Solutions Pvt Ltd	397.70
Zeeco India Pvt. Ltd	397.70
All others	2.25

Source: 86 FR 56896, October 13, 2021.

Note: Rates for all individually listed entities except Vestas Wind Technology India Private Limited are based on adverse facts available.

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, October 25, 2021.

⁵ 86 FR 56896, October 13, 2021.

Sales at LTFV

On October 13, 2021 Commerce published a notice in the Federal Register of its final determination of sales at LTFV with respect to imports from India and Malaysia.⁶ Table I-3 and table I-4 present Commerce's dumping margins with respect to imports of wind towers from India and Malaysia.

Table I-3

Wind towers: Commerce's final weighted-average LTFV margins with respect to imports from India

Exporter/producer	Final dumping margin (percent)
Vestas Wind Technology India Private Limited	54.03
Acciona Wind Power India Pvt. Ltd	54.03
Nordex India Pvt. Ltd	54.03
Prommada Hindustan Private Ltd	54.03
Vinayaka Energy Tek	54.03
Zeeco India Pvt. Ltd	54.03
All others	54.03

Source: 86 FR 56890, October 13, 2021.

Table I-4

Wind towers: Commerce's final weighted-average LTFV margins with respect to imports from Malaysia

Exporter/producer	Final dumping margin (percent)
CS Wind Corporation/CS Wind Malaysia Sdn Bhd	3.20
All others	3.20

Source: 86 FR 56894, October 13, 2021.

⁶ 86 FR 56890; and 86 FR 56894, October 13, 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.⁷ Negligible imports are generally defined in the Act, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.⁸ Imports of wind towers from India and Malaysia found by Commerce to be sold at LTFV and subsidized by the government of India accounted for *** percent and *** percent of total imports of wind towers by quantity during September 2019 through August 2020, respectively.⁹ Table I-5 presents the share of total U.S. imports, by quantity, attributable to India, Malaysia, Spain, and nonsubject sources during September 2019 through August 2020.

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

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

⁹ Compiled from data submitted in response to Commission questionnaires.

Table I-5
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.

Note: 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.

Note: These calculations are based on Commerce's final AD and CVD determinations for Wind Towers from India (86 FR 56890, and 86 FR 56896, October 13, 2021) and AD determination for Wind Towers from Malaysia (86 FR 56894, October 13, 2021), and are unchanged from the calculations in the leading investigations. The volume of imports for Wind Towers from India are the same in both Commerce's final AD and CVD determinations.

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.

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.

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 Anti-Dumping 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 Anti-Dumping Duty Investigation</i>	https://www.govinfo.gov/content/pkg/FR-2021-07-09/pdf/2021-14648.pdf
86 FR 44748, August 13, 2021	<i>Utility Scale Wind Towers From Spain; Determination</i>	https://www.govinfo.gov/content/pkg/FR-2021-08-13/pdf/2021-17309.pdf
86 FR 56896, October 13, 2021	<i>Utility Scale Wind Towers From India: Final Affirmative Countervailing Duty Determination</i>	https://www.govinfo.gov/content/pkg/FR-2021-10-13/pdf/2021-22246.pdf
86 FR 56890, October 13, 2021	<i>Utility Scale Wind Towers From India: Final Affirmative Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2021-10-13/pdf/2021-22245.pdf

Table continued.

Citation	Title	Link
86 FR 56894, October 13, 2021	<i>Utility Scale Wind Towers From Malaysia: Final Affirmative Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2021-10-13/pdf/2021-22247.pdf
86 FR 58098, October 20, 2021	<i>Utility Scale Wind Towers From India and Malaysia; Scheduling of the Final Phase of Countervailing and Antidumping Duty Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2021-10-20/pdf/2021-22804.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,

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PUBLIC SERVICE

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Final

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APPENDIX C
SUMMARY DATA

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

Table C-2: Wind towers: Summary data concerning the merchant U.S. market..... C-6

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

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