

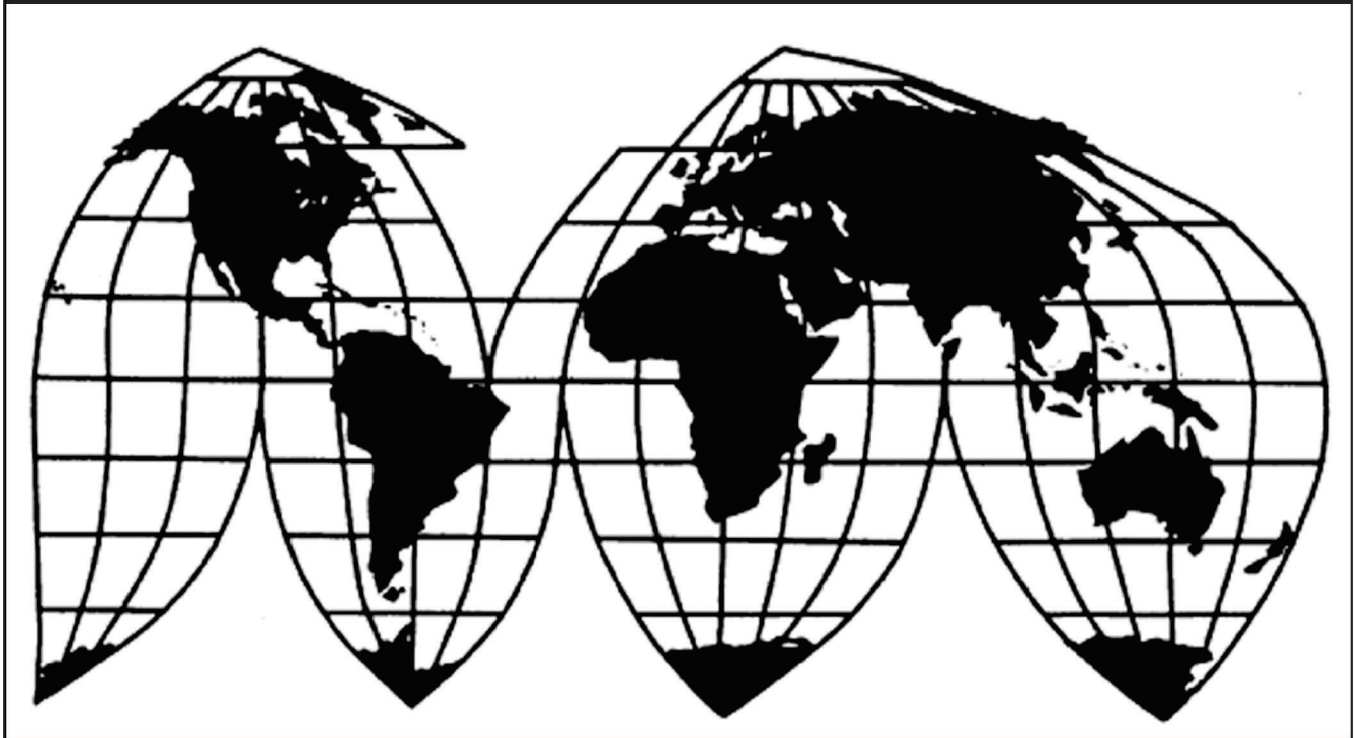
Paper File Folders from China, India, and Vietnam

Investigation Nos. 701-TA-683 and 731-TA-1594-1596 (Preliminary)

Publication 5389

December 2022

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Note.—Information that would reveal confidential operations of individual concerns may not be published.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-683 and 731-TA-1594-1596 (Preliminary)

Paper File Folders from China, India, and Vietnam

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 there is a reasonable indication that an industry in the United States is materially injured by reason of imports of paper file folders from China, India, and Vietnam provided for in subheading 4820.30.00 of the Harmonized Tariff Schedule of the United States, that are alleged to be sold in the United States at less than fair value (“LTFV”) and to be subsidized by the government of India.²

COMMENCEMENT OF FINAL PHASE INVESTIGATIONS

Pursuant to section 207.18 of the Commission’s rules, the Commission also gives notice of the commencement of the final phase of its investigations. The Commission will issue a final phase notice of scheduling, which will be published in the *Federal Register* as provided in § 207.21 of the Commission’s rules, upon notice from the U.S. Department of Commerce (“Commerce”) of affirmative preliminary determinations in the investigations under §§ 703(b) or 733(b) of the Act, or, if the preliminary determinations are negative, upon notice of affirmative final determinations in those investigations under §§ 705(a) or 735(a) of the Act. Parties that filed entries of appearance in the preliminary phase of the investigations need not enter a separate appearance for the final phase of the investigations. Industrial users, and, if the merchandise under investigation is sold at the retail level, representative consumer organizations have the right to appear as parties in Commission antidumping and countervailing duty investigations. The Secretary will prepare a public service list containing the names and addresses of all persons, or their representatives, who are parties to the investigations.

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

² 87 FR 67441 and 87 FR 67447, November 8, 2022.

BACKGROUND

On October 12, 2022, the Coalition of Domestic Folder Manufacturers, Hastings, Minnesota and Naperville, Illinois filed petitions with the Commission and Commerce, alleging that an industry in the United States is materially injured or threatened with material injury by reason of subsidized imports of paper file folders from India and LTFV imports of paper file folders from China, India, and Vietnam. Accordingly, effective October 12, 2022, the Commission instituted countervailing duty investigation No. 701-TA-683 and antidumping duty investigation Nos. 731-TA-1594-1596 (Preliminary).

Notice of the institution of the Commission's investigations and of a public conference to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* of October 19, 2022 (87 FR 63526). The Commission conducted its conference on November 2, 2022. All persons who requested the opportunity were permitted to participate.

Views of the Commission

Based on the record in the preliminary phase of these investigations, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of paper file folders (“PFFs”) from China, India, and Vietnam that are allegedly sold in the United States at less than fair value (“LTFV”) and imports of the subject merchandise from India that are allegedly subsidized by the government of India.

I. The Legal Standard for Preliminary Determinations

The legal standard for preliminary antidumping and countervailing duty determinations requires the Commission to determine, based upon the information available at the time of the preliminary determinations, whether there is a reasonable indication that a domestic industry is materially injured or threatened with material injury, or that the establishment of an industry is materially retarded, by reason of the allegedly unfairly traded imports.¹ In applying this standard, the Commission weighs the evidence before it and determines whether “(1) the record as a whole contains clear and convincing evidence that there is no material injury or threat of such injury; and (2) no likelihood exists that contrary evidence will arise in a final investigation.”²

¹ 19 U.S.C. §§ 1671b(a), 1673b(a) (2000); see also *American Lamb Co. v. United States*, 785 F.2d 994, 1001-04 (Fed. Cir. 1986); *Aristech Chem. Corp. v. United States*, 20 CIT 353, 354-55 (1996). No party argues that the establishment of an industry in the United States is materially retarded by the allegedly unfairly traded imports.

² *American Lamb Co.*, 785 F.2d at 1001; see also *Texas Crushed Stone Co. v. United States*, 35 F.3d 1535, 1543 (Fed. Cir. 1994).

II. Background

A. Parties to the Investigations

The Coalition of Domestic Folder Manufacturers (“Petitioner”) filed the petitions in these investigations on October 12, 2022. Petitioner consists of Smead Manufacturing Company, Inc. (“Smead”) and TOPS Products LLC (“TOPS”), domestic producers of PFFs.³ Petitioner appeared at the staff conference accompanied by counsel and submitted a postconference brief.

Several respondent entities participated in these investigations, including Staples Inc. (“Staples”), a wholesaler of PFFs and U.S. importer of subject merchandise; Target General Merchandise, Inc. (“Target”) and Thrasio LLC (“Thrasio”), U.S. importers of subject merchandise; Navneet Education Limited (India) (“Navneet”), a producer of subject merchandise in India; and Three-Color Stone Stationery (Viet Nam) Company Limited (“Three-Color Stone”), a producer of subject merchandise in Vietnam. Staples, Navneet, and Three-Color Stone (“Staples Coalition”) were represented at the staff conference by counsel and submitted a joint postconference brief.⁴ Target also filed a postconference brief.

B. Data Coverage

The period of investigation in the preliminary phase of these investigations is January 2019 through June 2022 (“POI”). U.S. industry data are based on the questionnaire responses of two domestic producers, accounting for between *** percent of U.S. production of PFFs in

³ Petitions at 2-3.

⁴ Thrasio joined the Staples Coalition’s postconference brief.

2021.⁵ U.S. import data are based on official U.S. Department of Commerce (“Commerce”) import statistics and questionnaire responses from nine U.S. importers, accounting for the majority of U.S. imports from subject sources and the vast majority of U.S. imports from nonsubject sources classified under Harmonized Tariff Schedule of the United States (“HTSUS”) statistical reporting number 4820.30.0040, a “basket” category that includes out-of-scope merchandise.⁶ The Commission received responses to its questionnaires from four foreign producers of subject merchandise: one producer in China that was unable to provide an estimate for its share of total production of subject merchandise in China;⁷ one producer in India that was unable to provide an estimate for its share of total production of subject merchandise in India;⁸ and two producers in Vietnam, estimated to account for over 20 percent of production of subject merchandise in Vietnam during 2021.⁹

C. Import Data Issues

Official U.S. import statistics overstate the volume of subject imports while importer questionnaire data on the record of the preliminary phase of these investigations understate the volume of imports of PFF.¹⁰ Official statistics from Commerce concerning U.S. imports

⁵ Confidential Staff Report, Memorandum INV-UU-113 (“CR”) at I-4 and III-1; *Paper File Folders from China, India, and Vietnam*, Inv. Nos. 701-TA-683 and 731-TA-1594-1596 (Preliminary), USITC Pub. 5389 (Dec. 2022) (“PR”) at I-4 and III-1.

⁶ CR/PR at I-7 n.10 and IV-1.

⁷ CR/PR at VII-3.

⁸ CR/PR at VII-9.

⁹ CR/PR at VII-16. One producer in Vietnam was unable to provide an estimate for its share of total production of subject merchandise in Vietnam in 2021; another estimated that it accounted for 20 percent of total production of subject merchandise in Vietnam that year. *Id.*

¹⁰ Petitioner has indicated that publicly available information regarding the U.S. PFF market and global PFF industries is not readily available. See Conf. Tr. at 90-91 (Roberts). According to Petitioner, the scope of these investigations as defined by Commerce corresponds to only a subset of file folder (Continued...)

classified under HTS statistical reporting number 4820.30.0040 likely contain large volumes of out-of-scope merchandise and thus overstate the volume of PFF imports.¹¹ Additionally, responding U.S. importers reported importing small volumes of PFFs classified under HTS statistical reporting numbers other than 4820.30.0040, and these imports are thus not captured in the official import statistics covering HTS statistical reporting number 4820.30.0040.¹² Further, official import statistics are reported by weight (*i.e.*, kilograms) rather than by number of folders, whereas responding domestic producers maintain data on their PFF operations on the basis of number of folders.¹³

The Commission received useable questionnaire responses from nine firms believed to account for the majority of PFF imports from China, India, and Vietnam and the vast majority of PFF imports from nonsubject sources during the POI.¹⁴ These import data were collected on the basis of folder units and pounds.¹⁵ A small number of responding importers accounted for a large proportion of reported U.S. imports of PFFs, with the others each importing significantly

(...Continued)

products, thereby limiting the utility of any data that might be tracked regularly by industry participants or associations. *See id.* at 6 (Taylor).

¹¹ According to questionnaire data gathered in the preliminary phase of these investigations out-of-scope merchandise accounted for the following percentage of imports reported under HTS statistical reporting number 4820.30.0040 over the period: China – between *** and *** percent; India – between *** and *** percent; and Vietnam – between *** and *** percent. *See* Worksheet, EDIS Doc. No. 785019 (Nov. 22, 2022).

¹² *See* U.S. importers' questionnaires, responses to Questions II-5a, II-6a, and II-7a.

¹³ *See, e.g.*, Conf. Tr. at 50 (Vaughn).

¹⁴ CR/PR at III-1, IV-1. Questionnaires were issued to companies identified in the petitions and to firms that imported more than 1.0 percent of total imports from China, India or Vietnam during the period examined under HTS statistical reporting number 4820.30.0040. The Commission sent importer questionnaires to each of the 20 firms meeting these criteria. CR/PR at III-1 and IV-1.

¹⁵ *Compare* CR/PR at Tables IV-2 and IV-9 *with* Tables E-1-E-2.

smaller volumes of PFFs.¹⁶ The questionnaire data collected in the preliminary phase of the investigations do not cover all U.S. imports of PFFs, however, because 11 known U.S. importers of PFFs either completed no questionnaire response or provided late or incomplete questionnaire responses, including ***.¹⁷ ¹⁸

We find that the questionnaire data generally provide a more reliable measure of subject imports for purposes of the preliminary phase of these investigations, given the breadth of official U.S. import statistics and the large volume of imports under that basket category that comprise out-of-scope merchandise. We therefore primarily rely on questionnaire data for purposes of the preliminary phase of these investigations, while also considering official import statistics as appropriate. We recognize that questionnaire data understate the volume of subject imports due to the less than complete coverage in U.S. importers responding to the

¹⁶ CR/PR at Table IV-1.

¹⁷ CR/PR at I-7 & n.10 and IV-1 n.2. ***, which provided unusable U.S. shipment data, reported substantial imports from China in 2019 and 2020 and Vietnam in 2021 and interim 2022. See *** Questionnaire Response, EDIS Doc. No. 784351 (Nov. 14, 2022) at II-5a, II-7a. As a result, data from this firm are not included in the subject import volumes calculated for purposes of these preliminary investigations.

¹⁸ We note that the questionnaire data on U.S. imports of PFFs do not correspond with the export data provided by foreign producers. Export data collected from responding Chinese producers are substantially lower than import data collected from responding U.S. importers. Compare CR/PR at Table IV-2 with Table VII-4. Conversely, export data collected from responding Vietnamese producers are substantially higher than import data collected from responding U.S. importers. Compare CR/PR at Table IV-2 with Table VII-17. While export data collected from responding Indian producers are generally lower than import data collected from responding U.S. importers, these two datasets are comparatively more aligned than for the other subject sources. Compare CR/PR at Table IV-2 with Table VII-10.

Commission’s questionnaire. We intend to seek more complete import data in any final phase of these investigations.¹⁹

III. Domestic Like Product

In determining whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of imports of the subject merchandise, the Commission first defines the “domestic like product” and the “industry.”²⁰ Section 771(4)(A) of the Tariff Act of 1930, as amended (“the Tariff Act”), defines the relevant domestic industry as the “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”²¹ In turn, the Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation.”²²

By statute, the Commission’s “domestic like product” analysis begins with the “article subject to an investigation,” *i.e.*, the subject merchandise as determined by Commerce.²³ Therefore, Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value is “necessarily the starting point of the

¹⁹ We invite interested parties in their comments on the draft questionnaires to provide suggestions on the best methodology to maximize coverage of subject imports in any final phase of these investigations, and the best unit of measure for volume of imports and domestic product.

²⁰ 19 U.S.C. § 1677(4)(A).

²¹ 19 U.S.C. § 1677(4)(A).

²² 19 U.S.C. § 1677(10).

²³ 19 U.S.C. § 1677(10). The Commission must accept Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value. *See, e.g., USEC, Inc. v. United States*, 34 Fed. App’x 725, 730 (Fed. Cir. 2002) (“The ITC may not modify the class or kind of imported merchandise examined by Commerce.”); *Algoma Steel Corp. v. United States*, 688 F. Supp. 639, 644 (Ct. Int’l Trade 1988), *aff’d*, 865 F.3d 240 (Fed. Cir.), *cert. denied*, 492 U.S. 919 (1989).

Commission’s like product analysis.”²⁴ The Commission then defines the domestic like product in light of the imported articles Commerce has identified.²⁵ The decision regarding the appropriate domestic like product(s) in an investigation is a factual determination, and the Commission has applied the statutory standard of “like” or “most similar in characteristics and uses” on a case-by-case basis.²⁶ No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.²⁷ The Commission looks for clear dividing lines among possible like products and disregards minor variations.²⁸ The Commission may, where appropriate, include domestic articles in the domestic like product in addition to those described in the scope.²⁹

²⁴ *Cleo Inc. v. United States*, 501 F.3d 1291, 1298 (Fed. Cir. 2007); *see also Hitachi Metals, Ltd. v. United States*, Case No. 19-1289, slip op. at 8-9 (Fed. Circ. Feb. 7, 2020) (the statute requires the Commission to start with Commerce’s subject merchandise in reaching its own like product determination).

²⁵ *Cleo*, 501 F.3d at 1298 n.1 (“Commerce’s {scope} finding does not control the Commission’s {like product} determination.”); *Hosiden Corp. v. Advanced Display Mfrs.*, 85 F.3d 1561, 1568 (Fed. Cir. 1996) (the Commission may find a single like product corresponding to several different classes or kinds defined by Commerce); *Torrington Co. v. United States*, 747 F. Supp. 744, 748–52 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (affirming the Commission’s determination defining six like products in investigations where Commerce found five classes or kinds).

²⁶ *See, e.g., Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Torrington Co. v. United States*, 747 F. Supp. 744, 749 n.3 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (“every like product determination ‘must be made on the particular record at issue’ and the ‘unique facts of each case’”). The Commission generally considers a number of factors including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. *See Nippon*, 19 CIT at 455 n.4; *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996).

²⁷ *See, e.g., S. Rep. No. 96-249 at 90-91 (1979).*

²⁸ *See, e.g., Nippon*, 19 CIT at 455; *Torrington*, 747 F. Supp. at 748-49; *see also S. Rep. No. 96-249 at 90-91 (Congress has indicated that the like product standard should not be interpreted in “such a narrow fashion as to permit minor differences in physical characteristics or uses to lead to the conclusion that the product and article are not ‘like’ each other, nor should the definition of ‘like* (Continued...)

A. Scope Definition

In its notice of initiation, Commerce defined the imported merchandise within the scope of these investigations as follows:

{F}ile folders consisting primarily of paper, paperboard, pressboard, or other cellulose material, whether coated or uncoated, that has been folded (or creased in preparation to be folded), glued, taped, bound, or otherwise assembled to be suitable for holding documents. The scope includes all such folders, regardless of color, whether or not expanding, whether or not laminated, and with or without tabs, fasteners, closures, hooks, rods, hangers, pockets, gussets, or internal dividers. The term “primarily” as used in the first sentence of this scope means 50 percent or more of the total product weight, exclusive of the weight of fasteners, closures, hooks, rods, hangers, removable tabs, and similar accessories, and exclusive of the weight of packaging.

Subject folders have the following dimensions in their folded and closed position: lengths and widths of at least 8 inches and no greater than 17 inches, regardless of depth.

The scope covers all varieties of folders, including but not limited to manila folders, hanging folders, fastener folders, classification folders, expanding folders, pockets, jackets, and wallets.

Excluded from the scope are:

- mailing envelopes with a flap bearing one or more adhesive strips that can be used permanently to seal the entire length of a side such that, when sealed, the folder is closed on all four sides;
- binders, with two or more rings to hold documents in place, made from paperboard or pressboard encased entirely in plastic;
- non-expanding folders with a depth exceeding 2.5 inches and that are closed or closeable on the top, bottom, and all four sides (e.g., boxes or cartons);

(...Continued)

product’ be interpreted in such a fashion as to prevent consideration of an industry adversely affected by the imports under consideration.”).

²⁹ See, e.g., *Pure Magnesium from China and Israel*, Inv. Nos. 701-TA-403 and 731-TA-895-96 (Final), USITC Pub. 3467 at 8 n.34 (Nov. 2001); *Torrington*, 747 F. Supp. at 748-49 (holding that the Commission is not legally required to limit the domestic like product to the product advocated by the petitioner, co-extensive with the scope).

- expanding folders that have (1) 13 or more pockets, (2) a flap covering the top, (3) a latching mechanism made of plastic and/or metal to close the flap, and (4) an affixed plastic or metal carry handle;
- expanding folders that have an outer surface (other than the gusset, handles, and/or closing mechanisms) that is covered entirely with fabric, leather, and/or faux leather;
- fashion folders, which are defined as folders with all of the following characteristics: (1) plastic lamination covering the entire exterior of the folder, (2) printing, foil stamping, embossing (i.e., raised relief patterns that are recessed on the opposite side), and/or debossing (i.e., recessed relief patterns that are raised on the opposite side), covering the entire exterior surface area of the folder, (3) at least two visible and printed or foil stamped colors other than the color of the base paper, and other than the printing of numbers, letters, words, or logos, each of which separately covers no less than 10 percent of the entire exterior surface area, and (4) patterns, pictures, designs, or artwork covering no less than thirty percent of the exterior surface area of the folder;
- portfolios, which are folders having (1) a width of at least 16 inches when open flat, (2) no tabs or dividers, and (3) one or more pockets that are suitable for holding letter size documents and that cover at least 15 percent of the surface area of the relevant interior side or sides; and
- report covers, which are folders having (1) no tabs, dividers, or pockets, and (2) one or more fasteners or clips, each of which is permanently affixed to the center fold, to hold papers securely in place.

Imports of the subject merchandise are provided for under Harmonized Tariff Schedule of the United States (HTSUS) category 4820.30.0040. Subject imports may also enter under other HTSUS classifications. While the HTSUS subheading is provided for convenience and customs purposes, the written description of the scope of the investigations is dispositive.³⁰

File folders are folded products used mainly to hold documents or other records together for professional office or home office organization. PFFs are primarily made of paper, paperboard, pressboard, or other cellulose material.³¹

³⁰ *Paper File Folders From the People’s Republic of China, India, and the Socialist Republic of Vietnam: Initiation of Less-Than-Fair-Value Investigations*, 87 Fed. Reg. 67,441 (Nov. 8, 2022); *Paper File Folders From India: Initiation of Countervailing Duty Investigation*, 87 Fed. Reg. 67,447 (Nov. 8, 2022).

³¹ CR/PR at I-7-I-8.

PFFs can be glued, taped, bound, or otherwise assembled. They can also be coated or uncoated; laminated or not; and expanding or not. They may incorporate fasteners, closures, hooks, rods, hangers, pockets, gussets, or internal dividers. All PFFs are folded to be opened on a least one side to allow for the insertion and removal of documents and other materials. They generally feature plain designs and colors. They also commonly feature some type of tab or label that allows one to identify the type of information contained within.³²

PFFs are usually designed to hold documents of the two primary paper sizes in North America: (1) letter size and (2) legal size. As such, PFFs, in their folded and closed position, have lengths and widths of at least 8 inches and no greater than 17 inches, regardless of depth. There are many types of PFFs, including but not limited to manila folders, hanging folders, fastener folders, classification folders, expanding folders, pockets, jackets, and wallets.³³

B. Arguments of the Parties

Petitioners' Argument. Petitioner argues that the Commission should define a single domestic like product, consisting of PFFs, that is coextensive with the scope.³⁴ It claims that PFFs comprise a distinct product from file folders made of plastic materials.³⁵

Respondents' Argument. The Staples Coalition does not contest Petitioner's proposed definition of the domestic like product but reserves the right to do so in any final phase of these

³² CR/PR at I-8.

³³ CR/PR at I-8-I-9.

³⁴ Petitions at 13-18; Petitioner's Postconf. Br. at 3-9.

³⁵ Petitioner's Postconf. Br. Exh. 1, Responses to Staff Questions, at 12-13. *See also* Petitioner's Response to Volume I Supplemental Questionnaire, EDIS Doc. No. 782755 (Oct. 21, 2022) at 13-17.

investigations, particularly as, in its view, the proposed definition appears to exclude certain products that are similar to and competitive with subject imports.³⁶

C. Analysis

Based on the following analysis, and in the absence of any party argument to the contrary, we define a single domestic like product consisting of PFFs, coextensive with the scope in these investigations.

Physical Characteristics and Uses. The record indicates that all domestically produced PFFs within the scope are made primarily from base paper material.³⁷ PFFs come in various forms and finishes and may contain additional features, with hundreds of retailer-specific different stock-keeping units (“SKUs”) encompassed by the scope. As they are all designed to hold documents of the two primary paper sizes in North America, letter size and legal size, PFFs, in their folded and closed position, have lengths and widths of at least 8 inches and no greater than 17 inches. They are all generally folded on at least one side, to allow for insertion and removal of documents; feature plain designs and colors; and incorporate some type of tab or label.³⁸ PFFs are used primarily by end-users to hold documents or other records together for professional or home office organization.³⁹

³⁶ Staples Coalition’s Postconf. Br. at 1-2. The Staples Coalition indicates that it may raise like product issues with respect to, among other items, nonsubject binders classified under HTS number 4820.30.0040. *Id.* Target did not address like product issues in its brief.

To the extent that any party wishes to propose different definitions of the domestic like product in any final phase of these investigations, it should provide specificity as to proposed definitions and data collection in its comments on the draft questionnaires, pursuant to 19 C.F.R. § 207.20(b).

³⁷ CR/PR at I-8.

³⁸ CR/PR at I-8-I-9. *See also* Conf. Tr. at 34-37 (Garber).

³⁹ CR/PR at I-7.

According to Petitioner, file folders made of plastic material (so-called “poly folders”) are water-resistant, generally more durable than PFFs, and are less prone to tearing. It asserts that these characteristics make poly folders more suitable for use by end-users while traveling than PFFs, which are at greater risk of damage from water or rough handling.^{40 41}

Manufacturing Facilities, Production Processes and Employees. The record indicates that all domestically produced PFFs within the scope are generally manufactured using the same production process, which includes setting up a roll of base paper at the beginning of the production line, using a die cutting machine to size and scope the paper, adding any finishing required to achieve proper functionality for the PFF product being produced, and preparing the PFF product for shipment.^{42 43} Petitioner submits that it produces in-scope PFFs at the same facilities, using the same production processes and equipment, and the same employees.⁴⁴

According to Petitioner, poly file folders are made in different manufacturing facilities by different employees using a production process that is appropriate for plastic rather than

⁴⁰ Petitioner’s Response to Volume I Supplemental Questionnaire at 14-15. *See also* Conf. Tr. at 39-40 (Beckman), 76 (Avent).

⁴¹ The Commission did not collect information concerning poly folders in these preliminary phase investigations.

⁴² CR/PR at I-15-I-17.

⁴³ We note that the Staples Coalition submits that the production of expanding file folders is less automated than production of other PFFs. Staples Coalition’s Postconf. Br., Exh. 6, Responses of Foreign Producers to Staff Questions, at 2-3.

⁴⁴ Petitions at 17; Petitioner’s Postconf. Br. at 8-9. *See also* Conf. Tr. at 20 (Roberts), 41 (Beckman).

paper.⁴⁵ The record of the preliminary phase of the investigations thus indicates that U.S. producers do not produce poly file folders on the same equipment used to produce PFFs.⁴⁶

Channels of Distribution. The record indicates that U.S. producers sold PFFs predominantly to retailers, followed by distributors.⁴⁷ They also made a small number of sales to end-users.⁴⁸ Responding importers *** retailers ***.⁴⁹

According to Petitioner, poly file folders are sold separately through the same office supply stores as PFFs.⁵⁰

Interchangeability. The record indicates a high degree of interchangeability among the different types of PFFs, depending on the type of filing system used by an end-user's organization.⁵¹

According to Petitioner, PFFs cannot be used interchangeably with poly file folders in situations where the end-user is concerned about damage from water and other elements.

⁴⁵ Petitioner's Response to Volume I Supplemental Questionnaire at 16. *See also* Conf. Tr. at 40 (Beckman).

⁴⁶ The limited information on the record suggests that there may not be much U.S. production of poly file folders. *See* Staples Coalition's Postconf. Br., Exh. 7, Responses of Staples to Staff Questions, at 4. *See also* Conf. Tr. at 7 (Roberts). We note that the domestic industry witness's testimony appears at odds with Petitioner's response to supplemental questions from Commerce, where it alludes to "poly file folders with the Smead brand" that are sold at higher prices than "paper file folders with the Smead brand." *See* Petitioner's Response to Volume I Supplemental Questionnaire at 16.

⁴⁷ CR/PR at Table II-1.

⁴⁸ CR/PR at Table II-1.

⁴⁹ CR/PR at II-2 and Table II-1. More than *** percent of subject imports were to retailers in every year of the POI and in interim 2022. *Id.*

⁵⁰ Petitioner's Response to Volume I Supplemental Questionnaire at 15.

⁵¹ CR/PR at II-8; Conf. Tr. at 16, 86-87 (Vaughn). *See also* Conf. Tr. at 14 (Vaughn) and 130 (Schroth) (characterizing PFFs within the scope as "commodity products.")

Moreover, it asserts that the higher price of poly file folders makes their use uneconomical in applications where paper file folders would be just as effective.⁵²

Producer and Customer Perceptions. The limited information on the record indicates that customers and producers perceive domestically-produced PFFs that are within the scope as comprising a separate and distinct product category compared to out-of-scope file folders such as poly file folders.⁵³

Price. According to Petitioner, while PFFs lie on a continuum of products, there is a relationship among pricing for all PFFs in the scope, with the pricing of manila folders influencing the pricing of other PFFs in contract negotiations.⁵⁴ The pricing data on the record indicate that there were some variations in quarterly sales prices among the various pricing products for domestically produced PFFs during the POI.⁵⁵

According to Petitioner, poly file folders are significantly higher-priced than PFFs.⁵⁶

Conclusion. The record of the preliminary phase of the investigations indicates that the different types of PFFs within the scope exist on a continuum constituting a single domestic like product. All domestically produced PFFs within the scope are made primarily of base paper materials. Although there are differences in form, finishes, and features among different PFF products, all domestically produced PFFs within the scope are designed to hold documents, and share common features, including a fold on at least one side, plain designs and colors, and

⁵² Petitioner's Response to Volume I Supplemental Questionnaire at 15.

⁵³ Petitions at 16-17; Petitioner's Response to Volume I Supplemental Questionnaire at 15-16; Petitioner's Postconf. Br. at 16-17. *See also* Conf. Tr. 33-34 (Garber), 40 (Beckman).

⁵⁴ Petitioner's Postconf. Br. at 9. *See also* Conf. Tr. at 6 (Taylor), 42 (Beckman).

⁵⁵ CR/PR at Tables V-2-V-4.

⁵⁶ Petitioner's Response to Volume I Supplemental Questionnaire at 16.

some type of tab or label. All domestically produced PFFs within the scope generally are produced using the same production processes and employees in the same manufacturing facilities; are generally interchangeable and used to maintain office filing systems; are sold overwhelmingly through the same channels of distribution, albeit at varying prices; and are perceived to be a single product category by market participants. Although no party argues for defining the domestic like product more broadly than the scope for purposes of these preliminary determinations, information provided by Petitioner indicates that PFFs within the scope are distinguishable from out-of-scope poly file folders with respect to most like product factors, notwithstanding some overlap in terms of physical characteristics and uses and interchangeability.

In light of the above, and in the absence of any contrary argument, we define a single domestic like product consisting of all domestically produced PFFs, coextensive with the scope.

IV. Domestic Industry

The domestic industry is defined as the domestic “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”⁵⁷ In defining the domestic industry, the Commission’s general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

⁵⁷ 19 U.S.C. § 1677(4)(A).

A. Related Parties

We must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to Section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.⁵⁸ Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.⁵⁹

Domestic producers *** qualify as related parties.⁶⁰ *** has a *** percent ownership stake in ***, a U.S. importer of subject merchandise.⁶¹ Additionally, *** qualify for possible exclusion under the related parties provision because they imported subject merchandise.⁶²

⁵⁸ See *Torrington Co. v. United States*, 790 F. Supp. 1161, 1168 (Ct. Int'l Trade 1992), *aff'd without opinion*, 991 F.2d 809 (Fed. Cir. 1993); *Sandvik AB v. United States*, 721 F. Supp. 1322, 1331-32 (Ct. Int'l Trade 1989), *aff'd mem.*, 904 F.2d 46 (Fed. Cir. 1990); *Empire Plow Co. v. United States*, 675 F. Supp. 1348, 1352 (Ct. Int'l Trade 1987).

⁵⁹ The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

- (1) the percentage of domestic production attributable to the importing producer;
- (2) the reason the U.S. producer has decided to import the product subject to investigation (whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market);
- (3) whether inclusion or exclusion of the related party will skew the data for the rest of the industry;
- (4) the ratio of import shipments to U.S. production for the imported product; and
- (5) whether the primary interest of the importing producer lies in domestic production or importation. *Changzhou Trina Solar Energy Co. v. USITC*, 100 F. Supp.3d 1314, 1326-31 (Ct. Int'l. Trade 2015); see also *Torrington Co. v. United States*, 790 F. Supp. at 1168.

⁶⁰ CR/PR at III-2 and Tables III-2, III-9-III-11.

⁶¹ CR/PR at Table III-2.

⁶² CR/PR at Tables III-9-III-11.

B. Arguments of the Parties

Petitioner's Arguments. Petitioner argues that the Commission should define the domestic industry to include all domestic producers of PFFs.⁶³ It contends that, while *** are subject to possible exclusion as related parties, appropriate circumstances do not exist to exclude them from the domestic industry.⁶⁴

Respondents' Arguments. The Staples Coalition submits that all domestic producers of PFFs should be included as members of the domestic industry.⁶⁵

C. Analysis

We find that appropriate circumstances do not exist to exclude either *** from the domestic industry, based upon the following analysis.

***. The record indicates that ***, was responsible for *** percent of reported U.S. production of PFFs in 2021, and was the *** of the two responding U.S. producers that year in terms of quantity of U.S. production.⁶⁶ *** imports of subject merchandise were *** folders in 2019, *** folders in 2020, and *** folders in 2021; they were *** folders in January through June (“interim”) 2022 compared to *** folders in interim 2021.⁶⁷ The ratio of *** imports of subject merchandise to *** domestic production was *** percent in 2019 and *** percent in

⁶³ Petitions at 18-19; Petitioner’s Postconf. Br. at 10.

⁶⁴ Petitions at 19 n.54; Petitioner’s Postconf. Br. at 10-12.

⁶⁵ Staples Coalition’s Postconf. Br. at 1. Target did not address domestic industry issues in its brief.

⁶⁶ CR/PR at Table IIII-1.

⁶⁷ CR/PR at Table III-9.

2020 and 2021; it was *** percent in interim 2022 compared to *** percent in interim 2021.⁶⁸

*** indicated that it imported subject merchandise to ***.⁶⁹

In view of the fact that imports of subject merchandise by *** were small in relation to *** domestic production, *** principal interest would appear to be in domestic production. We therefore find that appropriate circumstances do not exist to exclude *** from the domestic industry under the related parties provision.

***. The record indicates that ***, was responsible for *** percent of reported U.S. production of PFFs in 2021, and was the *** of the two responding U.S. producers that year in terms of quantity of U.S. production.⁷⁰ *** imported *** subject folders in 2019, *** subject folders in 2020, and *** subject folders in 2021; it imported *** folders in interim 2022 compared to *** folders in interim 2021.⁷¹ Its ratio of imports of subject merchandise to its domestic production was *** percent in 2019, *** percent in 2020, and *** percent in 2021; it was *** percent in interim 2022 compared to *** percent in interim 2021.⁷² *** indicated that it imported subject merchandise to ***.⁷³

In view of the fact that imports of subject merchandise by *** were small in relation to its domestic production, *** principal interest would appear to be in domestic production. We therefore find that appropriate circumstances do not exist to exclude *** from the domestic industry under the related parties provision.

⁶⁸ CR/PR at Table III-9.

⁶⁹ CR/PR at Table III-11.

⁷⁰ CR/PR at Table III-1.

⁷¹ CR/PR at Table III-10.

⁷² CR/PR at Table III-10.

⁷³ CR/PR at Table III-11.

In sum, consistent with our definition of the domestic like product, we define the domestic industry as consisting of all U.S. producers of PFFs.

V. 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 be deemed negligible.⁷⁴

A. Arguments of the Parties

Petitioner's Arguments. Petitioner argues that Census data show that imports from each of the subject countries are above the negligibility thresholds. Should the Commission rely on importer questionnaire data and find that subject imports from China are below the statutory negligibility threshold, it argues that these data are understated, and that the Commission will likely obtain questionnaire data from additional importers in any final phase of these investigations indicating that subject imports from China are not negligible.⁷⁵

⁷⁴ 19 U.S.C. §§ 1671b(a), 1673b(a), 1677(24)(A)(i), 1677(24)(B); *see also* 15 C.F.R. § 2013.1 (developing countries for purposes of 19 U.S.C. § 1677(36)).

⁷⁵ Petitions at 22; Petitioner's Postconf. Br. at 12-14. Petitioner contends that questionnaire data captured *** of imports captured by Census data in interim 2022, notwithstanding that the "vast majority" of these imports were purportedly in-scope merchandise. *Id.* at 13 n.49. It bases its contention on an analysis conducted by the ***, a global market information company, indicating that sales of out-of-scope product during 2021 accounted for approximately 24 percent of imports reported under HTS 4820.30.0040. *Id.* Exh. 1 at 7-9.

As discussed above in Section II.C, HTS statistical reporting number 4820.30.0040 contains large volumes of products other than PFFs, particularly from subject sources.

Respondents' Arguments. Respondent parties do not contest Petitioner's argument that imports from each of the subject countries are above the negligibility thresholds.⁷⁶

B. Analysis

According to official U.S. import statistics, subject imports from China accounted for *** percent of total imports, subject imports from India accounted for *** percent of total imports, and subject imports from Vietnam accounted for *** percent of total imports between October 2021 through September 2022.⁷⁷ According to questionnaire data, subject imports from China accounted for *** percent of total imports, subject imports from India accounted for *** percent of total imports, and subject imports from Vietnam accounted for *** percent of total imports in this period.⁷⁸ As discussed in section II.C above, however, because official U.S. import statistics overstate subject import volume while questionnaire data understate it, neither provides an entirely accurate measure of U.S. imports of PFFs.

To calculate a more accurate estimate of PFF import volumes for purposes of negligibility, Commission staff adjusted official U.S. import statistics by removing volumes of out-of-scope merchandise as reported in the questionnaire data as a share of total primary HTS questionnaire data for statistical reporting number 4820.30.0040, and by adding additional volumes of PFFs that were imported under other HTS numbers based on questionnaire data.⁷⁹ According to these adjusted data, subject imports from China accounted for *** percent of total imports, subject imports from India (for both the countervailing and antidumping duty

⁷⁶ See Conf. Tr. at 139 (Schroth). See also Staples Coalition's Postconf. Br. at 1. Target does not address negligibility in its brief.

⁷⁷ See CR/PR at IV-11 n.16; Worksheet.

⁷⁸ CR/PR at Table IV-5.

⁷⁹ CR/PR at IV-11 n.16.

investigations) accounted for *** percent of total imports, and subject imports from Vietnam accounted for *** percent of total imports from October 2021 through September 2022.⁸⁰

Because imports for each country subject to these investigations are above the statutory threshold based on the information available in the preliminary phase of the investigations, we find that imports for each of the subject investigations are not negligible. In view of the data issues discussed above, we intend to reconsider our negligibility analysis in any final phase of these investigations.

VI. Cumulation

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

- (1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality related questions;
- (2) the presence of sales or offers to sell in the same geographic markets of subject imports from different countries and the domestic like product;
- (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and
- (4) whether the subject imports are simultaneously present in the market.⁸¹

⁸⁰ CR/PR at IV-11 n.16.

While no single factor is necessarily determinative, and the list of factors is not exclusive, these factors are intended to provide the Commission with a framework for determining whether the subject imports compete with each other and with the domestic like product.⁸² Only a “reasonable overlap” of competition is required.⁸³

A. Arguments of the Parties

Petitioner’s Arguments. Petitioner argues that imports from each subject source should be cumulated. It contends that the petitions were filed on the same day and there is a reasonable overlap of competition between and among subject imports from each source and the domestic like product. Specifically, it contends that subject imports from each source and the domestic like product are fungible, sold in all geographic regions, simultaneously present in the U.S. market, and sold through the same channels of distribution.⁸⁴

Respondents’ Arguments. No respondent party contests cumulation.⁸⁵

B. Analysis

We consider subject imports from China, India, and Vietnam on a cumulated basis, because the record indicates that the statutory criteria for cumulation are satisfied. Petitioner

(...Continued)

⁸¹ See *Certain Cast-Iron Pipe Fittings from Brazil, the Republic of Korea, and Taiwan*, Inv. Nos. 731-TA-278-80 (Final), USITC Pub. 1845 (May 1986), *aff’d*, *Fundicao Tupy, S.A. v. United States*, 678 F. Supp. 898 (Ct. Int’l Trade), *aff’d*, 859 F.2d 915 (Fed. Cir. 1988).

⁸² See, e.g., *Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int’l Trade 1989).

⁸³ The Statement of Administrative Action (SAA) to the Uruguay Round Agreements Act (URAA), expressly states that “the new section will not affect current Commission practice under which the statutory requirement is satisfied if there is a reasonable overlap of competition.” H.R. Rep. No. 103-316, Vol. I at 848 (1994) (*citing Fundicao Tupy*, 678 F. Supp. at 902); see *Goss Graphic Sys., Inc. v. United States*, 33 F. Supp. 2d 1082, 1087 (Ct. Int’l Trade 1998) (“cumulation does not require two products to be highly fungible”); *Wieland Werke, AG*, 718 F. Supp. at 52 (“Completely overlapping markets are not required.”).

⁸⁴ Petitions at 19-21; Petitioner’s Postconf. Br. at 15-19.

⁸⁵ See Staples Coalition’s Postconf. Br. at 1. Target does not address cumulation in its brief.

filed the antidumping duty petitions with respect to all three countries and the countervailing duty petition with respect to India on the same day, October 12, 2022.⁸⁶ The record also indicates a reasonable overlap of competition between subject imports from China, India, and Vietnam, and between subject imports from each source and the domestic like product, as discussed below.

Fungibility. The record indicates that domestically produced PFFs and subject imports from each subject country are fungible.⁸⁷ Both responding U.S. producers and all responding importers reported that PFFs from each subject source are always interchangeable with each other as well as the domestic like product.⁸⁸

In 2021, domestically produced PFFs and imports from each source were sold in overlapping types. Manila folders accounted for the largest volume of PFFs sold from all sources.⁸⁹ Hanging folders accounted for the second largest share of U.S. producers' sales and U.S. importers' sales of subject imports from China and Vietnam.^{90 91} Consequently, the record indicates that the domestic like product and PFFs from each subject source are fungible.⁹²

Channels of Distribution. During the POI, domestically produced PFFs and imports from each source were sold primarily to retailers. The remainder of domestically produced PFFs were sold to distributors, followed by end-users, whereas the remainder of subject imports

⁸⁶ None of the statutory exceptions to cumulation applies.

⁸⁷ CR/PR at II-8.

⁸⁸ CR/PR at Tables II-5-II-6.

⁸⁹ CR/PR at Table IV-6.

⁹⁰ CR/PR at Table IV-6.

⁹¹ While subject imports from India were *** manila folders, the Staples Coalition submits that *** production is based on market demand from the United States, which was lacking during the POI for fastener and classification products. Staples Coalition's Postconf. Br., Exh. 6 at 3-4.

⁹² CR/PR at Tables D-1-D-4 also indicates that domestically produced PFFs and subject imports from each source were sold in overlapping forms throughout the POI.

from China and Vietnam were sold to distributors.⁹³ The record thus shows overlapping channels of distribution with respect to domestically produced and subject imported PFFs.

Geographic Overlap. Domestically produced PFFs and imports from each subject country were sold in all geographic areas of the United States.⁹⁴ In addition, imports from each subject country entered the United States through all borders of entry in substantial volumes in 2021.⁹⁵ The record thus shows that imports from each subject country and domestically produced PFFs were sold in overlapping geographical areas.

Simultaneous Presence in Market. Official U.S. import statistics indicate that imports of PFFs from each subject source were present in the U.S. market with the domestic like product in every month of the POI.⁹⁶

Conclusion. The record shows that imports from each subject country are fungible with the domestic like product and with each other, and that subject imports from each subject country and the domestic like product overlapped in terms of channels of distribution and geographic markets. The record also indicates that imports from each subject country and the domestic like product were simultaneously present in the U.S. market.

Because the record indicates that there is a reasonable overlap of competition between and among imports from each subject country and the domestic like product, we cumulate subject imports from China, India, and Vietnam for purposes of our material injury analysis.

⁹³ CR/PR at Table II-1. Subject imports from India were sold *** to retailers. *Id.*

⁹⁴ CR/PR at Table II-2.

⁹⁵ CR/PR at Table IV-7.

⁹⁶ CR/PR at Table IV-8. *See also id.* at Tables III-7, V-2-V-4.

VII. Reasonable Indication of Material Injury by Reason of Subject Imports

A. Legal Standard

In the preliminary phase of antidumping and countervailing duty investigations, the Commission determines whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.⁹⁷ In making this determination, the Commission must consider the volume of subject imports, their effect on prices for the domestic like product, and their impact on domestic producers of the domestic like product, but only in the context of U.S. production operations.⁹⁸ The statute defines “material injury” as “harm which is not inconsequential, immaterial, or unimportant.”⁹⁹ In assessing whether there is a reasonable indication that the domestic industry is materially injured by reason of subject imports, we consider all relevant economic factors that bear on the state of the industry in the United States.¹⁰⁰ No single factor is dispositive, and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”¹⁰¹

Although the statute requires the Commission to determine whether there is a reasonable indication that the domestic industry is “materially injured or threatened with material injury by reason of” unfairly traded imports,¹⁰² it does not define the phrase “by reason of,” indicating that this aspect of the injury analysis is left to the Commission’s

⁹⁷ 19 U.S.C. §§ 1671b(a), 1673b(a).

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

⁹⁹ 19 U.S.C. § 1677(7)(A).

¹⁰⁰ 19 U.S.C. § 1677(7)(C)(iii).

¹⁰¹ 19 U.S.C. § 1677(7)(C)(iii).

¹⁰² 19 U.S.C. §§ 1671b(a), 1673b(a).

reasonable exercise of its discretion.¹⁰³ In identifying a causal link, if any, between subject imports and material injury to the domestic industry, the Commission examines the facts of record that relate to the significance of the volume and price effects of the subject imports and any impact of those imports on the condition of the domestic industry. This evaluation under the “by reason of” standard must ensure that subject imports are more than a minimal or tangential cause of injury and that there is a sufficient causal, not merely a temporal, nexus between subject imports and material injury.¹⁰⁴

In many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry. Such economic factors might include nonsubject imports; changes in technology, demand, or consumer tastes; competition among domestic producers; or management decisions by domestic producers. The legislative history explains that the Commission must examine factors other than subject imports to ensure that it is not attributing injury from other factors to the subject imports, thereby inflating an otherwise tangential cause of injury into one that satisfies the statutory material

¹⁰³ *Angus Chemical Co. v. United States*, 140 F.3d 1478, 1484-85 (Fed. Cir. 1998) (“{T}he statute does not ‘compel the commissioners’ to employ {a particular methodology}.”), *aff’g*, 944 F. Supp. 943, 951 (Ct. Int’l Trade 1996).

¹⁰⁴ The Federal Circuit, in addressing the causation standard of the statute, observed that “{a}s long as its effects are not merely incidental, tangential, or trivial, the foreign product sold at less than fair value meets the causation requirement.” *Nippon Steel Corp. v. USITC*, 345 F.3d 1379, 1384 (Fed. Cir. 2003). This was further ratified in *Mittal Steel Point Lisas Ltd. v. United States*, 542 F.3d 867, 873 (Fed. Cir. 2008), where the Federal Circuit, quoting *Gerald Metals, Inc. v. United States*, 132 F.3d 716, 722 (Fed. Cir. 1997), stated that “this court requires evidence in the record ‘to show that the harm occurred “by reason of” the LTFV imports, not by reason of a minimal or tangential contribution to material harm caused by LTFV goods.’” *See also Nippon Steel Corp. v. United States*, 458 F.3d 1345, 1357 (Fed. Cir. 2006); *Taiwan Semiconductor Industry Ass’n v. USITC*, 266 F.3d 1339, 1345 (Fed. Cir. 2001).

injury threshold.¹⁰⁵ In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.¹⁰⁶ Nor does the “by reason of” standard require that unfairly traded imports be the “principal” cause of injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry.¹⁰⁷ It is clear that the existence of injury caused by other factors does not compel a negative determination.¹⁰⁸

¹⁰⁵ SAA at 851-52 (“{T}he Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.”); S. Rep. 96-249 at 75 (1979) (the Commission “will consider information which indicates that harm is caused by factors other than less-than-fair-value imports.”); H.R. Rep. 96-317 at 47 (1979) (“in examining the overall injury being experienced by a domestic industry, the ITC will take into account evidence presented to it which demonstrates that the harm attributed by the petitioner to the subsidized or dumped imports is attributable to such other factors;” those factors include “the volume and prices of nonsubsidized imports or imports sold at fair value, contraction in demand or changes in patterns of consumption, trade restrictive practices of and competition between the foreign and domestic producers, developments in technology and the export performance and productivity of the domestic industry”); *accord Mittal Steel*, 542 F.3d at 877.

¹⁰⁶ SAA at 851-52 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports.”); *Taiwan Semiconductor Industry Ass’n*, 266 F.3d at 1345 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports Rather, the Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.” (emphasis in original)); *Asociacion de Productores de Salmon y Trucha de Chile AG v. United States*, 180 F. Supp. 2d 1360, 1375 (Ct. Int’l Trade 2002) (“{t}he Commission is not required to isolate the effects of subject imports from other factors contributing to injury” or make “bright-line distinctions” between the effects of subject imports and other causes.); *see also Softwood Lumber from Canada*, Inv. Nos. 701-TA-414 and 731-TA-928 (Remand), USITC Pub. 3658 at 100-01 (Dec. 2003) (Commission recognized that “{i}f an alleged other factor is found not to have or threaten to have injurious effects to the domestic industry, *i.e.*, it is not an ‘other causal factor,’ then there is nothing to further examine regarding attribution to injury”), *citing Gerald Metals*, 132 F.3d at 722 (the statute “does not suggest that an importer of LTFV goods can escape countervailing duties by finding some tangential or minor cause unrelated to the LTFV goods that contributed to the harmful effects on domestic market prices.”).

¹⁰⁷ S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

¹⁰⁸ *See Nippon Steel Corp.*, 345 F.3d at 1381 (“an affirmative material-injury determination under the statute requires no more than a substantial-factor showing. That is, the ‘dumping’ need not be the sole or principal cause of injury.”).

Assessment of whether material injury to the domestic industry is “by reason of” subject imports “does not require the Commission to address the causation issue in any particular way” as long as “the injury to the domestic industry can reasonably be attributed to the subject imports.”¹⁰⁹ The Commission ensures that it has “evidence in the record” to “show that the harm occurred ‘by reason of’ the LTFV imports,” and that it is “not attributing injury from other sources to the subject imports.”¹¹⁰ The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed “rigid adherence to a specific formula.”¹¹¹

The question of whether the material injury threshold for subject imports is satisfied notwithstanding any injury from other factors is factual, subject to review under the substantial evidence standard.¹¹² Congress has delegated this factual finding to the Commission because of the agency’s institutional expertise in resolving injury issues.¹¹³

¹⁰⁹ *Mittal Steel*, 542 F.3d at 876 & 78; *see also id.* at 873 (“While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured ‘by reason of’ subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology.”) *citing United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75. In its decision in *Swiff-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission’s causation analysis as comporting with the Court’s guidance in *Mittal*.

¹¹⁰ *Mittal Steel*, 542 F.3d at 873 (quoting from *Gerald Metals*, 132 F.3d at 722), 877-79. We note that one relevant “other factor” may involve the presence of significant volumes of price-competitive nonsubject imports in the U.S. market, particularly when a commodity product is at issue. In appropriate cases, the Commission collects information regarding nonsubject imports and producers in nonsubject countries in order to conduct its analysis.

¹¹¹ *Nucor Corp. v. United States*, 414 F.3d 1331, 1336, 1341 (Fed. Cir. 2005); *see also Mittal Steel*, 542 F.3d at 879 (“*Bratsk* did not read into the antidumping statute a Procrustean formula for determining whether a domestic injury was ‘by reason’ of subject imports.”).

¹¹² We provide in our discussion below a full analysis of other factors alleged to have caused any material injury experienced by the domestic industry.

¹¹³ *Mittal Steel*, 542 F.3d at 873; *Nippon Steel Corp.*, 458 F.3d at 1350, *citing U.S. Steel Group*, 96 F.3d at 1357; S. Rep. 96-249 at 75 (“The determination of the ITC with respect to causation is ... complex and difficult, and is a matter for the judgment of the ITC.”).

B. Conditions of Competition and the Business Cycle

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

1. Demand Conditions

PFFs are generally used to organize U.S. letter- and legal-sized documents in professional and home office settings.¹¹⁴ U.S. demand for PFFs is driven by overall economic activity, white collar employment, and office occupancy rates.¹¹⁵ One U.S. producer and two responding U.S. importers indicated that the U.S. market for PFFs was subject to business cycles, with demand for PFFs increasing from February to July ahead of the start of the schoolyear, and from September to October ahead of tax filing season.¹¹⁶

Most responding U.S. producers and importers reported that demand for PFFs declined during the POI.¹¹⁷ The parties generally agree that the COVID-19 pandemic caused a decline in demand for PFFs as lockdowns and stay-at-home orders were issued in the second and third quarters of 2020, although they disagree about the extent to which this decline abated towards the end of the POI.¹¹⁸ The parties also generally agree that environmental concerns and the

¹¹⁴ CR/PR at II-1; Conf. Tr. at 86 (Roberts). Most responding U.S. producers and importers reported that poly folders are substitutes for PFFs. CR/PR at II-7-II-8.

¹¹⁵ CR/PR at II-7.

¹¹⁶ CR/PR at II-6-II-7. *See also* Staples Coalition's Postconf. Br., Exh. 6 at 5; Target's Postconf. Br. at 10-11.

¹¹⁷ CR/PR at Table II-4.

¹¹⁸ *Compare* Conf. Tr. at 22-23 (Roberts) (indicating that the pandemic "finally receded" towards the end of the POI) *with* Staples Coalition's Postconf. Br. at 6-7 (indicating that the pandemic's impacts on the work environment, namely shortened in-office work-weeks and increased work-from-home days, have "continued to this day"). We will further examine this issue and other factors impacting demand in any final phase of these investigations.

digitization of office records have impacted demand for PFFs, although they disagree about the extent to which these factors reduced demand during the POI.¹¹⁹

The record indicates that apparent U.S. consumption of PFFs declined irregularly during the POI, from *** PFFs in 2019 to *** PFFs in 2020 and *** PFFs in 2021, a level *** percent lower than in 2019. It was *** PFFs in interim 2022, up *** from *** PFFs in interim 2021.¹²⁰

2. Supply Conditions

The domestic industry was the largest source of PFFs in the U.S. market throughout the POI. The industry's share of apparent U.S. consumption, by quantity, increased from *** percent in 2019 to *** percent in 2020 and *** percent in 2021; it was *** percent in interim 2022, down from *** percent in interim 2021.¹²¹

The domestic industry for purposes of these preliminary determinations consists of the two responding U.S. producers and petitioners, Smead and TOPS.¹²² The domestic industry underwent several changes during the POI, including plant closures, prolonged shutdowns/curtailments, and certain *** investments.¹²³ Smead also reported that it closed a PFF production facility in Reynosa, Mexico in 2020, and reshored this nonsubject production across its various domestic PFF production facilities.¹²⁴

¹¹⁹ Compare Staples Coalition's Postconf. Br. at 8 (arguing that environmental conservatism has moved in tandem with digitalization to "rapidly overtake{...} reliance on" PFFs) with Conf. Tr. at 84 (Avent), 152 (Vaughn) (characterizing these factors as "long-term demand" trends).

¹²⁰ CR/PR at Table IV-8.

¹²¹ CR/PR at Tables IV-9, C-1.

¹²² CR/PR at Table III-1. A third firm, ***, filed a partially completed questionnaire response. It estimated that it produced *** folders in 2021, and indicated that it supports the petitions. *Id.* at III-1 n.1.

¹²³ CR/PR at Table III-3.

¹²⁴ Conf. Tr. at 27 (Avent).

The domestic industry's installed overall capacity declined during the POI, from *** folders in 2019 and 2020 to *** folders in 2021. It was *** folders in interim 2021 and interim 2022.¹²⁵ The domestic industry's reported practical capacity, meaning the level of production the industry could reasonably have expected to attain with its actual employment levels and raw material supply, also declined during this period, from *** folders in 2019 to *** folders in 2020 and *** folders in 2021. It was *** folders in interim 2022, down from *** folders in interim 2021.¹²⁶ According to Petitioner, the domestic industry experienced an "unusual{ly} rapid turnover of personnel due in large part to COVID-19."¹²⁷

Subject imports were the third-largest source of PFFs throughout the POI. Cumulated subject imports as a share of apparent U.S. consumption, by quantity, increased throughout the POI, from *** percent in 2019 to *** percent in 2020 to *** percent in 2021. It was *** percent in interim 2022, up from *** percent in interim 2021.¹²⁸

Nonsubject imports were the second-largest source of PFFs throughout the POI. Nonsubject imports as a share of apparent U.S. consumption, by quantity, declined throughout the POI, from *** percent in 2019 to *** percent in 2020 and *** percent in 2021. It was *** percent in interim 2022, down from *** percent in interim 2021.¹²⁹ U.S. imports from Mexico accounted for over *** of total U.S. imports and *** nonsubject imports during the POI, and

¹²⁵ CR/PR at Table III-4.

¹²⁶ CR/PR at Table III-4.

¹²⁷ Petitioner's Postconf. Br., Exh. 1 at 22-23.

¹²⁸ CR/PR at Tables IV-9, C-1.

¹²⁹ CR/PR at Tables IV-9, C-1.

were primarily imported by U.S. importer *** and domestic producers from their production operations in Mexico.¹³⁰

One U.S. producer and two of six importers reported experiencing supply constraints during the POI, which responding firms attributed to supply chain challenges caused by the COVID-19 pandemic.¹³¹ In any final phase of these investigations, we intend to further investigate the effects of these supply constraints on the U.S. market, including any effects these factors may have had on the domestic industry's market share and how rapidly the industry could have increased its practical capacity.¹³²

3. Substitutability and Other Conditions

Based on the record in the preliminary phase of these investigations, we find that there is a high degree of substitutability between domestically produced PFFs and subject imports.¹³³ As discussed above, domestically produced PFFs and subject imports were sold in overlapping forms throughout the POI, and both U.S. producers and all responding U.S. importers reported that domestic and subject PFFs are always interchangeable.¹³⁴ Moreover, both U.S. producers and most responding U.S. importers reported that differences other than price were sometimes or never significant purchasing factors.¹³⁵

¹³⁰ CR/PR at I-3, IV-2, IV-7 n.11.

¹³¹ CR/PR at II-6.

¹³² The parties disagree on the domestic industry's capability to supply the U.S. market. Petitioner argues that the industry could have produced more PFFs during the POI and is capable of supplying the entire market. *See* Conf. Tr. at 42 (Beckman), 105-106 (Avent; Baird; Roberts). Respondents contend that labor shortages and logistical challenges have prevented domestic producers from supplying the market. *See* Staples Coalition's Postconf. Br. at 7-10, 17-19, Exhs. 1-2, 5.

¹³³ CR/PR at II-8.

¹³⁴ *See* Section VI.B. above.

¹³⁵ CR/PR at Tables II-7-II-8. The parties disagree on whether certain factors limited interchangeability during the POI, namely whether the domestic industry was capable of supplying the (Continued...)

We also find that price is an important factor in purchasing decisions, although there are other important factors. Both responding purchasers identified quality and cost as major purchasing factors. One firm each reported Forest Stewardship Council certification, supply chain visibility, ability to deliver quantities needed in requested timeframes, and strategic partnership with vendors, as other important factors.¹³⁶

U.S. producers reported different practices with respect to whether they produce PFFs to order or ship from inventory, with *** primarily producing PFFs to order and *** primarily selling PFFs from inventory.¹³⁷ On a weighted average basis, *** percent of U.S. producers' commercial shipments were shipped from inventory, with an average lead time of *** days, and the remaining *** percent were produced-to-order, with an average lead time of *** days.¹³⁸ Data on subject import lead times were not reported as U.S. importers are generally retailers that report their shipments as internal consumption.¹³⁹ With respect to selling methods, domestic and subject imported PFFs are sold predominantly under annual contracts, though some importers also reported using short-term contracts.¹⁴⁰

(...Continued)

hundreds to thousands of retailer-specific SKUs in the U.S. market. *Compare* Conf. Tr. at 42 (Beckman), 105-106 (Avent; Baird; Roberts) *with* Staples Coalition's Postconf. Br. at 7-10, Exhs. 1-2, Exh. 6 at 3. In any final phase of these investigations, we intend to further investigate the extent to which such limitations, as well as supply constraints, may have affected the degree of substitutability between domestically produced PFFs and subject imports.

¹³⁶ CR/PR at II-8.

¹³⁷ *** reported that *** percent of its U.S. shipments were produced-to-order with lead times of *** days with the remaining *** percent sold from inventory with lead times of ***, whereas *** reported that *** percent of its U.S. shipments were sold from inventory with lead times of *** days, with the remaining *** percent produced-to-order, with lead times of *** days. CR/PR at II-9.

¹³⁸ CR/PR at II-9 n.12 and *derived from* U.S. producers' questionnaire responses at IV-8.

¹³⁹ CR/PR at II-9.

¹⁴⁰ CR/PR at Table V-1.

The parties generally agree that large purchasers split their PFF purchases between branded PFFs and PFFs for sale to end-use customers under their private labels.¹⁴¹ The parties also generally agree that the COVID-19 pandemic caused supply chain disruptions, including production shutdowns, shipping container delays, increased freight costs, and congestion and delays at U.S. ports. However, they disagree about the duration of these disruptions, with Petitioner claiming that such disruptions have eased while respondents claim that they largely continue.¹⁴²

The primary raw material used to produce PFFs is rolls of uncoated freesheet paper.¹⁴³ Raw materials as a share of the domestic industry's cost of goods sold ("COGS") declined irregularly during the POI, from *** percent in 2019 to *** percent in 2019 and *** percent in 2020; the share was *** percent in interim 2022, down from *** percent in interim 2020.¹⁴⁴ Overall, prices of 20-pound uncoated freesheet copy paper and 50-pound offset rolls increased from January 2019 to October 2022.¹⁴⁵ Although the parties generally agree that the North American paper market is in secular decline, respondents claim that the decline has affected the domestic industry's access to raw materials while Petitioner maintains that the industry has access to sufficient supplies of paper.¹⁴⁶

¹⁴¹ Conf. Tr. at 29-30 (Avent); Staples Coalition's Postconf. Br., Exh. 7 at 3-4.

¹⁴² *Compare* Conf. Tr. at 22-23 (Roberts) *with* Staples Coalition's Postconf. Br. at 7, 17-19, Exh. 5; Target's Postconf. Br. at 10-13. We intend to further investigate the impact of the COVID-19 pandemic on the U.S. market for PFFs in any final phase of these investigations.

¹⁴³ CR/PR at V-1. Other components include paperboard, metals, and plastics. *Id.* at Table VI-4.

¹⁴⁴ CR/PR at V-1.

¹⁴⁵ CR/PR at V-1.

¹⁴⁶ *Compare* Conf. Tr. at 84 (Avent) (indicating that paper mills in the United States estimate that production of the grades of paper sourced by domestic producers will decline annually by two to three percent) *with* Staples Coalition's Postconf. Br. at 13-15 *and* Target's Postconf. Br. at 10-13, Exhs. 2-3 (Continued...)

Imports of PFFs from China entering under HTS subheading 4820.30.00 became subject to additional 10 percent *ad valorem* duties pursuant to section 301, which took effect on September 24, 2018. Effective May 10, 2019, these duties were increased to 25 percent.¹⁴⁷

C. Volume of Subject Imports

Section 771(7)(C)(i) of the Tariff Act provides that the “Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant.”¹⁴⁸

Cumulated subject imports increased irregularly during the POI. They declined from *** folders in 2019 to *** folders in 2020, then increased to *** folders in 2021, a level *** percent higher than in 2019. They were 246.5 percent higher in interim 2022, at *** folders, than in interim 2021, at *** folders.¹⁴⁹

As discussed above, cumulated subject imports also increased as a share of apparent U.S. consumption during the POI. Cumulated subject import market share, by quantity,

(...Continued)

(indicating that the closure of Resolute Forest Product’s Calhoun, Tennessee, paper production facilities in 2021 caused an acute shortage of raw materials in the PFF market). In any final phase of these investigations, we intend to further investigate the extent to which declining North American paper production has impacted the domestic industry’s production of PFFs.

¹⁴⁷ CR/PR at I-7.

¹⁴⁸ 19 U.S.C. § 1677(7)(C)(i).

¹⁴⁹ CR/PR at Table IV-2. Monthly official import data indicate that cumulated subject import volume remained elevated during the July-September 2022 period, at 17.5 million pounds, compared to July-September 2021, at 8.2 million pounds. CR/PR at Table IV-8. Although these data are overstated by the inclusion of out-of-scope merchandise, as discussed in section II.C above, they are consistent with importer questionnaire data indicating that responding U.S. importers had arranged for a substantial volume of subject imports, *** folders, in the third quarter of 2022. *See id.* at Table VII-23.

increased from *** percent in 2019 to *** percent in 2020 and *** percent in 2021. It was *** percent in interim 2022, up from *** percent in interim 2021.¹⁵⁰

We conclude that the volume of subject imports was significant over the POI, both in absolute terms and relative to apparent U.S. consumption, and that the increase in subject import volume in interim 2022 compared to interim 2021 was significant, both in absolute terms and relative to apparent U.S. consumption.

D. Price Effects of the Subject Imports

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

- (I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and
- (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.¹⁵¹

As discussed in section VII.B.3 above, the record indicates that there is a high degree of substitutability between domestically produced PFFs and the subject merchandise, and that price is an important factor in purchasing decisions, among other important factors.¹⁵²

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of three pricing products sold at arm's length to unrelated U.S. customers during the first quarter of 2019 through the second quarter of 2022.¹⁵³ Firms

¹⁵⁰ CR/PR at Table IV-9.

¹⁵¹ 19 U.S.C. § 1677(7)(C)(ii).

¹⁵² See Section VII.B.3 above.

¹⁵³ CR/PR at V-2-V-4. The three pricing products were as follows:

(Continued...)

that imported subject merchandise for their own use, repacking, and/or retail sale were requested to provide import purchase cost data. Two U.S. producers provided usable pricing data for sales of the requested products, although not all firms reported pricing data for all products for all quarters. Pricing data reported by these firms accounted for approximately *** percent of the value of U.S. producers' U.S. commercial shipments of PFFs during the POI. No importer provided usable pricing data. However, two importers provided usable purchase cost data. Purchase cost data reported by these firms accounted for *** percent of the value of imports from China and *** percent of the value of imports from Vietnam.¹⁵⁴

(...Continued)

Product 1. – Box of 100 file folders, each folder made from a single piece of paperboard folded along a primary score line that creates a front flap and a back flap. The paperboard is made from uncoated freesheet paper, manila in color, with a thickness of 11 points, a 105 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste. Each file folder is letter size and will have an extended paper tab on the back flap visible above the height of the front flap for labeling. Each file folder will have one 1/3 cut size tab in one of three positions (left, center, right);

Product 2. – Box of 25 hanging file folders, each folder made from a single piece of paperboard folded along a primary score line that creates a front flap and a back flap. The paperboard is made from uncoated freesheet paper, standard green in color, with a thickness of 11 points and a 126 to 144 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis). Each hanging file folder is letter size and will have a metal rod with small indentations or hooks on the end, and the ends of the rods will be coated. The box will contain 25 plastic tabs, each of which is 1/5 cut size, along with 25 white paper inserts; and

Product 3.—Box of 50 fastener folders, each folder made from a single piece of paperboard folded along a primary score line that creates a front flap and a back flap. The paperboard is made from uncoated freesheet paper, manila in color, with a thickness of 11 points, a 124 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 10 percent recycled post-consumer waste. Each fastener folder will be letter size and will come with two embedded 2 inch fasteners stamped into the material. Each fastener folder will have an extended reinforced paper tab on the back flap visible above the height of the front flap for labeling. Each fastener folder will have one 1/3 reinforced tab in one of three positions (left, center, right). *Id.* at V-3.

¹⁵⁴ With respect to imports from India, the responding U.S. importers reported only *** of purchase cost data for pricing product 1 and no data for products 2 and 3. CR/PR at V-4 n.10. We acknowledge that the pricing data coverage in these preliminary phase investigations is limited. We invite interested parties to comment on how best to improve the coverage of the pricing data, including (Continued...)

According to these pricing and purchase cost data, landed duty-paid costs for cumulated subject imports were below the sales prices of the domestic like product in *** of *** quarterly comparisons (*** percent of quarterly comparisons) involving *** boxes at price-cost differentials ranging from *** percent to *** percent and averaging *** percent. Landed duty-paid costs for cumulated subject imports were above the sales prices of the domestic like product in the remaining *** quarterly comparisons (*** percent of quarterly comparisons) involving *** boxes at price-cost differentials ranging from *** percent to *** percent and averaging *** percent. Quarters in which landed duty-paid costs for cumulated subject imports were below the sales prices of the domestic like product accounted for a substantial portion, *** percent, of reported subject import purchase cost data by volume.¹⁵⁵ Moreover, data for interim 2022 show relatively large quantities of subject imports whose landed duty-paid costs were below the sales prices of the domestic like product.¹⁵⁶

We recognize that the import purchase cost data may not reflect the total cost of importing and therefore requested that importers provide additional information regarding the costs and benefits of importing PFFs themselves. Both responding importers reported incurring additional costs beyond the landed duty-paid costs associated with importing PFFs, including

(...Continued)

proposed revisions to existing pricing products and/or additional pricing products, in their comments on the draft questionnaires in any final phase of these investigations.

¹⁵⁵ CR/PR at Table V-7.

¹⁵⁶ The largest quantities of subject imports for each pricing product were reported in interim 2022 at landed duty-paid values below the sales prices of the domestic product. See CR/PR at Tables V-2 – V-4. *** boxes of *** total subject imports in the purchase-cost data (*** percent) were reported for interim 2022, with *** boxes of subject imports in interim 2022 at lower landed duty-paid values than sales of the domestic product, representing *** percent of total subject imports in the purchase-cost data. *Derived from* Tables V-2-V-4.

demurrage charges, overseas costs, inventory carrying costs, and employee costs.¹⁵⁷ One responding importer estimated that its additional costs, consisting of demurrage charges, were equivalent to 2.8 percent of the landed duty-paid value of its imports for retail sale.¹⁵⁸ Although these additional costs amounted to less than the average price-cost differential of *** percent, this importer reported that the cost of importing PFFs itself, inclusive of such costs, were higher than the cost of purchasing PFFs domestically due to rising transportation costs caused by prevailing supply chain disruptions; the other importer reported that direct import costs were lower inclusive of additional costs.¹⁵⁹

Purchaser questionnaire responses also indicate that cumulated subject imports were being sold at lower prices than the domestic like product during the POI. Both responding purchasers reported that subject import prices were lower than the prices of domestically produced PFFs and that price was a primary reason for purchasing *** subject imported folders instead of the domestic like product, equivalent to *** percent of their imports and purchases of PFFs from subject sources during the period.¹⁶⁰

Given the high degree of substitutability between subject imports and the domestic like product, the importance of price in purchasing decisions, and the available record evidence

¹⁵⁷ CR/PR at V-4.

¹⁵⁸ CR/PR at V-4. The other responding importer did not provide an estimate of its additional charges as a share of the landed duty-paid value of its direct imports. *Id.* In determining whether to directly import PFFs, one responding importer reported that it compares the costs of importing directly to the cost of purchasing from a U.S. producer; the other responding importer reported that it compares the costs of importing directly to purchasing from both U.S. producers and importers. *Id.*

¹⁵⁹ CR/PR at V-5.

¹⁶⁰ CR/PR at Tables V-8-9. Respondents argue that confirmed lost sales reflect purchases of subject imports that replaced nonsubject imported PFFs sourced from the domestic producers' related operations in Mexico, not domestically-produced PFFs. Staples' Postconf. Br. at 10-13, Exh. 2 (Young Aff.) at 2-3, Exh. 7 at 7; Target's Postconf. Br. at 123 n.37. We intend to further investigate this issue in any final phase of these investigations.

regarding the lower cost of imports for internal use and retail sale as well as lost sales, we find that there has been significant price underselling of the domestic like product by subject imports during the POI. We further find that underselling by subject imports led to the *** percentage point shift in market share from the domestic industry to subject imports in interim 2022 compared to interim 2021.^{161 162}

We have also considered price trends during the POI. The pricing data indicate that prices for domestically produced PFFs fluctuated before increasing towards the end of the POI.¹⁶³ Domestic producer sales prices for pricing products 1 and 2, which accounted for most domestic pricing product sales volume, increased by *** and *** percent, respectively, over the POI; they declined by *** percent for pricing product 3, which was the lowest-volume domestic pricing product.¹⁶⁴ Subject landed duty-paid purchase costs increased by *** percent over the POI for subject imports of pricing product 1.¹⁶⁵

We have also examined whether subject imports prevented price increases which otherwise would have occurred. The domestic industry's COGS to net sales ratio increased throughout the POI, from *** percent in 2019 to *** percent in 2020 and *** percent in 2021, a level *** percentage points higher than in 2019. The industry's COGS to net sales ratio was

¹⁶¹ CR/PR at Tables IV-9, C-1.

¹⁶² While Commissioner Karpel finds that underselling led to a shift in market share from the domestic industry to subject imports in interim 2022 compared to interim 2021, she intends to investigate further in any final phase of these investigations the extent of that shift.

¹⁶³ See CR/PR at Figures V-1-3.

¹⁶⁴ CR/PR at Table V-5. Pricing product 1 accounted for *** percent of domestic pricing product sales volume, pricing product 2 accounted for *** percent, and pricing product 3 accounted for *** percent. *Id.*

¹⁶⁵ CR/PR at Table V-5. Purchase cost trends for subject imports could not be calculated for pricing products 2 and 3 as purchase cost data for these products did not span the entirety of the POI for any single country. *Id.* at V-12 n.13.

*** percent in interim 2022, up from *** percent in interim 2021.¹⁶⁶ The record indicates that, on a per-unit basis, the domestic industry faced rising raw material costs throughout the POI.¹⁶⁷ From 2019 to 2021, the increase in the domestic industry's unit COGS of *** percent outpaced the increase in its unit net sales value of *** percent, indicating that the industry experienced a cost-price squeeze during the period, although the *** percent decline in apparent U.S. consumption from 2019 to 2021 could have limited the domestic producers' ability to increase prices.¹⁶⁸ We therefore observe some evidence that cumulated subject imports may have suppressed domestic prices and intend to further examine this in any final phase of these investigations.¹⁶⁹

¹⁶⁶ CR/PR at Table VI-1.

¹⁶⁷ CR/PR at VI-12 and Tables VI-1-VI-2. On a per-unit basis (per 1,000 file folders), the domestic industry's raw material costs increased by \$*** (*** percent) from 2019 to 2020 and by \$*** (*** percent) from 2020 to 2021; they were \$*** (*** percent) higher in interim 2022 compared to interim 2021. CR/PR at Table VI-1.

¹⁶⁸ CR/PR at Tables IV-9, VI-2, C-1. The domestic industry's per-unit total COGS increased by \$*** (*** percent) from 2019 to 2020 and by \$*** (*** percent) from 2020 to 2021; it was \$*** (*** percent) higher in interim 2022 than in interim 2021. CR/PR at Tables VI-1-VI-2. The domestic industry's net sales unit value increased by \$*** (*** percent) from 2019 to 2020 and by \$*** (*** percent) from 2020 to 2021; it was \$*** (*** percent) higher in interim 2022 compared to interim 2021. *Id.*

Petitioner contends that due to certain characteristics of the PFF market, namely the commoditized nature of the product and the oligopsonistic behavior of purchasers, U.S. producers face downward pricing pressure whenever they are asked by purchasers to match low subject import prices. Petitioner's Postconf. Br. at 37-38, Exh. 26.

Information provided by *** indicates that U.S. producers successfully implemented numerous price increases after *** that increased domestic prices by *** percent towards the end of the POI compared to ***. CR/PR at V-17-V-18. However, *** also reports that it shifted its private label purchases to subject imports due to their lower costs and higher quality. Similarly, Indian producer and exporter *** claims that U.S. purchasers increasingly turned to subject imports from India due to the domestic industry's rising prices, slow deliveries, and lack of inventory. See EDIS Doc. No. 783428 (Oct. 31, 2022) at 2. In any final phase of these investigations, we intend to investigate further the factors that may have prevented domestic producers from increasing their prices to cover their rising costs.

¹⁶⁹ Commissioner Schmidlein does not join the observation that there is "some evidence" of price suppression as it unclear to her what that means under the applicable statutory provisions. She intends to investigate further in any final phase of these investigations whether subject imports prevented price increases that would have otherwise occurred.

In sum, based upon the record of the preliminary phase of these investigations, we find that cumulated subject imports significantly undersold the domestic like product, resulting in a shift in market share from the domestic industry to subject imports in interim 2022 relative to interim 2021. We therefore find that cumulated subject imports had significant price effects.

E. Impact of the Subject Imports¹⁷⁰

Section 771(7)(C)(iii) of the Tariff Act provides that the Commission, in examining the impact of the subject imports on the domestic industry, “shall evaluate all relevant economic factors which have a bearing on the state of the industry.” These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debt, research and development, and factors affecting domestic prices. No single factor is dispositive and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”¹⁷¹

The record shows that, from 2019 to 2021, the domestic industry’s output indicia were mixed, while its financial performance declined. This occurred as apparent U.S. consumption declined due to the COVID-19 pandemic in 2020, followed by a weak recovery in 2021. The domestic industry’s performance declined in interim 2022 compared to interim 2021 by nearly

¹⁷⁰ Commerce initiated its antidumping duty investigations on PFFs from China, India, and Vietnam based on estimated dumping margins ranging from 62.61 to 192.70 percent for subject imports from China, 86.01 to 225.24 percent for subject imports from India, and 180.61 to 233.93 percent for subject imports from Vietnam. 87 Fed. Reg. 67,441, 67,445 (Nov. 8, 2022).

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

every measure, however, as the industry lost *** percentage points of market share to low-priced subject imports.

The domestic industry's practical capacity and production generally declined during the POI, while capacity utilization increased from 2019 to 2021 and was lower in interim 2022 than in interim 2021. The domestic industry's practical production capacity declined from *** folders in 2019 to *** folders in 2020 and *** folders in 2021, a level *** percent lower than in 2019; it was *** folders in interim 2022 compared to *** folders in interim 2021. The domestic industry's production declined irregularly from 2019 to 2021, from *** folders in 2019 to *** folders in 2020 and *** folders in 2021, a level *** percent lower than in 2019; it was lower in interim 2022, at *** folders, than in interim 2021, at *** folders. Its capacity utilization increased irregularly from 2019 to 2021, declining from *** percent in 2019 to *** percent in 2020 before increasing to *** percent in 2021, a level *** percentage points higher than in 2019; it was lower in interim 2022, at *** percent, than in interim 2021, at *** percent.¹⁷²

The domestic industry's employment-related performance indicia were mixed during the POI. Employment in terms of the number of production and related workers ("PRWs") declined from 2019 to 2020 but increased in 2021 to a level higher than in 2019 and was the same in interim 2022 as in interim 2021.¹⁷³ Total hours worked increased from 2019 to 2021 but were lower in interim 2022 compared to interim 2021, while wages paid increased

¹⁷² CR/PR at Tables III-4, C-1.

¹⁷³ Employment declined from *** PRWs in 2019 to *** PRWs in 2020, then increased to *** PRWs in 2021; it was *** PRWs in interim 2021 and interim 2022. CR/PR at Tables III-12, C-1.

irregularly from 2019 to 2021 and were higher in interim 2022 compared to interim 2021.¹⁷⁴

Productivity declined throughout the POI.¹⁷⁵

The domestic industry's U.S. shipments declined from *** folders in 2019 to *** folders in 2020, then increased to *** folders in 2021, a level *** percent lower than in 2019; its U.S. shipments were *** in interim 2022, compared to *** folders in interim 2021.¹⁷⁶ As discussed above, the domestic industry's market share increased from *** percent in 2019 to *** percent in 2020 and *** percent in 2021, a level *** percentage points higher than in 2019; it was lower in interim 2022, at *** percent, than in interim 2021, at *** percent.¹⁷⁷

The domestic industry's end-of-period inventories declined throughout the POI, from *** folders in 2019 to *** folders in 2020 and *** folders in 2021, a level *** percent lower than in 2019; it was *** folders in interim 2022, compared to *** folders in interim 2021.¹⁷⁸ As a share of total shipments, the domestic industry's end-of-period inventories declined irregularly, from *** percent in 2019 to *** percent in 2020 and *** percent in 2021; it was lower interim 2022, at *** percent, than in interim 2021, at *** percent.¹⁷⁹

Virtually all of the domestic industry's financial performance indicia declined throughout the POI. The industry's total net sales revenues declined irregularly from \$*** in 2019 to \$***

¹⁷⁴ Total hours worked increased from *** hours in 2019 to *** hours in 2020 and *** hours in 2021; it was *** hours in interim 2022, which was lower than in interim 2021, at *** hours. CR/PR at Tables III-12, C-1. Wages paid increased irregularly, during the period, from \$*** in 2019 to \$*** in 2020 and \$*** in 2021; it was \$*** in interim 2022, which was higher than in interim 2021, at \$***. CR/PR at Tables III-12, C-1.

¹⁷⁵ Productivity declined from *** folders per hour in 2019 to *** folders per hour in 2020 and *** folders per hour in 2021; it was *** folders per hour in interim 2022, which was higher than in interim 2021, at *** folders. CR/PR at Tables III-12, C-1.

¹⁷⁶ CR/PR at Tables III-7, C-1.

¹⁷⁷ CR/PR at Tables IV-9, C-1.

¹⁷⁸ CR/PR at Tables III-8, C-1.

¹⁷⁹ CR/PR at Tables III-8, C-1.

in 2020 before increasing to \$*** in 2021, a level *** percent lower than in 2019; they were \$*** in interim 2022, up slightly from \$*** in interim 2021.¹⁸⁰ The industry's gross profits declined from \$*** in 2019 to \$*** in 2020 before increasing to \$*** in 2021, a level *** percent lower than in 2019; they were was \$*** in interim 2022, down from \$*** in interim 2021.¹⁸¹

The domestic industry's operating income, operating income margin, net income, and net income margin declined throughout the POI. The industry's operating income declined from \$*** in 2019 to \$*** in 2020 and \$*** in 2021, a level *** percent lower than in 2019; it was *** in interim 2022 compared to *** in interim 2021.¹⁸² As a ratio to net sales, the industry's operating income margin declined from *** percent in 2019 to *** percent in 2020 and *** percent in 2021; it was *** percent in interim 2022 compared to *** percent in interim 2021.¹⁸³ The industry's net income declined from \$*** in 2019 to \$*** in 2020 and \$*** in 2021, a level *** percent lower than in 2019; it was *** in interim 2022 compared to *** in interim 2021.¹⁸⁴ The industry's net income margin declined from *** percent in 2019 to *** percent in 2020 and *** percent in 2021; it was *** percent in interim 2022, compared to *** percent in interim 2021.¹⁸⁵ The domestic industry's return on assets also declined from *** percent in 2019 to *** percent in 2020, and *** percent in 2021.¹⁸⁶

¹⁸⁰ CR/PR at Tables VI-1, C-1.

¹⁸¹ CR/PR at Tables VI-1, C-1.

¹⁸² CR/PR at Tables VI-1, C-1.

¹⁸³ CR/PR at Tables VI-1, C-1.

¹⁸⁴ CR/PR at Tables VI-1, C-1.

¹⁸⁵ CR/PR at Tables VI-1, C-1.

¹⁸⁶ CR/PR at Table VI-10.

The domestic industry's capital expenditures increased irregularly from 2019 to 2021, declining from \$*** in 2019 to \$*** in 2020 before increasing to \$*** in 2021, but were lower in interim 2022, at \$***, than in interim 2021, at \$***.¹⁸⁷ The industry's research and development expenditures declined from 2019 to 2021, from \$*** in 2019 to \$*** in 2020 and \$*** in 2021, but were higher in interim 2022, at \$***, than in interim 2021, at \$***.¹⁸⁸ Lastly, both responding U.S. producers reported that subject imports had negative effects on investment, growth, and development.¹⁸⁹

Based on the record in the preliminary phase of these investigations, we find a causal link between increasing volumes of low-priced subject imports and the domestic industry's declining performance. Cumulated subject import volume was significant throughout the period of investigation and increased significantly in interim 2022 compared to interim 2021, as significant subject import underselling led to a *** percentage point shift in market share from the domestic industry to subject imports between the interim periods.¹⁹⁰ The domestic industry's loss of market share to subject imports caused declines in the industry's U.S. shipments and financial performance in interim 2022 compared to interim 2021.¹⁹¹

We are unpersuaded by respondents' argument that the increase in subject import volume was necessitated by the domestic industry's supply constraints, allegedly caused by

¹⁸⁷ CR/PR at Tables VI-5, C-1.

¹⁸⁸ CR/PR at Tables VI-7, C-1.

¹⁸⁹ CR/PR at Tables VI-13-VI-14.

¹⁹⁰ While Commissioner Karpel finds that underselling led to a shift in market share from the domestic industry to subject imports in interim 2022 compared to interim 2021, she intends to investigate further in any final phase of these investigations the extent of that shift.

¹⁹¹ Commissioner Kearns and Karpel observe there is some evidence that cumulated subject imports suppressed prices for the domestic like product, which may have also contributed to the industry's declining financial performance during the POI.

capacity limitations, labor and raw material shortages, and logistics disruptions.¹⁹² The record of the preliminary phase of these investigations indicates that the domestic industry's capacity utilization rate exceeded *** percent only in 2021, and that the industry possessed ample unused capacity in interim 2022, with a capacity utilization rate of *** percent and over *** folders in unused capacity, when cumulated subject imports increased significantly.¹⁹³ Moreover, the increase in the domestic industry's employment from 2020 to 2021 to the highest level of the POI, and the industry's stable level of employment in interim 2022 compared to interim 2021, do not suggest that the industry's production was substantially limited by labor shortages.¹⁹⁴ Nevertheless, we intend to further examine the extent to which supply constraints may have limited the domestic industry's ability to supply the market during the POI in any final phase of these investigations.

Nor are we persuaded by respondents' argument that the increase in cumulated subject import volume in interim 2022 reflected congestion at U.S. ports on the West Coast in 2021 caused by supply chain disruptions and the clearing of backlogs at these ports in interim 2022.¹⁹⁵ Monthly import data indicate that subject imports continued to enter the United States at elevated levels in the third quarter of 2022 relative to the third quarter of 2021, consistent with the substantial volume of subject imports reportedly arranged for the third

¹⁹² Staples Coalition's Postconf. Br. at 9-15.

¹⁹³ CR/PR at Tables III-4, C-1.

¹⁹⁴ CR/PR at Tables III-12, C-1.

¹⁹⁵ Staples Coalition's Postconf. Br., Exh. 6 at 1, Exh. 8, Responses of Thrasio to Staff Questions, at 2.

quarter of 2022.¹⁹⁶ These data suggest that elevated subject import levels were driven by factors other than the clearing of backlogs at U.S. ports.

We have also considered whether there are other factors that may have had an adverse impact on the domestic industry during the POI to ensure that we are not attributing injury from such other factors to subject imports. We recognize that declining apparent U.S. consumption in 2019 to 2020 and the weak recovery in apparent U.S. consumption thereafter may have limited the domestic industry's ability to increase its production and sales, and also the industry's ability to increase prices to cover rising costs. However, demand conditions do not explain the significant increase in low-priced subject imports in interim 2022.¹⁹⁷

Nor do nonsubject imports explain the domestic industry's declining performance. Unlike subject imports, nonsubject imports declined in terms of absolute volume between 2019 and 2021, and lost *** percentage points of market share over the period. Although nonsubject import volume was higher in interim 2022 than in interim 2021, nonsubject imports lost *** percentage points of market share to subject imports over the period.¹⁹⁸ We intend to further investigate how nonsubject imports from Mexico compete in the U.S. market, including those imported by domestic producers, in any final phase of these investigations.¹⁹⁹

In sum, based on the record of the preliminary phase of these investigations, we conclude that subject imports had a significant impact on the domestic industry.

¹⁹⁶ CR/PR at Tables IV-8, VII-23.

¹⁹⁷ CR/PR at Tables IV-9, VI-1, C-1.

¹⁹⁸ CR/PR at Tables IV-2, IV-9, C-1.

¹⁹⁹ We note that imports of PFF from Mexico accounted for a declining share of the market over the POI, and the average unit values ("AUVs") for U.S. importers' U.S. shipments of imports of PFF from Mexico were below the AUVs for importers' U.S. shipments of cumulated subject imports in every year of the POI and in the interim periods. CR/PR at Tables IV-2 and C-1.

VIII. Conclusion

For the reasons stated above, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of PFFs from China, India, and Vietnam that are allegedly sold in the United States at LTFV and imports of the subject merchandise from India that are allegedly subsidized by the government of India.

Part I: Introduction

Background

These investigations result from petitions filed with the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (“USITC” or “Commission”) by the Coalition of Domestic Folder Manufacturers, Hastings, Minnesota, and Naperville, Illinois on October 12, 2022, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized and less-than-fair-value (“LTFV”) imports of paper file folders¹ from China, India, and Vietnam. Table I-1 presents information relating to the background of these investigations.^{2 3}

**Table I-1
Paper file folders: Information relating to the background and schedule of this proceeding**

Effective date	Action
October 12, 2022	Petitions filed with Commerce and the Commission; institution of Commission investigations (87 FR 63526, October 19, 2022)
November 1, 2022	Commerce’s notice of initiation of its China, India, and Vietnam antidumping duty investigations (87 FR 67441, November 8, 2022), and its India countervailing duty investigation (87 FR 67447, November 8, 2022)
November 2, 2022	Commission’s conference
November 28, 2022	Commission’s vote
November 28, 2022	Commission’s determinations
December 5, 2022	Commission’s views

¹ See the section entitled “The subject merchandise” in Part I of this report for a complete description of the merchandise subject in this proceeding.

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

³ A list of witnesses who appeared at the conference is presented in appendix B of this report.

Statutory criteria

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

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

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

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

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

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

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

Organization of report

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

Market summary

Paper file folders are generally used to hold documents or other records for professional office or home office organization. The leading U.S. producers of paper file folders are Smead Manufacturing Company, Inc. (“Smead”) and TOPS Products LLC (“TOPS”), while leading producers of paper file folders outside the United States include *** in India, and *** in Vietnam. The leading U.S. importer of paper file folders from China is ***; the leading importers of paper file folders from India are ***; and the leading importers of paper file folders from Vietnam are ***. Leading importers of product from nonsubject countries (primarily Mexico) include ***. U.S. purchasers of paper file folders are large retailers; leading purchasers include ***.

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

Apparent U.S. consumption of paper file folders totaled *** folders (\$***) in 2021. Currently, three firms are known to produce paper file folders in the United States. U.S. producers' U.S. shipments of paper file folders totaled *** folders (\$***) in 2021 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. shipments of imports from subject sources totaled *** folders (\$***) in 2021 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. shipments of imports from nonsubject sources totaled *** folders (\$***) in 2021 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value.

Summary data and data sources

A summary of data collected in these investigations is presented in appendix C, table C-1. Except as noted, U.S. industry data are based on questionnaire responses of two firms that are believed to account for the vast majority of U.S. production of paper file folders during 2021.⁶ U.S. imports are based on questionnaire responses from nine firms and official import statistics from Commerce.

Previous and related investigations

Paper file folders have not been the subject of prior countervailing and antidumping duty investigations in the United States.

Nature and extent of alleged subsidies and sales at LTFV

Alleged subsidies

On November 8, 2022, Commerce published a notice in the Federal Register of the initiation of its countervailing duty investigation on paper file folders from India.⁷

⁶ Smead and TOPS reported that they accounted for between *** percent of U.S. production in 2021. Petition, Volume I, p. 5.

⁷ For further information on the alleged subsidy programs see Commerce's notice of initiation and related CVD Initiation Checklist. 87 FR 67447, November 8, 2022.

Alleged sales at LTFV

On November 8, 2022, Commerce published a notice in the Federal Register of the initiation of its antidumping duty investigations on paper file folders from China, India, and Vietnam.⁸ Commerce has initiated antidumping duty investigations based on estimated dumping margins of 62.61 percent to 192.70 percent for paper file folders from China; 86.01 percent to 225.24 percent for paper file folders from India; and 180.61 percent to 233.93 percent for paper file folders from Vietnam.

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:⁹

File folders consisting primarily of paper, paperboard, pressboard, or other cellulose material, whether coated or uncoated, that has been folded (or creased in preparation to be folded), glued, taped, bound, or otherwise assembled to be suitable for holding documents. The scope includes all such folders, regardless of color, whether or not expanding, whether or not laminated, and with or without tabs, fasteners, closures, hooks, rods, hangers, pockets, gussets, or internal dividers. The term "primarily" as used in the first sentence of this scope means 50 percent or more of the total product weight, exclusive of the weight of fasteners, closures, hooks, rods, hangers, removable tabs, and similar accessories, and exclusive of the weight of packaging.

Subject folders have the following dimensions in their folded and closed position: lengths and widths of at least 8 inches and no greater than 17 inches, regardless of depth.

The scope covers all varieties of folders, including but not limited to manila folders, hanging folders, fastener folders, classification folders, expanding folders, pockets, jackets, and wallets.

⁸ 87 FR 67441, November 8, 2022.

⁹ 87 FR 67441, November 8, 2022.

Excluded from the scope are:

- *mailing envelopes with a flap bearing one or more adhesive strips that can be used permanently to seal the entire length of a side such that, when sealed, the folder is closed on all four sides;*
- *binders, with two or more rings to hold documents in place, made from paperboard or pressboard encased entirely in plastic;*
- *non-expanding folders with a depth exceeding 2.5 inches and that are closed or closeable on the top, bottom, and all four sides (e.g., boxes or cartons);*
- *fashion folders, which are defined as folders with all of the following characteristics: (1) plastic lamination covering the entire exterior of the folder, (2) printing, foil stamping, embossing (i.e., raised relief patterns that are recessed on the opposite side), and/or debossing (i.e., recessed relief patterns that are raised on the opposite side), covering the entire exterior surface area of the folder, (3) at least two visible and printed or foil stamped colors other than the color of the base paper, and other than the printing of numbers, letters, words, or logos, each of which separately covers no less than 10 percent of the entire exterior surface area, and (4) patterns, pictures, designs, or artwork covering no less than thirty percent of the exterior surface area of the folder;*
- *portfolios, which are folders having (1) a width of at least 16 inches when open flat, (2) no tabs or dividers, and (3) one or more pockets that are suitable for holding letter size documents and that cover at least 15 percent of the surface area of the relevant interior side or sides; and*
- *report covers, which are folders having (1) no tabs, dividers, or pockets, and (2) one or more fasteners or clips, each of which is permanently affixed to the center fold, to hold papers securely in place.*

Tariff treatment

Harmonized Tariff Schedule of the United States (“HTS”) subheading 4820.30.00 covers binders (other than book covers), folders, and file covers of paper or paperboard. Paper File Folders, specifically, are currently imported under HTS statistical reporting number 4820.30.0040.¹⁰ The general rate of duty is “free” for HTS statistical reporting number 4820.30.0040.¹¹ Products described in HTS subheading 4820.30, including statistical reporting number 4820.30.0040, originating in China are subject to an additional 25 percent ad valorem duty under Section 301 of the Trade Act of 1974.¹² Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

The product¹³

Description and applications

File folders are a folded (or creased in preparation to be folded) product used mainly to hold documents or other records together for professional office or home office organization.¹⁴

¹⁰ This tariff classification includes products that are outside the scope of these investigations.

¹¹ See HTS (2022) Revision 11, Publication 5382, October 2022, p. 48-24.

¹² The U.S. Trade Representative imposed the tariffs under Section 301 of the Trade Act of 1974 after determining that certain acts, policies, and practices of China are unreasonable or discriminatory and burden or restrict U.S. commerce. 82 FR 40213, August 24, 2017 and 83 FR 14906, April 6, 2018). The products included in the third enumeration (“Tranche 3”) of goods produced in China are subject to additional Section 301 duties. Tranche 3 tariffs with a duty rate of 10 percent were put in place September 24, 2018 (83 FR 47974, September 21, 2018). On May 10, 2019, tranche 3 tariffs were increased to 25 percent ad valorem (84 FR 20459, May 9, 2019). If a Tranche 3 good was exported from China to the United States prior to May 10, 2019, and entered the United States prior to June 1, 2019, it was not subject to the escalated 25 percent duty (84 FR 21892, May 15, 2019). See HTS heading 9903.88.03 and U.S. notes 20 (e) and (f) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2022) Revision 11, Publication 5382, October 2022, pp. 99-III-26, 99-III-27, 99-III-40.

¹³ Unless otherwise noted, the information in this section is based on Petition, Vol. I, pp. 7-9, Response of Petitioner to Second Volume I Supplemental Questions, Exhibit I-2S1, p. 1-2, Petitioners’ postconference brief, Exhibit 1, pp. 20-22. The universe of paper file folders is extensive, and the discussion provided is not exhaustive.

¹⁴ Merriam-Webster.com Dictionary, (n.d.), “Folder,” <https://www.merriam-webster.com/dictionary/folder>, accessed November 5, 2022.

Paper file folders are primarily¹⁵ made of paper, paperboard, pressboard, or other cellulose material.¹⁶

Paper file folders can be glued, taped, bound, or otherwise assembled. They can also be coated or uncoated; laminated or not; expanding or not; or use fasteners, closures, hooks, rods, hangers, pockets, gussets, or internal dividers. They are folded to be opened on a least one side to allow for the insertion and removal of documents and other materials. They generally feature plain designs and colors.¹⁷

These products are usually designed to hold documents of the two primary paper sizes in North America: (1) letter size and (2) legal size.¹⁸ As such, these paper file folders, in their folded and closed position, have the following dimensions: lengths and widths of at least 8 inches and no greater than 17 inches, regardless of depth.

Paper file folders commonly feature some type of tab or label that allows one to identify the type of information contained within. These tabs can vary in placement and measurement but are usually top tabs or end tabs. The top tabs come in varied positions for ease of review when stored in a cabinet. End tabs are for vertical storage. The most common tab size is 1/3 (but can go to 1/12) of the folder's width, placed to the right, center, or left. Tabs are available reinforced or plain (not reinforced). Reinforced tabs are typically doubled in thickness for added

¹⁵ According to the Response of Petitioner to Second Volume I Supplemental Questions and Petitioner postconference brief, a paper file folder is paper-based for at least 50 percent of the total product weight, exclusive of the weight of fasteners, closures, hooks, rods, hangers, removable tabs, and similar accessories and exclusive of the weight of packaging. For example, there are also file folders made mostly of plastic materials like polypropylene, which, because they are not primarily made from paper, are not PFFs and are outside of the Scope.

¹⁶ Cellulose is a naturally occurring plant material. Cellulose. *Merriam-Webster.com Dictionary*, (n.d.), <https://www.merriam-webster.com/dictionary/cellulose>, accessed November 5, 2022.

¹⁷ According to the Response of Petitioner to Second Volume I Supplemental Questions, some folders, not commonly referred to as paper file folders, are known as "fashion folders," and are outside of the Scope. Fashion folders typically feature (1) plastic lamination covering the entire exterior of the folder, (2) printing, foil stamping, embossing (i.e., raised relief patterns that are recessed on the opposite side), and/or debossing (i.e., recessed relief patterns that are raised on the opposite side), (3) at least two visible and distinct printed or foil stamped colors other than the color of the base paper, and other than the printing of numbers, letters, words, or logos, each of which separately covers no less than 10 percent of the entire exterior surface area, and (4) elaborate designs and colors (such as patterns, pictures, designs, or artwork) covering no less than thirty percent of the exterior surface area of the folder.

¹⁸ The term "letter size" commonly refers to paper that is 8-½ inches wide and 11 inches long (216 mm x 279 mm). The term "legal size" commonly refers to paper that is 8-½ inches wide and 14 inches long (216 mm x 356 mm). Paper Sizes 2022, (n.d.) "US Paper Sizes," <https://www.papersizes.org/us-paper-sizes.htm>, accessed November 5, 2022.

durability. Users commonly write on the tab or use adhesive labels to categorize the paper file folder contents.

The type of paper file folder being used varies based on the filing system used in a specific office setting. Many users organize their filing systems based on the thickness of the document being filed.¹⁹ There are many types of paper file folders, including but not limited to manila folders, hanging folders, fastener folders, classification folders, expanding folders, pockets, jackets, and wallets.

Manila folders

Manila folders get their name from the fiber originally used, manila hemp or abaca in the Philippines (figure I-1).²⁰ These paper file folders are no longer plantain-based, they are commonly made instead from wood pulp fiber inputs. Manila folders are typically made with 11 point (pt.)²¹ paper (card stock²²) and available in buff or beige.

¹⁹ Petitioner, Postconference Brief, November 7, 2022, p. 6 and conference transcript, p. 41 (Beckman).

²⁰ Lui, Claire, April 2, 2021, "A Manila Envelope: The Inspiration behind an Exhibition's Graphic Identity," <https://www.guggenheim.org/blogs/checklist/a-manila-envelope-the-inspiration-behind-an-exhibitions-graphic-identity>.

²¹ Point (pt.) is a common paper and packaging measure of thickness. The thickness of the product is measured with each point representing 1/1000th of an inch. An 11-pt. paper is 11/1000ths of an inch in thickness. The thickness increases as the point value increases. GSM, grams per square meter, is another measure, using meters rather than inches. The thickness and weight increase as the GSM value increases. Point and GSM measurements cannot be converted, as GSM measures additional information (it measures weight and thickness). Iverson, Jana, September 23, 2021, "GSM vs PT Unit System: What is the Difference?," <https://pakfactory.com/blog/gsm-vs-pt-unit-system/>.

²² Card stock is a general term for heavy weight paper. It is thicker than writing paper, but thinner than paperboard. The Paper, (February 17, 2017), Paper 101, Paper Facts, "The Ultimate Guide to Card Stock: Part 1," <https://blog.thepapermillstore.com/ultimate-guide-to-card-stock/part-1-what-is-card-stock/>.

Figure I-1
Paper file folders: Manila folder



Source: TOPSTM Products. "Pendaflex® File Folders, Legal Size, Manila, 1/3 Cut, Center Position, 100/BX," <https://www.tops-products.com/pendaflexr-file-folders-legal-size-manila-1-3-cut-center-position-100-bx.html>, accessed November 5, 2022.

Hanging folders

Hanging folders are named as such because they hang from the rails found in some file cabinets, desktop hanging file frames, and other file storage options (figure I-2). These paper file folders include metal rods for hanging. Hanging folders are typically made with 11 pt. thick paper (card stock) and are available in a variety of colors (as an additional categorization feature to allow for color coding).

Figure I-2
Paper file folders: Hanging folders



Source: Smead Manufacturing Company, Inc., "FasTab® Hanging File Folders, 1/3-Cut Built-In Tab," <https://www.smead.com/products/fastab-hanging-file-folders-1-3-cut-built-in-tab?variant=42101669527723>, accessed November 5, 2022.

Fastener folders

Fastener folders are paper file folders that are intended to hold documents in place using flat prongs (figure I-3). Two metal fasteners are typically embossed or bonded (glued) and positioned at the end on the folder interior. Embossed prongs are threaded through the folder and are kept in place using smaller prongs. Bonded prongs are glued with an adhesive to the

folder surface. The documents would be hole-punched to thread the prongs to hold them in place. These prongs are typically 2- to 2.75 inches wide, with a 1- 2-inch capacity for holding documents. These paper file folders are generally made with 11 pt. thick paper (card stock). They are available in a variety of colors and card stocks (figure I-3 shows two options, including manila and kraft paper²³).

Figure I-3
Paper file folders: Fastener folders



Source: TOPSTM Products.(left) “Pendaflex® Manila Fastener Folders, Legal Size, 2 Fasteners, Straight Cut, 50/BX,” <https://www.tops-products.com/fastener-folder-2-fasteners-straight-manila-legal.html> and (right) “Pendaflex® Kraft Fastener Folders, Legal Size, 2 Fasteners, 1/3 Cut, 50/BX,” <https://www.tops-products.com/pendaflexr-kraft-fastener-folders-legal-size-kraft.html>, accessed November 7, 2022.

Classification folders

Classification folders are paper file folders that are intended to hold many documents related to a single topic (figure I-4). These paper file folders have dividers built in to allow organizing and sorting. They are generally made with 25 pt. thick paper (pressboard stock). They offer a range of dividers, with the most common between 1 and 4 dividers. Most feature a tear resistant gusset to allow expansion (range of this expansion is typically from 1- 5-inches). Metal prongs are inserted for each section to keep documents secure (see fastener folders, above). Classification folders come in a wide range of colors, to allow for color coding.

²³ Kraft paper is made with a particular wood pulp manufacturing process to ensure durability. PaperIndex Academy, (n.d.), “Kraft Paper Primer,” <https://www.paperindex.com/academy/paper-grades/kraft-paper-primer>, accessed November 7, 2022.

Figure I-4
Paper file folders: Classification folder



Source: Smead Manufacturing Company, Inc., "Pressboard Classification Folders, 2 Dividers, 2 inch Expansion, 2/5-Cut Tab," https://www.smead.com/products/pressboard-classification-folders-2-dividers-2-inch-expansion-2-5-cut-tab?_pos=3&_psq=pressboard+classification&_ss=e&_v=1.0, accessed November 5, 2022.

Expanding folders

Expanding folders are expandable paper file folders which are closed on three sides. The expansion adjusts in size based upon the contents and capacity, as they feature an accordion-like structure (figure I-5).²⁴ They are available in a variety of colors. Regardless of their external color, their construction is typically of 11 pt. card stock and reinforced with manila-lined fronts, backs, and gussets. These paper file folders are intended to hold bulk documents together and generally have a scored design so that the tops of the front and back fold down for access.

²⁴ According to the Response of Petitioner to Second Volume I Supplemental Questions, expanding folders that feature products that are not paper (such as those covered entirely with fabric, leather, or faux leather) on an outer surface (other than the gusset, handles, and/or closing mechanisms), are also not considered paper file folders and are outside of the scope of these investigations.

Figure I-5
Paper file folders: Expanding folder



Source: Office Depot, "Smead® Expanding File Pockets, 5 1/4" Expansion, 9 1/2" x 14 3/4", 30% Recycled, Redrope, Pack of 10," https://www.officedepot.com/a/products/808584/Smead-Expanding-File-Pockets-5-14/?utm_source=google&utm_medium=cpc&mediacampaignid=71700000094453789_17280504614&gclid=CjwKCAiA9qKbBhAzEiwAS4yeDZ_EO1ioDKnNU_PmKnL8zZXfSM4aGCpfjFzx2FigD-gBk5CFFyGdMxoCyllQAvD_BwE&gclid=aw.ds, accessed November 7, 2022.

Pocket folders

Pocket folders are paper file folders that are open on three sides and have one or two pockets on the inside (figure 1-6). They are intended to store small or loose items. They are typically made with 11 pt. thick paper (card stock) and are available in a variety of colors.

Figure I-6
Paper file folders: Pocket folder



Source: Smead Manufacturing Company, Inc., "End Tab Pocket Folders with Reinforced Tab," https://www.smead.com/products/end-tab-pocket-folders-with-reinforced-tab?_pos=1&_psq=end-tab+pocket-folders-with-reinforced+tab&_ss=e&_v=1.0, accessed November 7, 2022.

File jackets

File jackets are paper file folders that are closed on three sides with a straight-cut, reinforced tab (figure I-7). They are generally made with 11 pt. card stock and are available in a variety of colors. They are designed to slide into hanging folders to keep documents together,

but can be used outside of this application, based on user preference. These paper file folders are available in flat or with expansion capability to increase filing capacity.^{25, 26}

Figure I-7
Paper file folders: File jacket



Source: Smead Manufacturing Company, Inc., “Manila File Jackets, Flat-No Expansion, Straight-Cut Tab,” https://www.smead.com/products/manila-file-jackets-flat-no-expansion-straight-cut-tab?_pos=1&_psq=manila+file+jacket&_ss=e&_v=1.0, accessed November 7, 2022.

File wallets

File Wallets are paper file folders that are intended to protect documents while carrying. They are closed on three sides, are usually expandable (with accordion-type structure) and offer a top protective flap to keep documents inside (figure I-8). File wallets are designed to permit top tab file folders to fit inside. They are generally made with 11 pt. card stock and some are lined with tear-resistant material for added durability. Most come with an elastic cord or other fastener to keep them securely closed.²⁷

²⁵ In contrast to file jackets, report covers, which are excluded from the scope of these investigations, are folders having (1) no tabs, dividers, or pockets, and (2) one or more fasteners or clips, each of which is permanently affixed to the center fold, to hold papers security in place.

²⁶ In contrast to file jackets portfolios, which are excluded from the scope of these investigations, are folders having (1) a width of at least 16 inches when open flat, (2) no tabs or dividers, and (3) one or more pockets that are suitable for holding letter size documents and that cover at least 15 percent of the surface area of the relevant interior side or sides.

²⁷ Unlike file wallets, mailing envelopes have a flap bearing one or more adhesive strips that can be used permanently to seal the entire length of a side such that, when sealed, the folder is closed on all four sides. Mailing envelopes are excluded from the scope of these investigations.

Figure I-8
Paper file folders: File wallet



Source: Smead Manufacturing Company, Inc., “TUFF® Expanding Wallets, 5-1/4-Inch Expansion,” https://www.smead.com/products/tuff-expanding-wallets-5-1-4-inch-expansion?_pos=4&_psq=tuff+expanding&_ss=e&_v=1.0, accessed November 7, 2022.

Manufacturing processes

The manufacturing process for PFF products usually includes four steps: (1) setting up the paper at the beginning of the line; (2) using a die cutting machine to size and score the paper; (3) any finishing required to achieve the proper functionality for the item at issue; and (4) preparing the item for shipment. Domestic production is believed to be similar to that of foreign production.^{28,29}

Paper file folders are typically made using a wood pulp fiber-based material referred to as “Bristol paper,” which is commonly used in the manufacture of both these products and other select paper products.³⁰

In the first step of the manufacturing process for some paper file folders (such as manila folder, pocket folder, and file jacket), a roll of paper is set up at the beginning of the line. Second, the paper is run through a die cutting machine that die cuts the paper to the desired folder size and scores the resulting folders. Next, the folders are closed and passed through an automated packaging line where they are counted, stacked, and placed in a box bottom. The automated packaging line then places a box lid over the box bottom. The automated packaging

²⁸ “*** production process is similar to the production processes of the Chinese producers and is therefore representative for purposes of this petition.” Petition, Vol. II, p. 8.

²⁹ Petitioners note that the industry has not undergone any major manufacturing process innovation. Petitioners have invested in some improvements and manufacturing enhancements ***. Petitioner, Postconference brief, November 7, 2022, Exhibit 1, p. 18-19. Respondents also note that the industry has not had significant manufacturing process innovations in the last 10 years. However, respondents indicate that there have been some technological upgrades to improve production efficiency. Respondent, Postconference brief, November 7, 2022, Exhibit 6, p. 5-6.

³⁰ Petitioners’ postconference brief, p. 6. and White Birch Paper, (n.d.), “Bristol Paper,” <https://whitebirchpaper.com/products/bristol-paper/>, accessed November 8, 2022.

line stacks the folder boxes and places them in a shipping carton. The shipping carton is taped closed and stacked on a pallet.

The process for manufacturing hanging folders is similar to the paper file folders above, in that the first step of the manufacturing process includes setting up a roll of paper at the beginning of the line. The roll of paper runs through the line with the inside of the folder facing up. Glue is applied near the top edges of the paper. Second, steel hanging rods are placed at both ends of the paper on top of the glue line (which helps hold them in place), and the paper is then scored at the top edges of both panels and die cut to create multiple tab positions in the panels. Third, the top edges are folded over the hanging folder rods and sealed with glue. The hanging folder is then scored and folded closed. Fourth, the hanging folders pass through an automated packaging line where they are counted, stacked, and placed in a box bottom. A bag of tabs and paper inserts are automatically fed into the box and placed on top of the folders. The automated packaging line then places a box lid over the box bottom. The automated packaging line stacks the hanging folder boxes and places them in a shipping carton. The shipping carton is taped closed and stacked on a pallet.

In the first step of the manufacturing process for fastener folders, a roll of paper is set up at the beginning of the line. Second, the paper is run through a die cutter, which die cuts and scores one folder at a time. Third, the paper is run through a gluer to apply a spot of glue at the top edge before the top edge is folded over to create the reinforced tab. The folder is then folded closed and stacked at the end of the line. The folders are then transferred to a fastener line. The folder is fed through a fastener machine which opens the folder, places two fasteners at the top of the folder covers and then folded closed. Finally, the folders are counted, stacked, and placed in a box bottom. A box lid is placed over the box bottom. Boxes of fastener folders are stacked and placed in a shipping carton. The shipping carton is taped closed and stacked on a pallet.

In the first step of the manufacturing process for expanding folders, rolls of paper are set up at the beginning of the line. Second, one roll of paper runs through a die cutter with cutting dies that cut, score, and round the corners of one front or back cover for subassembly purposes. A second roll of paper is run through a gusset machine to apply reinforcing tape on the edge of the paper followed by the folding and cutting of the gusset. A third roll of paper is run through a gluer that folds the top edge of the paper and applies a spot of glue before the top edge is folded over to create the reinforced tabs, which are then cut by dies to into expanding file indexes, and information is printed on the index tabs. Third, the covers, gusset, and indexes are assembled, and then the front and back covers are glued to chipboards. The

expanding file folder then is compressed, shrink- wrapped, counted, and placed in a shipping carton. The shipping carton is taped closed and stacked on a pallet.

For each paper file folder product, packaging for shipment includes marking the product brand.³¹ Brands that are owned and marketed by producers are called “manufacturer brand” or “branded.” Brands that are owned and marketed by sellers are called “private label.” At that stage, the product box is labeled according to the product brand.

Domestic like product issues

The petitioner contends that there is a single like product covering all items under the scope of these investigations.³² Respondents Staples, Navneet Education Limited, Three-Color Stone Stationery Company Limited, and Thrasio LLC do not challenge the petitioner’s position but may raise domestic like product issues in any final phase investigation.³³ Respondent Target did not comment on the domestic like product definition in its postconference brief.

³¹ ***. Petitioner’s Post-Conference Brief, November 7, 2022, Exhibit 1, pp. 22.

³² Petitioner’s postconference brief, pp. 5 and 9.

³³ Respondents Staples, Navneet Limited, Three-Color Stationary Company, and Thrasio LLC’s postconference brief, p. 1.

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

U.S. market characteristics

Paper file folders are generally used to organize U.S. letter and legal-sized documents in home and office settings. As a consumer product, it is sold primarily through the retail channel, followed by the distribution channel. Retailers comprised the majority of responding importers in these investigations and are large purchasers of domestically produced paper file folders.¹ U.S. producers sell both branded and private label paper file folders to the major retailers.² Smead estimated that the private label business accounted for roughly half of all file folders sold in the United States in 2021.³ The market experienced a sharp decline in demand during the COVID-19 pandemic but has since seen some recovery in demand. All responding U.S. producers and importers reported that there have been no product changes since January 1, 2019.

Apparent U.S. consumption of paper file folders decreased during 2019-21. Overall, apparent U.S. consumption in 2021 was *** percent lower than in 2019. Apparent U.S. consumption was *** percent higher in January-June 2022 compared to January-June 2021.

Impact of section 301 tariffs

U.S. producers and importers were asked to report the impact of section 301 tariffs on overall demand, supply, prices, and raw material costs. Both U.S. producers and four of six responding importers reported that section 301 tariffs had an impact on the paper file folders market.⁴ Petitioner reported that they saw a decline in imports from China after the section 301 tariffs were imposed, but these imports are still present in the market. They also saw a rapid increase in import volumes from Vietnam and India.⁵ Importers described a resulting cost increase but reported that the market did not accept the price increase required to support purchasing at that cost. Importers *** found alternative sources for paper file folders.

¹ Conference transcript, p. 20 (Roberts).

² Conference transcript, pp. 29-30 (Avent), pp. 66-73 (Roberts, Taylor, Vaughn, Beckman, Avent, Garber).

³ Conference transcript, p. 30 (Avent).

⁴ One importer (***) report that section 301 tariffs had not had an impact on the paper file folders market and one importer (***) reported that it did not know.

⁵ Petitioner's postconference brief, Exhibit 1, pp. 16-17 and Exhibit 23 at 13.

Channels of distribution

U.S. producers sold mainly to ***, and responding importers ***, as shown in table II-1. Petitioner stated that there are ***.⁶

Table II-1
Paper file folders: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent

Source	Channel	2019	2020	2021	Jan-Jun 2020	Jan-Jun 2021
United States	Retailers	***	***	***	***	***
United States	Distributors	***	***	***	***	***
United States	End users	***	***	***	***	***
China	Retailers	***	***	***	***	***
China	Distributors	***	***	***	***	***
China	End users	***	***	***	***	***
India	Retailers	***	***	***	***	***
India	Distributors	***	***	***	***	***
India	End users	***	***	***	***	***
Vietnam	Retailers	***	***	***	***	***
Vietnam	Distributors	***	***	***	***	***
Vietnam	End users	***	***	***	***	***
Subject sources	Retailers	***	***	***	***	***
Subject sources	Distributors	***	***	***	***	***
Subject sources	End users	***	***	***	***	***
Mexico	Retailers	***	***	***	***	***
Mexico	Distributors	***	***	***	***	***
Mexico	End users	***	***	***	***	***
All other sources	Retailers	***	***	***	***	***
All other sources	Distributors	***	***	***	***	***
All other sources	End users	***	***	***	***	***
Nonsubject sources	Retailers	***	***	***	***	***
Nonsubject sources	Distributors	***	***	***	***	***
Nonsubject sources	End users	***	***	***	***	***
All import sources	Retailers	***	***	***	***	***
All import sources	Distributors	***	***	***	***	***
All import sources	End users	***	***	***	***	***

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

⁶ Petitioner's postconference brief, Exhibit 1, pp. 17-18.

Geographic distribution

U.S. producers and importers reported selling paper file folders to all regions in the United States (table II-2). For U.S. producers, *** percent of sales were within 100 miles of their production facility, *** percent were between 101 and 1,000 miles, and *** percent were over 1,000 miles. Because importers are generally retailers and their shipments are reported as internal consumption, no shipment distances were reported for commercial shipments.

Table II-2
Paper file folders: Count of U.S. producers' and U.S. importers' geographic markets

Region	U.S. producers	China	India	Vietnam	Subject sources
Northeast	2	4	4	2	5
Midwest	2	4	4	2	5
Southeast	2	4	4	2	5
Central Southwest	2	4	4	2	5
Mountain	2	4	4	2	5
Pacific Coast	2	4	4	2	5
Other	2	1	2	1	2
All regions (except Other)	2	4	4	2	5
Reporting firms	2	4	4	2	5

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

Note: Other U.S. markets include AK, HI, PR, and VI.

Supply and demand considerations

U.S. supply

Table II-3 provides a summary of the supply factors regarding paper file folders from U.S. producers and from subject countries. Generally, capacity utilization was high, inventories were low, and nearly all shipments of paper file folders went to the U.S. market from all sources.

Table II-3
Paper file folders: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Quantity in 1,000 folders; ratio and share in percent

Factor	Measure	United States	China	India	Vietnam	Subject Sources
Capacity 2019	Quantity	***	***	***	***	***
Capacity 2021	Quantity	***	***	***	***	***
Capacity utilization 2019	Ratio	***	***	***	***	***
Capacity utilization 2021	Ratio	***	***	***	***	***
Inventories to total shipments 2019	Ratio	***	***	***	***	***
Inventories to total shipments 2021	Ratio	***	***	***	***	***
Home market shipments 2021	Share	***	***	***	***	***
Non-US export market shipments 2021	Share	***	***	***	***	***
Ability to shift production (firms reporting “yes”)	Count	***	***	***	***	***

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

Note: Responding U.S. producers accounted for the vast majority of U.S. production of paper file folders in 2021. Responding foreign producer/exporter firms accounted for less than 25 percent of reported U.S. imports of paper file folders from China, all reported U.S. imports of paper file folders from India, and all reported U.S. imports of paper file folders from Vietnam during 2021. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Part I, “Summary Data and Data Sources.”

Domestic production

Based on available information, U.S. producers of paper file folders have the ability to respond to changes in demand with small changes in the quantity of shipments of U.S.-produced paper file folders to the U.S. market. The main contributing factors to this degree of responsiveness of supply is some ability to shift shipments from inventories. Factors mitigating responsiveness of supply include limited availability of unused capacity, limited ability to shift shipments from alternate markets, and limited ability to shift production to or from alternate products.

U.S. producers’ capacity *** while production ***, leading to an overall *** in capacity utilization during 2019-21. U.S. producers held inventories during the period, though those ***. U.S. producers export *** and neither reportedly can produce other products on the same equipment as paper file folders. U.S. producers did not elaborate on factors affecting their ability to shift production.

Subject imports from China

Based on available information, the sole responding producer of paper file folders from China, Ningbo Guangbo, would have the ability to respond to changes in demand with *** changes in the quantity of shipments of paper file folders to the U.S. market should it restart production. Factors mitigating responsiveness of supply include ***. Ningbo Guangbo reported that ***.

Subject imports from India

Based on available information, the sole producer of paper file folders from India, Navneet, has the ability to respond to changes in demand with *** changes in the quantity of shipments of paper file folders to the U.S. market. Factors mitigating responsiveness of supply include limited availability of unused capacity or inventories, limited ability to shift shipments from alternate markets or inventories. Navneet did report that it is able to shift production to or from alternate products.

Navneet's capacity and production *** during 2019-21, but as production *** capacity, capacity utilization *** from ***. Navneet reported limited shipments of paper file folders to its home or third-country markets. Other products that it reportedly can produce on the same equipment as paper file folders are ***. Factors affecting Navneet's ability to shift production include ***.

Subject imports from Vietnam

Based on available information, producers of paper file folders from Vietnam have the ability to respond to changes in demand with moderate-to-large changes in the quantity of shipments of paper file folders to the U.S. market. The main contributing factors to this degree of responsiveness of supply are primarily the ability to increase capacity and availability of unused capacity. Factors mitigating responsiveness of supply include limited ability to shift shipments from alternate markets or inventories and limited ability to shift production to or from alternate products.

There was no capacity or production by the two responding Vietnamese producers in 2019. These firms were able to quickly add capacity and production

*** by 2021. The Vietnamese producers reported limited shipments of paper file folders to its home or third-country markets and limited inventories. One of the two responding Vietnamese producers, ***, reported that it can shift production to other products, including ***. Factors affecting this foreign producer's ability to shift production include ***.

Imports from nonsubject sources

Nonsubject imports accounted for *** percent of total U.S. imports in 2021. The largest sources of nonsubject imports during 2019-21 was Mexico, which accounted for *** percent of total imports in 2021.

Supply constraints

One U.S. producer and two of six importers reported that they had experienced supply constraints since January 1, 2019. U.S. producer *** reported that it had temporary supply chain challenges due to the COVID-19 pandemic, some of which are still in place. Importer *** reported that its U.S. suppliers were unable to keep up with its demand due, in part, to issues with purchasing the raw materials or sourcing labor. Additionally, it had to pull inventory from its "3PLs and either dispose of or relabel due to mislabeling." Importer *** reported that it has experienced periods where inventory was out of stock during the ordinary course of business and/or as result of the COVID-19 pandemic.

U.S. demand

Based on available information, the overall demand for paper file folders is likely to experience moderately small changes in response to changes in price. The main contributing factor is limited substitute products, as paper file folders are an end-use consumer product.

Business cycles

One U.S. producer indicated that the market was subject to distinct conditions of competition while two importers reported that the market was subject to business cycles. Specifically, firms reported that demand will typically increase in the 4th quarter for tax season products to the end user as well as the typical cycle of setting up filing systems at the beginning

of each calendar year. Firms also reported an increase in demand in the 2nd quarter when its customers are stocking up in advance of the "back to school" rush by the end users.

Demand trends

Most firms reported a decrease in U.S. demand for paper file folders since January 1, 2019 (table II-4). Firms reported that demand declined in the 2nd and 3rd quarters of 2020 as office workers shifted to working at home due to the COVID-19 pandemic. Demand in 2021 and 2022 has increased since 2020, but still is down from 2019 because workers and in-office operations have not returned to pre-pandemic levels. Importer ***, which reported that demand fluctuated, reported that there has been an overall decrease in demand for office folders, but that trend began before January 1, 2019, as people decreased the amount printed year over year. It stated that for binders, demand was flat to 2019 with some fluctuations both directions since. Petitioner stated that the paper mills that they purchase from indicate that their grades of paper will decline year over year in the two to three percent range.⁷ Petitioner also stated that they look at general economic trends, white collar employment, and office occupancy rates as indicators of demand.⁸

Table II-4
Paper file folders: Count of firms' responses regarding overall domestic and foreign demand, by firm type

Market	Firm type	Increase	No change	Decrease	Fluctuate
Domestic demand	U.S. producers	0	0	2	0
Domestic demand	Importers	1	0	3	2
Foreign demand	U.S. producers	0	0	0	0
Foreign demand	Importers	0	0	0	1

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

Substitute products

Both U.S. producers and four importers reported that there are substitutes. Substitutes for paper file folders are filing products made with poly (plastic). All responding firms reported that the price of poly folders does not affect the price of paper file folders. U.S. producer *** stated that poly is a more expensive material than paper and is viewed as more durable. It also reported that poly is generally not perceived as a direct substitute to paper filing products, so the price sensitivity between paper filing products and poly is not as pronounced as it is between private brand and manufacturer-branded paper filing products. U.S. producer

⁷ Conference transcript, p. 84 (Avent).

⁸ Conference transcript, p. 86 (Roberts).

*** reported that poly file folders are significantly more expensive than paper file folders, and the two types of folders do not compete for the same business. Importer *** reported that poly folders are a much higher cost.

Substitutability issues

This section assesses the degree to which U.S.-produced paper file folders and imports of paper file folders from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of paper file folders from domestic and imported sources based on those factors. Based on available data, staff believes that there is a high degree of substitutability between domestically produced paper file folders and paper file folders imported from subject sources.⁹ Factors contributing to this level of substitutability include reported high interchangeability between domestic and subject sources, and limited significant factors other than price.¹⁰

Factors affecting purchasing decisions

Most important purchase factors

Purchasers responding to lost sales lost revenue allegations¹¹ were asked to identify the main purchasing factors their firm considered in their purchasing decisions for paper file folders. The major purchasing factors identified by both responding firms include quality and cost. One firm each reported Forest Stewardship Council certified (FSC) and sourced from vendors that have supply chain visibility, ability to delivery quantities needed in requested timeframes, and strategic partnership with vendors.

⁹ The degree of substitution between domestic and imported paper file folders depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced paper file folders to the paper file folders imported from subject countries (or vice versa) when prices change. The degree of substitution may include such factors as relative prices (discounts/rebates), quality differences (e.g., grade standards, defect rates, etc.), and differences in sales conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

¹⁰ Petitioner stated that “But essentially, the top of the box is the only thing that changes” and “you might go into an office store one day and buy their brand of file folders, that could be made by {the petitioner}. And then you could go in the next day and buy the exact, it looks like the same box, it’s the same number, it looks the same product, it goes into your filing system, and it’s made by the importers. That’s how close they are.” Conference transcript p. 87 (Taylor) and p. 88 (Vaughn).

¹¹ This information is compiled from responses by purchasers identified by Petitioner to the lost sales lost revenue allegations. See Part V for additional information.

Lead times

U.S. producers reported different practices with respect to whether they produce paper file folders to order or ship from inventory.¹² U.S. producer *** reported that *** percent of its commercial shipments were produced-to-order, with lead times of *** days, and the remaining *** percent of commercial shipments sold from inventory, with lead times averaging *** day. On the other hand, U.S. producer *** reported that *** percent of its commercial shipments were sold from inventory, with a lead time of *** days, and the remaining *** percent of commercial shipments were produced-to-order, with a lead time of *** days. Because importers are generally retailers and their shipments are reported as internal consumption, there is no data on lead times for commercial shipments.

Comparison of U.S.-produced and imported Paper file folders

In order to determine whether U.S.-produced paper file folders can generally be used in the same applications as imports from China, India, and Vietnam, U.S. producers and importers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables II-5 to II-6, both responding U.S. producers and all five responding importers reported that domestically produced paper file folders and paper file folders imported from subject countries are always interchangeable.

Table II-5
Paper file folders: Count of U.S. producers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. China	2	0	0	0
U.S. vs. India	2	0	0	0
U.S. vs. Vietnam	2	0	0	0
U.S. vs. other	2	0	0	0
China vs. India	2	0	0	0
China vs. Vietnam	2	0	0	0
India vs. Vietnam	2	0	0	0
China vs. Other	2	0	0	0
India vs. Other	2	0	0	0
Vietnam vs. Other	2	0	0	0

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

¹² By weighted average, *** percent of U.S. producers' commercial shipments were shipped from inventory with the remaining *** percent produced-to-order.

Table II-6

Paper file folders: Count of importers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. China	5	0	0	0
U.S. vs. India	5	0	0	0
U.S. vs. Vietnam	5	0	0	0
U.S. vs. other	3	1	0	0
China vs. India	4	1	0	0
China vs. Vietnam	3	1	0	0
India vs. Vietnam	4	0	0	0
China vs. Other	3	1	0	0
India vs. Other	3	1	0	0
Vietnam vs. Other	3	1	0	0

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

In addition, U.S. producers and importers were asked to assess how often differences other than price were significant in sales of paper file folders from the United States, subject, and nonsubject countries. As seen in tables II-7 to II-8, both U.S. producers and most responding importers reported that there are sometimes or never significant factors other than price. Importer *** reported that the risk is higher when importing from India because the quantities ordered are larger.

Table II-7

Paper file folders: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. China	0	0	0	2
U.S. vs. India	0	0	0	2
U.S. vs. Vietnam	0	0	0	2
U.S. vs. other	0	0	0	2
China vs. India	0	0	0	2
China vs. Vietnam	0	0	0	2
India vs. Vietnam	0	0	0	2
China vs. Other	0	0	0	2
India vs. Other	0	0	0	2
Vietnam vs. Other	0	0	0	2

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

Table II-8**Paper file folders: Count of importers reporting the significance of differences between product produced in the United States and in other countries, by country pair**

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. China	0	1	2	1
U.S. vs. India	1	0	2	1
U.S. vs. Vietnam	0	1	2	1
U.S. vs. other	0	0	2	1
China vs. India	0	0	2	2
China vs. Vietnam	0	0	2	1
India vs. Vietnam	0	0	2	1
China vs. Other	0	0	2	1
India vs. Other	0	0	2	1
Vietnam vs. Other	0	0	2	1

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

Part III: U.S. producers’ production, shipments, and employment

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the subsidies and dumping margins was presented in Part I of this report and information on the volume and pricing of imports of the subject merchandise is presented in Part IV and Part V. Information on the other factors specified is presented in this section and/or Part VI and (except as noted) is based on the questionnaire responses of two firms that accounted for *** percent of U.S. production of paper file folders during 2021.

U.S. producers

The Commission issued a U.S. producer questionnaire to six firms based on information contained in the petitions. Two firms provided usable data on their operations.¹ Staff believes that these responses represent the vast majority of U.S. production of paper file folders in 2021.²

Table III-1 lists U.S. producers of paper file folders, their production locations, positions on the petitions, and shares of total production.

Table III-1
Paper file folders: U.S. producers, their positions on the petitions, production locations, and shares of reported production, 2021

Firm	Position on petitions	Production location(s)	Share of production
Smead	Petitioner	Hastings, Minnesota Logan, Ohio Cedar City, Utah	***
TOPS	Petitioner	Union, Missouri	***
All firms	Petitioners	Various	100.0

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

¹ The Commission received a partially completed response to its questionnaire from ***. This firm produced *** folders in 2021 and *** the petitions.

² Smead and TOPS reported that they accounted for between *** percent of U.S. production in 2021. Petition, Volume I, p. 5.

As indicated in table III-2, *** is related to a U.S. importer of the subject merchandise. In addition, as discussed in greater detail later in the report, *** directly import the subject merchandise. No responding U.S. producer purchased the subject merchandise from U.S. importers.

Table III-2
Paper file folders: U.S. producers' ownership, related and/or affiliated firms

Reporting firm	Relationship type and related firm	Details of relationship
***	***	***
***	***	***

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

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of paper file folders since January 1, 2019. Two producers indicated in their questionnaires that they had experienced such changes. Additionally, a representative from Smead testified that the firm closed its facility in Reynosa, Mexico in 2020 and moved that business to its facilities in the United States.³ Table III-3 presents the changes identified by these producers.

Table III-3
Paper file folders: U.S. producers' reported changes in operations, since January 1, 2019

Item	Firm name and narrative response on changes in operations
Plant closings	***
Plant closings	***
Prolonged shutdowns or curtailments	***
Prolonged shutdowns or curtailments	***
Other	***

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

³ Conference transcript, p. 27 (Avent).

U.S. production, capacity, and capacity utilization

Table III-4 presents U.S. producers' installed capacity, practical capacity, and production on the same equipment. Production capacity is dedicated entirely to the production of paper file folders as neither responding U.S. producer reported production of other products on the same equipment used to produce paper file folders.⁴

Table III-4
Paper file folders: U.S. producers' overall capacity and production on the same equipment as subject production, by period

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical paper file folders	Capacity	***	***	***	***	***
Practical paper file folders	Production	***	***	***	***	***
Practical paper file folders	Utilization	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Note: Installed overall production capacity is the level of production that a firm's establishment(s) could have attained, assuming the firm's optimal product mix, and based solely on existing capital investments, i.e., machinery and equipment that is in place and ready to operate. This capacity measure does not account for other constraints to production such as existing workforce constraints, availability of raw materials, or downtime for maintenance, repair, and clean-up. This capacity measure is sometimes referred to as "nameplate" or "theoretical" capacity in some industries.

Note: Practical overall production capacity is the level of production that a firm's establishment(s) could reasonably have expected to attain, accounting for the firm's actual product mix over the period for which data were collected. This capacity measure is based on not only existing capital investments, i.e., machinery and equipment that is in place and ready to operate but also non-capital investment constraints, such as (1) normal operating conditions, including normal downtime for maintenance, repair, and cleanup; (2) the firm's existing in-place and readily available labor force; (3) availability of material inputs; and (4) any other constraints that may have limited the firm's ability to produce the reported products. Importantly, this capacity measure is the maximum "practical" production a firm could have achieved without hiring new personnel or expanding the number of shifts operated in the period.

⁴ U.S. producers' reported narratives regarding practical production constraints are presented in table III-6.

Table III-5 and figure III-1 present U.S. producers' production, practical production capacity, and capacity utilization. Responding U.S. producers' practical production capacity decreased in each year during 2019-21, ending *** percent lower in 2021 than in 2019. ***.⁵ Their practical capacity was *** percent lower in January-June ("interim") 2022 than in interim 2021. *** reported less practical production capacity in interim 2022 than in interim 2021, while *** reported *** practical production capacity in both interim periods. Responding U.S. producers' collective production fluctuated year to year, decreasing by *** percent from 2019 to 2020, then increasing by *** percent from 2020 to 2021, ending *** percent lower in 2021 than in 2019. ***.⁶ Their collective production was *** percent lower in interim 2022 than in interim 2021.⁷

⁵ ***. ***, October 31, 2022, p. 2 and ***, October 31, 2022, p. 2.

⁶ ***. ***, October 31, 2022, p. 2 and ***, October 31, 2022, p. 2.

⁷ ***. ***, October 31, 2022, p. 4 and ***, October 31, 2022, p. 3.

Responding U.S. producers' average practical capacity utilization increased from *** percent in 2019 to *** percent in 2021. The change in the average practical capacity utilization largely reflects *** operations as *** during 2019-21. The increase in *** practical capacity utilization from 2020 to 2021 reflects the increase in its production, despite reduced capacity. *** reported *** in interim 2022 than in interim 2021, while *** reported *** of practical capacity utilization in both interim periods.⁸

Table III-5
Paper file folders: Firm-by-firm capacity, by period

Capacity

Capacity in 1,000 folders

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-5 Continued
Paper file folders: Firm-by-firm production, by period

Production

Production in 1,000 folders

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-5 Continued
Paper file folders: Firm-by-firm capacity utilization, by period

Capacity utilization

Ratios in percent

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

⁸ ***. ***, October 31, 2022, p. 3.

Table III-5 Continued

Paper file folders: Firm-by-firm share of production, by period

Share of production

Share in percent

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0

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

Note: Capacity utilization ratio represents the ratio of the U.S. producer's production to its production capacity. Smead and TOPS reported their capacity based on operating ***.

Figure III-1

Paper file folders: U.S. producers' production, capacity, and capacity utilization, by period

* * * * *

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

Table III-6 presents U.S. producers' reported narratives regarding practical production constraints.

Table III-6
Paper file folders: U.S. producers' narrative responses regarding practical production constraints, since January 1, 2019

Item	Firm name and narrative response on production constraints
Production bottlenecks	***
Production bottlenecks	***
Existing labor force	***
Existing labor force	***
Supply of material inputs	***
Supply of material inputs	***
Fuel or energy	***
Logistics/transportation	***

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

Alternative products

Neither responding U.S. producer reported production of other products using the same equipment to produce paper file folders.

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

Table III-7 presents U.S. producers' U.S. shipments, export shipments, and total shipments. U.S. shipments accounted for *** percent of responding U.S. producers' total shipments in any year during 2019-21 and *** percent of total shipments in interim 2022.⁹ Responding U.S. producers' collective U.S. shipments fluctuated year to year, decreasing by *** percent from 2019 to 2020, then increasing by *** percent from 2020 to 2021, ending *** percent lower in 2021 than in 2019. The overall decrease reflects *** operations as *** U.S. shipments increased in each year during 2019-21.¹⁰ The responding U.S. producers' collective U.S. shipments were *** percent lower in interim 2022 than in interim 2021, with ***. The value of responding U.S. producers' collective U.S. shipments moved in a similar direction as the quantity, decreasing by *** percent from 2019 to 2020, and then increasing by *** percent from 2020 to 2021, ending *** percent lower in 2021 than in 2019. It was *** percent higher in interim 2022 than in interim 2021.

⁹ ***. Appendix D presents U.S. producers U.S. shipments by product type.

¹⁰ ***. ***, October 31, 2022, p. 2 and ***, October 31, 2022, p. 3.

The average unit value of responding U.S. producers' U.S. shipments increased from increased in each year during 2019-21, as the value decreased at a lower rate than quantity.¹¹ *** reported *** the unit value of its U.S. shipments in each year during 2019-21, while *** reported fluctuations in the unit value of its U.S. shipments.¹² The average unit value of responding U.S. producers' U.S. shipments was a period-high \$*** per 1,000 folders in interim 2022, compared with \$*** per 1,000 folders in interim 2021. *** unit value for their U.S. shipments in interim 2022 than in interim 2021.

Table III-7
Paper file folders: U.S. producers' total shipments, by destination and period

Quantity in 1,000 folders; value in 1,000 dollars; unit value in dollars per 1,000 folders; shares in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
U.S. shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
U.S. shipments	Share of quantity	***	***	***	***	***
Export shipments	Share of quantity	***	***	***	***	***
Total shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
U.S. shipments	Share of value	***	***	***	***	***
Export shipments	Share of value	***	***	***	***	***
Total shipments	Share of value	100.0	100.0	100.0	100.0	100.0

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

¹¹ The unit value of ***.

¹² ***. ***, October 31, 2022, p. 3.

By quantity, export shipments accounted for no more than *** percent of responding U.S. producers' total shipments throughout 2019-21 and in interim 2022.¹³ The quantity of responding U.S. producers' export shipments decreased by *** percent from 2019 to 2021, with *** of the decrease occurring from 2019 to 2020. It was *** percent lower in interim 2022 than in interim 2021. The value of responding U.S. producers' export shipments moved in the same direction as quantity during 2019-21, decreasing by *** percent, with most of the decrease occurring from 2019 to 2020. The value of responding U.S. producers' export shipments was the same in both interim periods. The unit value of responding U.S. producers' export shipments increased from \$*** per 1,000 folders in 2019 to \$*** per 1,000 folders in 2021 and was a period-high \$*** per 1,000 folders in interim 2022, compared with \$*** per 1,000 folders in interim 2021.

U.S. producers' inventories

Table III-8 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments. Responding U.S. producers' end-of-period inventories decreased in each year during 2019-21, ending *** percent lower in 2021 than in 2019.¹⁴ It was *** percent lower in interim 2022 than in interim 2021. The ratio of the responding U.S. producers end-of-period inventories to their production during 2019-21 ranged from *** percent to *** percent and was *** percent in interim 2022, compared with *** percent in interim 2021. The ratio of responding U.S. producers' end-of-period inventories to their U.S. shipments during 2019-21 ranged from *** percent to *** percent and was *** percent in interim 2022, compared with *** percent in interim 2021.

¹³ ***.

¹⁴ ***.

Table III-8
Paper file folders: U.S. producers' inventories and their ratio to select items, by period

Quantity in 1,000 folders; ratio in percent

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
End-of-period inventory quantity	***	***	***	***	***
Inventory ratio to U.S. production	***	***	***	***	***
Inventory ratio to U.S. shipments	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***

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

U.S. producers' imports from subject sources

Tables III-9 and III-10 present data on U.S. producers' imports of paper file folders, while table III-11 presents U.S. producers' reasons for importing. *** imported paper file folders from ***, while *** imported paper file folders from ***. The ratio of *** imports from *** to *** U.S. production in 2020 and 2021 was *** percent. It was *** percent in interim 2022, compared with *** percent in interim 2021. The ratio of *** imports from *** to *** U.S. production was *** percent throughout 2019-21 and was *** percent in interim 2022. The ratio of *** imports from China to its U.S. production did not exceed *** percent in any year during 2019-21 and was *** percent in interim 2022.

Table III-9**Paper file folders: *** U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity in 1,000 folders; ratio in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
U.S. production	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from subject sources	Quantity	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***
Imports from subject sources to U.S. production	Ratio	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table III-10**Paper file folders: *** U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity in 1,000 folders; ratio in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
U.S. production	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***

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

Table III-11**Paper file folders: U.S. producers' reasons for imports, by firm**

Item	Narrative response on reasons for importing
***'s reason for importing	***
***'s reason for importing	***

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

U.S. employment, wages, and productivity

Table III-12 presents U.S. producers' employment-related data. After decreasing by *** percent from 2019 to 2020, the number of production-related workers increased by *** percent from 2020 to 2021, returning to approximately the same level as 2019. Responding U.S. producers' number of PRWs was *** in both interim periods. Productivity decreased in each year during 2019-21, ending *** percent lower in 2021 than in 2019. It was *** percent lower in interim 2022 than in interim 2021. Unit labor costs, conversely, increased in each year during 2019-21, ending *** percent higher in 2021 than in 2019. It was *** percent higher in interim 2022 than in interim 2021. Total hours worked, hours worked per PRW, and wages paid were higher in 2021 than in 2019, while hourly wages were lower. Total hours worked and hours worked per PRW were lower in interim 2022 than in interim 2021, while wages paid and hourly wages were higher.

Table III-12

Paper file folders: U.S. producers' employment related information, by period

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Production and related workers (PRWs) (number)	***	***	***	***	***
Total hours worked (1,000 hours)	***	***	***	***	***
Hours worked per PRW (hours)	***	***	***	***	***
Wages paid (\$1,000)	***	***	***	***	***
Hourly wages (dollars per hour)	***	***	***	***	***
Productivity (folders per hour)	***	***	***	***	***
Unit labor costs (dollars per 1,000 folders)	***	***	***	***	***

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

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

U.S. importers

The Commission issued importer questionnaires to 20 firms believed to be importers of subject paper file folders, as well as to all U.S. producers of paper file folders.¹ Usable questionnaire responses were received from nine companies, representing the majority of subject imports and the vast majority of U.S. imports from nonsubject sources classified under HTS statistical reporting number 4820.30.0040, a “basket” category.² Table IV-1 lists all responding U.S. importers of paper file folders from China, India, Vietnam, and other sources, their locations, and their shares of U.S. imports, in 2021.

Table IV-1
Paper file folders: U.S. importers, their headquarters, and share of imports within each source, 2021

Share in percent

Firm	Headquarters	China	India	Vietnam	Subject sources
DolGen	Goodlettsville, TN	***	***	***	***
Dollar Tree	Chesapeake, VA	***	***	***	***
Franklin Creative Solutions	Huntsville, AL	***	***	***	***
Smead	Hastings, MN	***	***	***	***
Staples	Framingham, MA	***	***	***	***
Target	Minneapolis, MN	***	***	***	***
TOPS	Naperville, IL	***	***	***	***
U Brands	San Juan Capistrano, CA	***	***	***	***
Walmart	Bentonville, AR	***	***	***	***
All firms	Various	100.0	100.0	100.0	100.0

Table continued.

¹ The Commission issued questionnaires to those firms identified in the petitions, along with firms that, based on a review of data from third-party sources, may have accounted for more than one percent of total imports under HTS statistical reporting number 4820.30.0040 in 2021.

² The Commission received late and incomplete responses from ***.

Table IV-1 Continued
Paper file folders: U.S. importers, their headquarters, and share of imports within each source, 2021

Share in percent

Firm	Headquarters	Mexico	All other sources	Nonsubject sources	All import sources
DolGen	Goodlettsville, TN	***	***	***	***
Dollar Tree	Chesapeake, VA	***	***	***	***
Franklin Creative Solutions	Huntsville, AL	***	***	***	***
Smead	Hastings, MN	***	***	***	***
Staples	Framingham, MA	***	***	***	***
Target	Minneapolis, MN	***	***	***	***
TOPS	Naperville, IL	***	***	***	***
U Brands	San Juan Capistrano, CA	***	***	***	***
Walmart	Bentonville, AR	***	***	***	***
All firms	Various	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

U.S. imports

Table IV-2 and figure IV-1 present data for U.S. imports of paper file folders from China, India, Vietnam, and all other sources.³ Subject imports, by quantity, accounted for *** percent of total imports in each year during 2019-21. U.S. imports from India accounted for the largest share of total imports among subject sources in each calendar year during 2019-21. China accounted for the second largest share in each year, while Vietnam accounted for the smallest share. India was the only subject source whose share of total imports exceeded *** percent in any year during 2019-21. Subject imports accounted for a noticeably larger share of total imports in interim 2022 (*** percent) than in interim 2021 (*** percent), with U.S. imports from Vietnam accounting for *** percent of those imports. India accounted for the second largest share among subject sources in interim 2022, while China's share reached a period low (*** percent). U.S. imports from Mexico accounted for *** of total imports and *** nonsubject imports in each year during 2019-21. However, its share of total imports was noticeably smaller in interim 2022 (*** percent).

³ Appendix E presents data for U.S. imports of paper file folders from China, India, and Vietnam on a weight basis and official U.S. import statistics from the Department of Commerce Census Bureau using HTS statistical reporting number 4820.30.0040.

Table IV-2
Paper file folders: U.S. imports by source and period

Quantity in 1,000 folders; value in 1,000 dollars; unit value in dollars per 1,000 folders

Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
China	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Mexico	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
China	Value	***	***	***	***	***
India	Value	***	***	***	***	***
Vietnam	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Mexico	Value	***	***	***	***	***
All other sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
China	Unit value	***	***	***	***	***
India	Unit value	***	***	***	***	***
Vietnam	Unit value	***	***	***	***	***
Subject sources	Unit value	***	***	***	***	***
Mexico	Unit value	***	***	***	***	***
All other sources	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	***	***	***	***	***

Table continued.

Table IV-2 Continued
Paper file folders: Share of U.S. imports by source and period

Share and ratio in percent

Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
China	Share of quantity	***	***	***	***	***
India	Share of quantity	***	***	***	***	***
Vietnam	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	***	***	***	***	***
Mexico	Share of quantity	***	***	***	***	***
All other sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
China	Share of value	***	***	***	***	***
India	Share of value	***	***	***	***	***
Vietnam	Share of value	***	***	***	***	***
Subject sources	Share of value	***	***	***	***	***
Mexico	Share of value	***	***	***	***	***
All other sources	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
China	Ratio	***	***	***	***	***
India	Ratio	***	***	***	***	***
Vietnam	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Mexico	Ratio	***	***	***	***	***
All other sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

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

Note: Share of quantity is the share of U.S. imports by quantity; share of value is the share of U.S. imports by value; ratio are U.S. imports to production. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zero, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-1
Paper file folders: U.S. import quantities and average unit values, by source and period

* * * * *

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

U.S. imports from China, by quantity, decreased in each year, ending *** percent lower in 2021 than in 2019.⁴ ⁵ Among the six firms that reported imports from China in every year during 2019-21, three reported fewer imports in 2021 than in 2019. The decrease in *** imports from China more than offset the increase in *** imports from China.⁶ U.S. imports from China were

⁴ ***.

⁵ Overall, out-of-scope merchandise accounted for between *** and *** percent of responding U.S. importers' reported imports from China classified under HTS statistical reporting number 4820.30.0040 during 2019-21 and *** percent in interim 2022. The decrease in imports from China largely coincides with the imposition of the section 301 tariffs in 2019.

⁶ ***. Email from ***, October 25, 2022 and email from ***, October 31, 2022.

*** percent higher in interim 2022 than in interim 2021, with seven of eight firms reporting more imports in interim 2022.

U.S. imports from India fluctuated year to year, decreasing by *** percent from 2019 to 2020, then increasing by *** percent from 2020 to 2021, ending *** percent higher in 2021 than in 2019. Among the three firms that reported imports from India in each year during 2019-21, two reported more imports in 2021 than in 2019, with *** accounting for the majority of the increase and offsetting the decrease reported by ***.⁷ U.S. imports from India were *** percent higher in interim 2022 than in interim 2021.⁸

U.S. imports from Vietnam increased in each year during 2019-21, ending *** higher in 2021 than in 2019. This increase largely coincides with the decrease in imports from China. The majority of the increase was driven by ***, which ***.⁹ U.S. imports from Vietnam were *** higher in interim 2022 than in interim 2021. The difference in the quantity of imports from Vietnam between the interim periods is largely attributable to ***.¹⁰

⁷ ***. Email from ***, November 3, 2022.

⁸ The difference in the quantity of imports from India between the two interim periods is mostly attributable to ***, whose imports were *** higher in interim 2022 than in interim 2021. ***. Respondents Staples, Navneet, Three-Color Stone, and Thrasio's postconference brief, exh. 2.

⁹ ***. Email from ***, October 31, 2022.

¹⁰ ***

Overall, the quantity of subject imports fluctuated year to year decreasing by *** percent from 2019 to 2020, then increasing by *** percent from 2020 to 2021, ending *** percent higher in 2021 than in 2019. The decrease in U.S. imports from China were offset by the coinciding increases in U.S. imports from India and Vietnam. The quantity of subject imports was *** higher in interim 2022 than in interim 2021 as imports from each subject source, particularly Vietnam, were higher.

The quantity of U.S. imports from Mexico, the largest nonsubject source, fluctuated year to year during 2019-21, decreasing by *** percent from 2019 to 2020, then increasing by *** percent from 2020 to 2021, ending *** percent lower in 2021 than in 2019. Among the three firms that reported imports from Mexico, two reported less imports in 2021 than in 2019.¹¹ They were *** percent higher in interim 2022 than in interim 2021, reflecting the difference in *** imports between those periods.

By value, U.S. imports from China decreased irregularly by *** percent during 2019-21 and was *** percent higher in interim 2022 than in interim 2021. The value of U.S. imports from India increased irregularly by *** percent during 2019-21 and was *** percent higher in interim 2022 than in interim 2021. The value of U.S. imports from Vietnam increased in each year during 2019-21, ending *** higher in 2021 than in 2019. It was *** higher in interim 2022 than in interim 2021, reflecting the increase in the quantity of imports. Overall, the value of subject imports increased in each year during 2019-21, ending *** percent higher in 2021 than in 2019. It was *** percent higher in interim 2022 than in interim 2021. The value of U.S. imports from Mexico fluctuated year to year during 2019-21,

***. Respondents Staples, Navneet, Three-Color Stone, and Thrasio's postconference brief, exh. 2.

¹¹ ***. Smead closed its facility in Reynosa, Mexico in 2020 and moved that business to its facilities in the United States. Conference transcript, p. 27 (Avent). ***. Email from ***, November 3, 2022 and ***, October 31, 2022, p. 5.

ending *** percent lower in 2021 than in 2019. It was *** percent higher in interim 2022 than in interim 2021.

The unit value of imports from China fluctuated year to year during 2019-21, ending higher in 2021 than in 2019. It was higher in interim 2022 than in interim 2021. The unit value of imports from India increased in each year during 2019-21 but was still the lowest among all individual sources in each year of that period. The unit value of imports from India was lower in interim 2022 than in interim 2021. The unit value of imports from Vietnam decreased in each year during 2019-21 but was still the highest among all individual sources in each year of that period. However, it was the lowest among all individual sources in interim 2022 after reaching a period low. Overall, the unit value of subject imports fluctuated year to year from 2019 to 2021, ending higher in 2021 than in 2019. It was lower in interim 2022 than in interim 2021.¹²

The unit value of U.S. imports from Mexico fluctuated year to year, ending lower in 2021 than in 2019. However, it was higher in interim 2022 than in interim 2021. The unit value of U.S. imports from Mexico was lower than the unit value of imports from China in each year during 2019-21 and in interim 2022, but higher than the unit value of imports from India. It was lower than the unit value of imports from Vietnam in each year during 2019-21 but was higher in interim 2022. Overall, the unit value of imports from Mexico was higher than the unit value of subject imports in 2019 and interim 2022, but lower in 2020, 2021, and interim 2021.

Table IV-3 presents data on the changes in import quantity, value, and unit value between the comparison periods.

¹² The variance in the unit values across the different years and subject sources is largely explained by differences in changes to a very wide product mix. The majority of U.S. shipments of imports from China throughout 2019-21 and interim 2022 were manila folders, which is the lowest value product on a per unit basis. Manila folders represented the vast majority of U.S. shipments of imports from India during 2019-21 and interim 2022, which largely explains the relatively lower unit values and more stable rate of change in unit value, compared with imports from China and Vietnam. The majority of U.S. shipments of imports from Vietnam during 2019-21, were non-manila folders, primarily hanging and fastener folders, while in interim 2022 the vast majority of those shipments were manila folders, which explains, in part, the noticeable difference in unit value between interim 2022 and the rest of the period for which data were collected. Appendix D presents data on U.S. producers' and U.S. importers' U.S. shipments of paper file folders by product type during 2019-21 and interim 2022.

Table IV-3
Paper file folders: Changes in import quantity, values, and unit values between comparison periods

Change in percent

Source	Measure	2019-21	2019-20	2020-21	Jan-Jun 2021-22
China	%Δ Quantity	▼***	▼***	▼***	▲***
India	%Δ Quantity	▲***	▼***	▲***	▲***
Vietnam	%Δ Quantity	▲***	▲***	▲***	▲***
Subject sources	%Δ Quantity	▲***	▼***	▲***	▲***
Mexico	%Δ Quantity	▼***	▼***	▲***	▲***
All other sources	%Δ Quantity	***	***	▲***	▲***
Nonsubject sources	%Δ Quantity	▼***	▼***	▲***	▲***
All import sources	%Δ Quantity	▼***	▼***	▲***	▲***
China	%Δ Value	▼***	▲***	▼***	▲***
India	%Δ Value	▲***	▼***	▲***	▲***
Vietnam	%Δ Value	▲***	▲***	▲***	▲***
Subject sources	%Δ Value	▲***	▲***	▲***	▲***
Mexico	%Δ Value	▼***	▼***	▲***	▲***
All other sources	%Δ Value	***	***	▲***	▲***
Nonsubject sources	%Δ Value	▼***	▼***	▲***	▲***
All import sources	%Δ Value	▼***	▼***	▲***	▲***
China	%Δ Unit value	▲***	▲***	▼***	▲***
India	%Δ Unit value	▲***	▲***	▲***	▼***
Vietnam	%Δ Unit value	▼***	▼***	▼***	▼***
Subject sources	%Δ Unit value	▲***	▲***	▼***	▼***
Mexico	%Δ Unit value	▼***	▲***	▼***	▲***
All other sources	%Δ Unit value	***	***	▲***	▼***
Nonsubject sources	%Δ Unit value	▼***	▲***	▼***	▲***
All import sources	%Δ Unit value	▼***	▲***	▼***	▼***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

Table IV-4 presents data on U.S. imports by U.S. producers or firms related to U.S. producers. Such imports accounted for between *** and *** percent of subject-source imports during 2019-21. They accounted for *** percent of subject-source imports in interim 2022, compared with *** percent in interim 2021. U.S. imports by U.S. producers or firms related to U.S. producers accounted for between *** percent and *** percent of nonsubject-source imports during 2019-21. They accounted for *** percent of nonsubject-source imports in interim 2022, compared with *** percent in interim 2021. Overall, these imports accounted for between *** percent and *** percent of all U.S. imports during 2019-21 and *** percent in interim 2022, compared with *** percent in interim 2021.

Table IV-4
Paper file folders: U.S. imports by U.S. producers or firms related to U.S. producers, by source and period

Quantity in 1,000 folders; ratio by source in percent

Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
China	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Mexico	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
China	Ratio	***	***	***	***	***
India	Ratio	***	***	***	***	***
Vietnam	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Mexico	Ratio	***	***	***	***	***
All other sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

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

Note: U.S. imports by U.S. producers or firms related to U.S. producers are based on data compiled in responses to the Commission's questionnaire by U.S. producers and their related importers. The share by source is the ratio of these imports to overall imports as presented in table IV-2. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.¹³ 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

¹³ 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)).

imports from such countries are deemed not to be negligible.¹⁴ In the case of countervailing duty investigations involving developing countries (as designated by the United States Trade Representative), the statute indicates that the negligibility limits are 4 percent and 9 percent, rather than 3 percent and 7 percent.¹⁵ By quantity, imports from China, India, and Vietnam accounted for *** percent, *** percent, and *** percent of total imports of paper file folders, respectively, during the most recent 12-month period preceding the filing of the petitions (October 2021-September 2022).¹⁶ Table IV-5 presents the share of total U.S. imports, by quantity, attributable to China, India, Vietnam, and nonsubject sources during the most recent twelve-month period preceding the filing of the petitions.

Table IV-5
Paper file folders: U.S. imports in the twelve-month period preceding the filing of the petitions, October 2021 through September 2022

Quantity in 1,000 folders; share in percent

Source of imports	Quantity	Share of quantity
China	***	***
India	***	***
Vietnam	***	***
Mexico	***	***
All other sources	***	***
All import sources	***	100.0

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

Cumulation considerations

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

¹⁴ Section 771 (24) of the Act (19 U.S.C § 1677(24)).

¹⁵ Section 771 (24)(B) of the Act (19 U.S.C § 1677(24)(B)).

¹⁶ According to adjusted official U.S. import statistics from the Department of Commerce Census Bureau using statistical reporting number 4820.30.0040, imports from China, Vietnam, and India accounted for *** percent, *** percent, and *** percent of total imports, respectively, during the most recent 12-month period preceding the filing of the petitions. These data were adjusted by removing out-of-scope merchandise classified under HTS statistical reporting number 4820.30.0040 and including in-scope merchandise classified under other HTS statistical reporting numbers as reported by U.S. importers in their responses to the Commission’s questionnaire.

concerning fungibility, geographical markets, and simultaneous presence in the market is presented below.

Fungibility

Table IV-6 and figure IV-2 present data on U.S. producers' and U.S. importers' U.S. shipments of paper file folders by product type in 2021. Manila folders accounted for the vast majority of U.S. producers' U.S. shipments and U.S. shipments of imports from China and Vietnam. Manila folders also accounted for all U.S. shipments of imports from India. Hanging folders accounted for the second largest share of U.S. producers' U.S. shipments and U.S. shipments of imports from China and Vietnam, while expanding folders accounted for the smallest share. U.S. producers accounted for the majority of U.S. shipments of manila, hanging, and fastener folders and the largest share of U.S. shipments of other folders. U.S. imports from Mexico accounted for the vast majority of U.S. shipments of expanding folders and the second largest share of U.S. shipments of each of the other types of paper file folders.

Table IV-6
Paper file folders: U.S. producers' and U.S. importers' U.S. shipments, by source and product type, 2021

Quantity in 1,000 folders

Source	Manila	Hanging	Fastener	Expanding	Other	All product types
U.S. producers	***	***	***	***	***	***
China	***	***	***	***	***	***
India	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Mexico	***	***	***	***	***	***
All other sources	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All import sources	***	***	***	***	***	***
All sources	***	***	***	***	***	***

Table continued.

Table IV-6 Continued
Paper file folders: U.S. producers' and U.S. importers' U.S. shipments, by source and product type, 2021

Share across in percent

Source	Manila	Hanging	Fastener	Expanding	Other	All product types
U.S. producers	***	***	***	***	***	100.0
China	***	***	***	***	***	100.0
India	***	***	***	***	***	100.0
Vietnam	***	***	***	***	***	100.0
Subject sources	***	***	***	***	***	100.0
Mexico	***	***	***	***	***	100.0
All other sources	***	***	***	***	***	100.0
Nonsubject sources	***	***	***	***	***	100.0
All import sources	***	***	***	***	***	100.0
All sources	***	***	***	***	***	100.0

Table continued.

Table IV-6 Continued
Paper file folders: U.S. producers' and U.S. importers' U.S. shipments, by source and product type, 2021

Share down in percent

Source	Manila	Hanging	Fastener	Expanding	Other	All product types
U.S. producers	***	***	***	***	***	***
China	***	***	***	***	***	***
India	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Mexico	***	***	***	***	***	***
All other sources	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All import sources	***	***	***	***	***	***
All sources	100.0	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--".

Figure IV-2
Paper file folders: U.S. producers' and U.S. importers' U.S. shipments, by source and product type, 2021

* * * * *

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

Geographical markets

Table IV-7 presents data on U.S. imports of paper file folders by border of entry in 2021. According to official import statistics, imports from each subject source entered the United States through ports in every region. Most imports from China entered the United States in 2021 through ports located in either the East, South, or West. The majority of imports from India entered the United States through ports located in the East, while the majority of imports from Vietnam entered the United States through ports located in the West. Overall, the largest share of subject imports entered the United States through ports located in the West, followed by ports in the East.

Table IV-7
Paper file folders: U.S. imports by source and border of entry, 2021

Quantity in 1,000 pounds

Source	East	North	South	West	All borders
China	3,059	1,473	2,471	3,950	10,952
India	3,552	681	1,967	759	6,959
Vietnam	2,222	1,344	2,309	8,095	13,970
Subject sources	8,833	3,497	6,747	12,804	31,882
Mexico	---	---	32,316	9	32,325
All other sources	693	757	69	121	1,639
Nonsubject sources	693	757	32,385	130	33,964
All import sources	9,526	4,254	39,132	12,935	65,846

Table continued.

Table IV-7 Continued
Paper file folders: U.S. imports by source and border of entry, 2021

Share across in percent

Source	East	North	South	West	All borders
China	27.9	13.5	22.6	36.1	100.0
India	51.0	9.8	28.3	10.9	100.0
Vietnam	15.9	9.6	16.5	57.9	100.0
Subject sources	27.7	11.0	21.2	40.2	100.0
Mexico	---	---	100.0	0.0	100.0
All other sources	42.3	46.2	4.2	7.4	100.0
Nonsubject sources	2.0	2.2	95.3	0.4	100.0
All import sources	14.5	6.5	59.4	19.6	100.0

Table continued.

Table IV-7 Continued
Paper file folders: U.S. imports by source and border of entry, 2021

Share down in percent

Source	East	North	South	West	All borders
China	32.1	34.6	6.3	30.5	16.6
India	37.3	16.0	5.0	5.9	10.6
Vietnam	23.3	31.6	5.9	62.6	21.2
Subject sources	92.7	82.2	17.2	99.0	48.4
Mexico	---	---	82.6	0.1	49.1
All other sources	7.3	17.8	0.2	0.9	2.5
Nonsubject sources	7.3	17.8	82.8	1.0	51.6
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 4820.30.0040, accessed October 21, 2022. Imports are based on the imports for consumption data series.

Presence in the market

U.S. imports of paper file folders from each subject source were present in every month during January 2019-June 2022. Imports from each subject source would typically peak during May-July of each calendar year. Table IV-8 and figures IV-3 and IV-4 present monthly data for subject and nonsubject imports of paper file folders during January 2019-June 2022.

Table IV-8
Paper file folders: Quantity of U.S. imports, by month and source

Quantity in 1,000 pounds

Year	Month	China	India	Vietnam	Subject sources
2019	January	2,263	531	23	2,816
2019	February	2,160	383	107	2,650
2019	March	1,535	463	83	2,081
2019	April	1,895	436	243	2,574
2019	May	5,277	554	595	6,425
2019	June	6,542	610	230	7,382
2019	July	3,270	632	185	4,087
2019	August	2,035	305	70	2,410
2019	September	1,416	249	123	1,788
2019	October	1,326	52	9	1,387
2019	November	1,416	429	80	1,925
2019	December	1,847	640	63	2,550
2020	January	1,961	364	43	2,368
2020	February	2,080	439	125	2,644
2020	March	644	436	322	1,403
2020	April	2,029	339	771	3,139
2020	May	2,748	116	2,048	4,912
2020	June	3,823	143	2,263	6,228
2020	July	1,687	252	878	2,817
2020	August	525	706	793	2,025
2020	September	748	511	460	1,719
2020	October	675	158	384	1,218
2020	November	842	379	342	1,563
2020	December	771	764	744	2,280

Table continued.

Table IV-8 Continued
Paper file folders: Quantity of U.S. imports, by month and source

Quantity in 1,000 pounds

Year	Month	China	India	Vietnam	Subject sources
2021	January	369	488	551	1,407
2021	February	812	621	534	1,967
2021	March	719	443	910	2,072
2021	April	539	440	627	1,606
2021	May	1,665	928	1,786	4,380
2021	June	2,377	765	2,318	5,460
2021	July	981	489	1,377	2,846
2021	August	738	301	1,715	2,754
2021	September	971	358	1,277	2,606
2021	October	688	648	979	2,314
2021	November	580	882	739	2,201
2021	December	513	597	1,159	2,270
2022	January	736	537	960	2,233
2022	February	1,089	475	1,248	2,812
2022	March	1,153	424	900	2,477
2022	April	1,565	694	2,083	4,342
2022	May	1,656	1,559	4,454	7,669
2022	June	2,667	1,057	7,852	11,576
2022	July	1,802	1,384	3,899	7,085
2022	August	876	1,041	4,573	6,490
2022	September	927	999	2,037	3,963

Table continued.

Table IV-8 Continued
Paper file folders: Quantity of U.S. imports, by month and source

Quantity in 1,000 pounds

Year	Month	Mexico	All other sources	Nonsubject sources	All import sources
2019	January	4,217	270	4,487	7,304
2019	February	3,575	99	3,673	6,324
2019	March	4,161	135	4,296	6,377
2019	April	3,794	209	4,002	6,576
2019	May	3,580	407	3,987	10,412
2019	June	3,346	187	3,533	10,916
2019	July	3,732	286	4,018	8,105
2019	August	3,854	145	3,999	6,408
2019	September	2,837	259	3,096	4,884
2019	October	4,880	259	5,140	6,527
2019	November	4,346	127	4,473	6,398
2019	December	3,167	501	3,668	6,218
2020	January	3,483	170	3,653	6,021
2020	February	3,337	147	3,484	6,128
2020	March	3,634	109	3,743	5,146
2020	April	890	114	1,004	4,142
2020	May	591	61	653	5,565
2020	June	2,488	196	2,684	8,912
2020	July	2,491	118	2,609	5,426
2020	August	2,576	99	2,676	4,701
2020	September	2,378	101	2,479	4,198
2020	October	2,881	233	3,113	4,331
2020	November	2,871	167	3,038	4,600
2020	December	2,275	277	2,552	4,832

Table continued.

Table IV-8 Continued
Paper file folders: Quantity of U.S. imports, by month and source

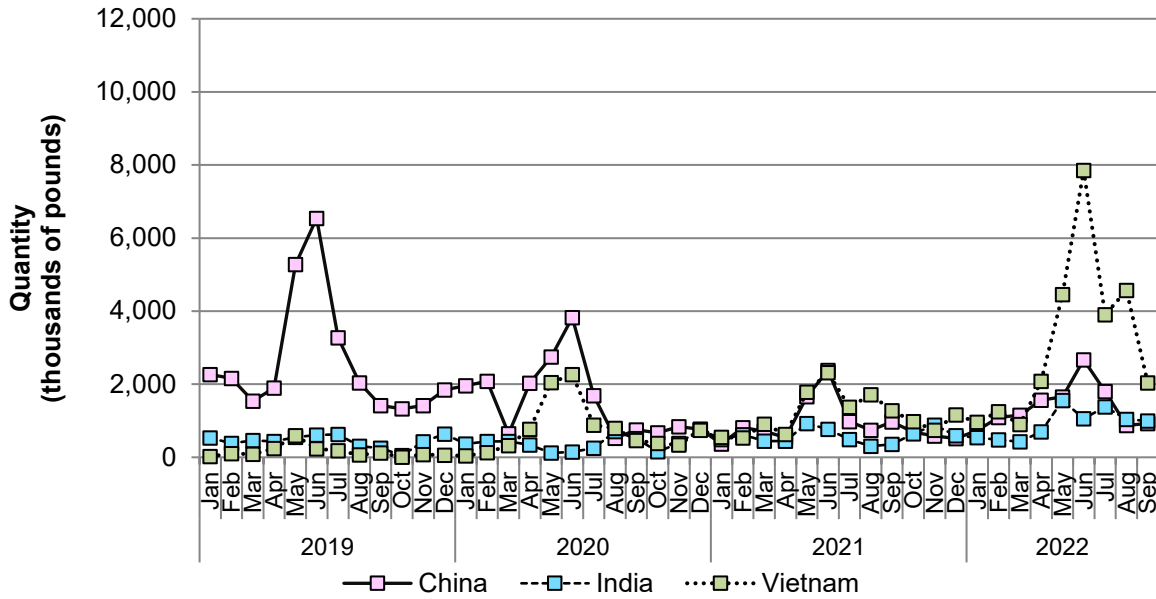
Quantity in 1,000 pounds

Year	Month	Mexico	All other sources	Nonsubject sources	All import sources
2021	January	1,779	75	1,854	3,261
2021	February	1,721	100	1,821	3,787
2021	March	2,166	98	2,263	4,335
2021	April	2,047	185	2,232	3,838
2021	May	2,707	175	2,883	7,262
2021	June	3,166	145	3,311	8,771
2021	July	3,446	115	3,561	6,407
2021	August	3,208	97	3,305	6,059
2021	September	3,276	178	3,454	6,059
2021	October	2,486	145	2,631	4,945
2021	November	3,194	145	3,339	5,540
2021	December	3,128	181	3,310	5,579
2022	January	2,673	163	2,836	5,069
2022	February	2,493	124	2,618	5,429
2022	March	3,077	283	3,360	5,837
2022	April	2,146	131	2,277	6,620
2022	May	2,554	162	2,716	10,386
2022	June	2,618	313	2,930	14,507
2022	July	2,271	374	2,645	9,730
2022	August	2,470	468	2,937	9,428
2022	September	2,668	428	3,097	7,059

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 4820.30.0040, accessed November 7, 2022. Imports are based on the imports for consumption data series.

Figure IV-3
Paper file folders: U.S. imports from individual subject sources, by source and month

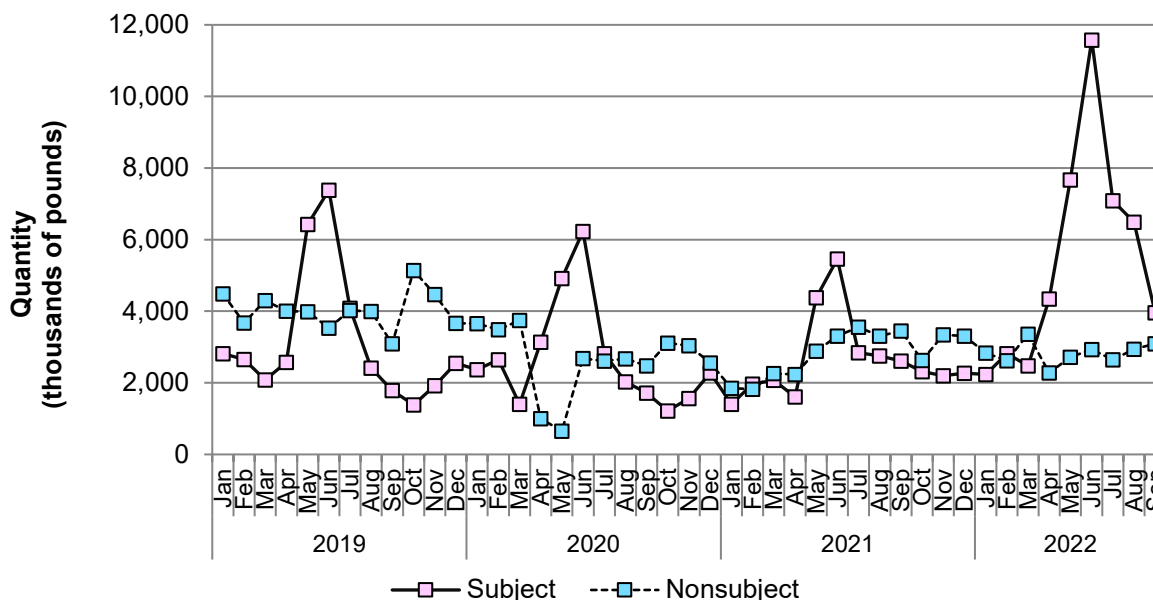
Quantity in 1,000 pounds



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 4820.30.0040, accessed November 7, 2022. Imports are based on the imports for consumption data series.

Figure IV-4
Paper file folders: U.S. imports from aggregated subject and nonsubject sources, by month

Quantity in 1,000 pounds



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 4820.30.0040, accessed November 7, 2022. Imports are based on the imports for consumption data series.

Apparent U.S. consumption and market shares

Quantity

Table IV-9 and figure IV-5 present data on apparent U.S. consumption and U.S. market shares by quantity for paper file folders.¹⁷ Apparent U.S. consumption, by number of folders, fluctuated year to year, decreasing by *** percent from 2019 to 2020, then increasing by *** percent from 2020 to 2021, ending *** percent lower in 2021 than in 2019. It was *** percent higher in interim 2022 than in interim 2021. The decrease in apparent U.S. consumption from 2019 to 2020 generally reflects the decrease in U.S. producers’ U.S. shipments and U.S. importers’ U.S. shipments from every source, except Vietnam, largely coinciding with the COVID-19 pandemic.¹⁸ The increase in apparent U.S. consumption from 2020 to 2021 generally reflects the increase in U.S. producers’ U.S shipments and U.S. importers’ U.S. shipments of imports from India and Vietnam. The difference in apparent U.S.

¹⁷ Appendix E presents data on apparent U.S. consumption on a weight basis.

¹⁸ For further discussion on the trends in U.S. producers’ U.S. shipments, see Part III and for further discussion on trends in subject and nonsubject imports see the section entitled “U.S. imports”.

consumption between the interim periods mostly reflects the difference in U.S. shipments of imports from Vietnam, which was *** higher in interim 2022 than in interim 2021. Conversely, U.S. producers' U.S. shipments were *** percent lower in interim 2022 than in interim 2021.

Table IV-9
Paper file folders: Apparent U.S. consumption and market shares based on quantity, by source and period

Quantity in 1,000 folders; shares in percent

Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Mexico	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Mexico	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

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

Figure IV-5

Paper file folders: Apparent U.S. consumption based on quantity, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires

U.S. producers' market share, by quantity, increased from *** percent in 2019 to *** percent in 2021. It was a period-low *** percent in interim 2022, compared with a period-high *** percent in interim 2021. The market shares of U.S. shipments of imports from each of the subject sources did not exceed *** percent throughout 2019-21, with India the only subject source whose market share exceeded *** percent in any year during 2019-21. Overall, the market share of U.S. shipments of subject imports increased during 2019-21, but more modestly than U.S. producers' market share. It did not exceed *** percent during the period.

The market shares of U.S. shipments of imports from India and Vietnam, by quantity, were a period-high *** percent and *** percent, respectively, in interim 2022, compared with *** percent and *** percent, respectively, in interim 2021. Conversely, the market share of U.S. shipments of imports from China was a period-low *** percent in both interim periods. Overall, the market share of U.S. shipments of subject imports reached a period-high *** percent in interim 2022, compared with *** percent in interim 2021.

U.S. shipments of imports from Mexico held the largest market share among the individual import sources throughout 2019-21. It decreased from *** percent in 2019 to *** percent in 2021 and was a period-low *** percent in interim 2022, compared with *** percent in interim 2021. Despite the change between the interim periods, U.S. shipments of imports from Mexico continued to hold the largest market share among the individual import sources. The market share of imports from all other sources was *** percent throughout 2019-21 and was *** percent in interim 2022.

Value

Table IV-10 and figure IV-6 present data on apparent U.S. consumption and U.S. market shares by value for paper file folders. The value of apparent U.S. consumption moved in the same direction as quantity, decreasing by *** percent from 2019 to 2020, then increasing by *** percent from 2020 to 2021, ending *** percent lower in 2021 than in 2019. It was *** percent higher in interim 2022 than in interim 2021. The decrease in apparent U.S. consumption from 2019 to 2020 largely reflects the decreases in the value of U.S. producers' U.S. shipments and U.S. shipments of imports from Mexico. The increase in apparent U.S. consumption from 2020 to 2021 largely reflects the increase in the values of U.S. producers' U.S. shipments and U.S. shipments of imports from Vietnam. The difference in the value of apparent U.S. consumption between the interim periods largely reflects the difference in the value of U.S. shipments

U.S. producers' market share increased from *** percent in 2019 to *** percent in 2021 and was *** percent in interim 2022, compared with *** percent in interim 2021. The market share of U.S. shipments of imports from each subject source did not exceed *** percent throughout 2019-21. Overall, the market share of U.S. shipments of subject sources increased during 2019-21, but more modestly than U.S. producers' market share. It did not exceed *** percent during the period.

The market share of U.S. shipments of imports from Vietnam was a period-high of *** percent in interim 2022, compared with *** percent in interim 2021. The market shares of U.S. shipments of imports from China and India were *** percent and *** percent, respectively, in interim 2022, compared with *** percent and *** percent, respectively, in interim 2021. Overall, the market share of U.S. shipments of subject imports reached a period-high *** percent in interim 2022, compared with *** percent in interim 2021.

U.S. shipments of imports from Mexico held the largest share, by value, among all import sources throughout 2019-21. It decreased from *** percent in 2019 to *** percent in 2021 and reached a period-low *** percent in interim 2022, compared with *** percent in interim 2021. Despite the change between the interim periods, U.S. shipments from Mexico continued to hold the largest market share, by value, among all import sources. The market share of all other sources, by value, increased from *** percent in 2020 to *** percent in 2021 and was a period-high *** percent in interim 2022, compared with *** percent in interim 2021.

Table IV-10

Paper file folders: Apparent U.S. consumption and market shares based on value, by source and period

Value in 1,000 dollars; shares in percent

Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
U.S. producers	Value	***	***	***	***	***
China	Value	***	***	***	***	***
India	Value	***	***	***	***	***
Vietnam	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Mexico	Value	***	***	***	***	***
All other sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Mexico	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

Figure IV-6
Paper file folders: Apparent U.S. consumption based on value, by source and period

* * * * *

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

Part V: Pricing data

Factors affecting prices

Raw material costs

Paper file folders are made from large rolls of uncoated free sheet paper from paper mills. Other components include metal fasteners, steel rods, glue, Tyvek, and boxes for packaging.¹ Raw materials as a share of cost of goods sold (COGS) *** from *** percent in 2019 to *** percent in 2021.² However, the unit value of raw materials *** during 2019-21. Overall, the prices for 20-lb uncoated free sheet copy paper and 50-lb offset rolls *** from January 2019 to October 2022.³

Both U.S. producers and five of six responding importers reported that raw material costs had increased since January 1, 2019. Both U.S. producers reported that they increased their prices due to raw material cost increases but have had difficulties doing so. Importer *** reported that it had ***. Importer *** reported that unit prices have increased approximately 20 percent in part due to the increase in raw material costs.

Transportation costs to the U.S. market

Transportation costs for paper file folders shipped from subject countries to the United States averaged 12.2 percent for China, 10.7 percent for India, and 11.7 percent for Vietnam during 2021. These estimates were derived from official import data and represent the transportation and other charges on imports.⁴

¹ Conference transcript, pp. 89-90 (Roberts, Beckman).

² Raw materials as a share of COGS were *** in January-June 2022 compared to January-June 2021.

³ Derived from Petitioners' postconference brief, Attachment to Exhibit 23, presenting proprietary price data for uncoated paper inputs from ***.

⁴ The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2021 and then dividing by the customs value based on the HTS statistical reporting number 4820.30.0040.

U.S. inland transportation costs

*** responding U.S. producers and five of six responding importers reported that they typically arrange transportation to their customers. U.S. producer *** reported that its U.S. inland transportation costs were *** percent while importers reported costs of 3.0 to 35.0 percent.

Pricing practices

Pricing methods, sales terms, and discounts

*** U.S. producers reported setting prices using ***. One importer (***) reported using contracts and a set price list. U.S. producers and importers reported selling the vast majority of their paper file folders under annual contracts (table V-1). *** U.S. producers and importer *** reported that their annual contracts include price renegotiation and do not index prices to raw materials. U.S. producer *** reported that its annual contracts fix prices. U.S. producers typically quote prices on a delivered basis and do not offer discounts.⁵

Table V-1

Paper file folders: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2021

Share in percent

Type of sale	U.S. producers	Subject importers
Long-term contracts	***	***
Annual contracts	***	***
Short-term contracts	***	***
Spot sales	***	***
Total	100.0	100.0

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

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

Price and purchase cost data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following paper file folder products shipped to unrelated U.S. customers during January 2019-June 2022. Firms that imported these products

⁵ Because importers are primarily retailers, responses to this question were in reference to retail sales. Staff has excluded these responses.

from China, India, and/or Vietnam for their own use, repackaging, and/or retail sale were requested to provide import purchase cost data.

Product 1.-- Box of 100 file folders, each folder made from a single piece of paperboard folded along a primary score line that creates a front flap and a back flap. The paperboard is made from uncoated freesheet paper, manila in color, with a thickness of 11 points, a 105 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 0 to 10 percent recycled post-consumer waste. Each file folder is letter size and will have an extended paper tab on the back flap visible above the height of the front flap for labeling. Each file folder will have one 1/3 cut size tab in one of three positions (left, center, right).

Product 2.--Box of 25 hanging file folders, each folder made from a single piece of paperboard folded along a primary score line that creates a front flap and a back flap. The paperboard is made from uncoated freesheet paper, standard green in color, with a thickness of 11 points and a 126 to 144 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis). Each hanging file folder is letter size and will have a metal rod with small indentations or hooks on the end, and the ends of the rods will be coated. The box will contain 25 plastic tabs, each of which is 1/5 cut size, along with 25 white paper inserts.

Product 3.--Box of 50 fastener folders, each folder made from a single piece of paperboard folded along a primary score line that creates a front flap and a back flap. The paperboard is made from uncoated freesheet paper, manila in color, with a thickness of 11 points, a 124 pound basis weight (using a 24 inch x 36 inch, 3,000 square foot basis), and 10 percent recycled post-consumer waste. Each fastener folder will be letter size and will come with two embedded 2 inch fasteners stamped into the material. Each fastener folder will have an extended reinforced paper tab on the back flap visible above the height of the front flap for labeling. Each fastener folder will have one 1/3 reinforced tab in one of three positions (left, center, right).

Two U.S. producers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.⁶ Pricing data reported by these firms accounted for approximately *** percent of the value of U.S. producers' shipments of paper file folders during 2019-21.

⁶ Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates.

Two importers (***) provided usable purchase cost data.^{7 8} Purchase cost data reported by these firms accounted for *** percent of the value of imports from China,⁹ and *** percent of the value of imports from Vietnam during 2019-21.¹⁰ Landed duty-paid (LDP) purchase cost data for imports from China, India, and Vietnam are presented in tables V-2 to V-4 and figures V-1 to V-3, along with U.S. producers' sales prices.¹¹

Importers reporting import purchase cost data were asked to provide additional information regarding the costs and benefits of directly importing paper file folders. Both *** provided responses. Two importers reported that they incurred additional costs beyond landed duty-paid costs by importing paper file folders directly rather than purchasing from a U.S. producer or U.S. importer. Of these, one importer (***) estimated the total additional cost incurred was 2.8 percent of the cost and identified this as a demurrage cost.

Firms were also asked to describe how these additional costs incurred by importing paper file folders directly compare with additional costs incurred when purchasing from a U.S. producer or U.S. importer. *** stated demurrage, overseas costs, inventory carrying costs, employee costs, etc. Importer *** stated that demurrage charges have been significant with the supply chain challenges and that if it was able to purchase the products domestically, this would not be an issue.

Importer *** reported that it compares costs of importing to the cost of purchasing from a U.S. producer in determining whether to import paper file folders, while importer *** compares costs to purchasing from a both U.S. producers and importers.

⁷ No importers reported usable price data. *** provided price data in its importers' questionnaire response, but only reported internal consumption/including own retail sale in its trade data. Staff has excluded this price data.

⁸ Importers *** did not provide any price or purchase cost data, reporting that they did not import the defined pricing products. A general search of their websites indicates that products that would be reported under pricing product 1 are either domestically produced or sold through a third-party vendor. See EDIS Document No. 784911.

⁹ No purchase cost data was reported for product 2 from China.

¹⁰ *** of purchase cost data was reported for imports of product 1 (***) and no purchase cost data was reported for products 2 and 3 from India.

¹¹ LDP import value does not include any potential additional costs that a purchaser may incur by importing rather than purchasing from another importer or U.S. producer. Price-cost differences are based on LDP import values whereas margins of underselling/overselling are based on importer sales prices.

Both importers identified benefits from importing paper file folders directly instead of purchasing from U.S. producers or importers. Importer *** reported benefits including price, delivery capabilities, greater control of the product development and supply chain process, and cost efficiency. Importer *** reported that it ***.

Firms were also asked whether the import cost (both excluding and including additional costs) of paper file folders they imported are lower than the price of purchasing paper file folders from a U.S. producer or importer. Importer *** reported that imports costs were lower both excluding and including additional costs for paper file folders while importer *** reported that only import costs excluding additional costs were lower than purchasing paper file folders from another firm.

Importer *** estimated that it saved approximately *** percent of the purchase price by importing paper file folders rather than purchasing from a U.S. producer or U.S. importer, and importer *** reported saving *** percent compared to purchasing the product from a U.S. producer.¹²

¹² One firm reported that it based its estimates on previous company transactions and two reported other bases for their estimates, including RFP process/direct quotes from U.S. producers.

Table V-2

Paper file folders: Import landed duty-paid purchase costs and domestic prices, quantities of product 1, and price-cost differentials, by quarter

Price and LDP value in dollars per box, quantity in boxes, price-cost differential in percent.

Period	US price	US quantity	China LDP unit cost	China quantity	China Price-cost differential	India LDP unit cost	India quantity	India Price-cost differential
2019 Q1	***	***	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***

Period	Vietnam LDP unit cost	Vietnam quantity	Vietnam Price-cost differential	Subject LDP unit cost	Subject quantity	Subject Price-cost differential
2019 Q1	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***

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

Note: Product 1: Box of 100 file folders, manila. See page V-3 for full description.

Figure V-1
Paper file folders: U.S. producer prices and import purchase costs, and quantities, of product 1, by quarter

U.S. price and import purchase cost of product 1

* * * * *

Volume of product 1

* * * * *

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

Note: Product 1: Box of 100 file folders, manila. See page V-3 for full description.

Table V-3

Paper file folders: Import landed duty-paid purchase costs and domestic prices, quantities of product 2, and price-cost differentials, by quarter

Price and LDP value in dollars per box, quantity in boxes, price-cost differential in percent.

Period	US price	US quantity	China LDP unit cost	China quantity	China Price-cost differential	India LDP unit cost	India quantity	India Price-cost differential
2019 Q1	***	***	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***

Period	Vietnam LDP unit cost	Vietnam quantity	Vietnam Price-cost differential	Subject LDP unit cost	Subject quantity	Subject Price-cost differential
2019 Q1	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***

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

Note: Product 2: Box of 25 hanging file folders, standard green. See page V-3 for full description.

Figure V-2
Paper file folders: U.S. producer prices and import purchase costs, and quantities, of product 2, by quarter

U.S. price and import purchase cost of product 2

* * * * *

Volume of product 2

* * * * *

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

Note: Product 2: Box of 25 hanging file folders, standard green. See page V-3 for full description.

Table V-4

Paper file folders: Import landed duty-paid purchase costs and domestic prices, quantities of product 3, and price-cost differentials, by quarter

Price and LDP value in dollars per box, quantity in boxes, price-cost differential in percent.

Period	US price	US quantity	China LDP unit cost	China quantity	China Price-cost differential	India LDP unit cost	India quantity	India Price-cost differential
2019 Q1	***	***	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***

Period	Vietnam LDP unit cost	Vietnam quantity	Vietnam Price-cost differential	Subject LDP unit cost	Subject quantity	Subject Price-cost differential
2019 Q1	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***

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

Note: Product 3: Box of 50 fastener folders, manila. See page V-4 for full description.

Figure V-3
Paper file folders: U.S. producer prices and import purchase costs, and quantities, of product 3, by quarter

U.S. price and import purchase cost of product 3

* * * * *

Volume of product 3

* * * * *

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

Note: Product 3: Box of 50 fastener folders, manila. See page V-4 for full description.

Price and purchase cost trends

In general, prices increased during January 2019-June 2022. Table V-5 summarizes the price trends, by country and by product. As shown in the table, domestic prices increased *** percent for product 1 and *** percent for product 2 and decreased *** percent for product 3 during January 2019-June 2022. Subject landed duty-paid costs increased *** percent for product 1.¹³

Table V-5
Paper file folders: Summary of price and cost data, by product and source

Volume in boxes, price and cost in dollars per boxes

Product	Source	Number of quarters	Volume of shipments	Low price/cost	High price/cost	First quarter price/cost	Last quarter price/cost	Percent change in price/cost over period
Product 1	United States	***	***	***	***	***	***	***
Product 1	China cost	***	***	***	***	***	***	***
Product 1	India cost	***	***	***	***	***	***	***
Product 1	Vietnam cost	***	***	***	***	***	***	***
Product 1	Subject sources cost	***	***	***	***	***	***	***
Product 2	United States	***	***	***	***	***	***	***
Product 2	China cost	***	***	***	***	***	***	***
Product 2	India cost	***	***	***	***	***	***	***
Product 2	Vietnam cost	***	***	***	***	***	***	***
Product 2	Subject sources cost	***	***	***	***	***	***	***
Product 3	United States	***	***	***	***	***	***	***
Product 3	China cost	***	***	***	***	***	***	***
Product 3	India cost	***	***	***	***	***	***	***
Product 3	Vietnam cost	***	***	***	***	***	***	***
Product 3	Subject sources cost	***	***	***	***	***	***	***

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

¹³ Trends could not be calculated by country as purchase cost data did not span the entire period of investigation for any single country. Purchase cost data was reported for imports from China from *** for product 1 and *** for product 3. Purchase cost data was reported for *** for product 1 from India. Purchase cost data from Vietnam was reported *** for product 1, *** for product 2, and *** for product 3.

Note: Percentage change from the first quarter in which data were available in 2019 to the last quarter in which data were available in 2022. Importer *** stated that it ***.

Purchase cost comparisons

As shown in table V-6, landed duty-paid costs for paper file folders imported from subject sources were below the sales price for U.S.-produced product in *** of *** instances (***) (***) boxes); price-cost differentials ranged from *** to *** percent. In the remaining *** instances (***) boxes), landed duty-paid costs for paper file folders from subject sources were between *** and *** percent above sales prices for the domestic product. Most of the volume in which the landed, duty-paid prices were lower was in product 1, which is equivalent to *** folders.

As shown in table V-7, landed duty-paid costs for paper file folders imported from China were below the sales price for U.S.-produced product in *** of *** instances (***) boxes); price-cost differentials ranged from *** to *** percent. In the remaining *** instances (***) boxes), landed duty-paid costs for paper file folders from China were between *** and *** percent above sales prices for the domestic product. Landed duty-paid costs for paper file folders imported from India were below the sales price for U.S.-produced product in *** (***) boxes); price-cost differential was *** percent. Landed duty-paid costs for paper file folders imported from Vietnam were below the sales price for U.S.-produced product in *** of *** instances (***) boxes); price-cost differentials ranged from *** to *** percent. In the remaining *** instances (***) boxes), landed duty-paid costs for paper file folders from Vietnam were between *** and *** percent above sales prices for the domestic product.

Table V-6
Paper file folders: Instances of lower and higher import purchase costs and the range and average of price-cost differentials, by product

Quantity in boxes; price-cost differential in percent

Product	Type	Number of quarters	Quantity	Average price-cost differential	Min price-cost differential	Max price-cost differential
Product 1	Lower than U.S. price	***	***	***	***	***
Product 2	Lower than U.S. price	***	***	***	***	***
Product 3	Lower than U.S. price	***	***	***	***	***
Total	Lower than U.S. price	***	***	***	***	***
Product 1	Higher than U.S. price	***	***	***	***	***
Product 2	Higher than U.S. price	***	***	***	***	***
Product 3	Higher than U.S. price	***	***	***	***	***
Total	Higher than U.S. price	***	***	***	***	***

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Table V-7
Paper file folders: Instances of lower and higher import purchase costs and the range and average of price-cost differentials, by source

Quantity in boxes; price-cost differential in percent

Source	Type	Number of quarters	Quantity	Average price-cost differential	Min price-cost differential	Max price-cost differential
China	Lower than U.S. price	***	***	***	***	***
India	Lower than U.S. price	***	***	***	***	***
Vietnam	Lower than U.S. price	***	***	***	***	***
Subject	Lower than U.S. price	***	***	***	***	***
China	Higher than U.S. price	***	***	***	***	***
India	Higher than U.S. price	***	***	***	***	***
Vietnam	Higher than U.S. price	***	***	***	***	***
Subject	Higher than U.S. price	***	***	***	***	***

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Lost sales and lost revenue

The Commission requested that U.S. producers of paper file folders report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of paper file folders from China, India, and Vietnam during January 2019-June 2022. Of the two responding U.S. producers, both reported that they had to reduce prices but did not roll back announced price increases, and both firms reported that they had lost sales. One U.S. producer, ***, submitted lost sales and lost revenue allegations, identifying two firms with which they lost sales. U.S. producer *** alleged that it ***. ***.

Staff contacted two purchasers, ***, and received responses from both purchasers. Responding purchasers reported purchasing *** paper file folders during January 2019-June 2022 (table V-8). During 2021, responding purchasers purchased *** percent from U.S. producers, *** percent from China, *** percent from India, *** percent from Vietnam, *** percent from nonsubject countries, and *** percent from “unknown source” countries.^{14 15}

¹⁴ Purchaser *** reported that its purchase data ***.

¹⁵ Purchaser *** reported purchasing *** folders from “unknown sources” purchased from ***.

Table V-8**Paper file folders: Purchasers' reported purchases and imports, by firm and source**

Quantity in 1,000 folders, share in percent

Purchaser	Domestic quantity	Subject quantity	All other quantity	Change in domestic share	Change in subject country share
***	***	***	***	***	***
***	***	***	***	***	***
Total	***	***	***	***	***

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

Note: All other includes all other sources and unknown sources. Change is the percentage point change in the share of the firm's total purchases of domestic and/or subject country imports between first and last years.

Purchasers were asked about changes in their purchasing patterns from different sources since 2019. Purchaser *** reported that its purchases for paper file folders imported from China and India fluctuated while its purchases of paper file folders from Vietnam increased, all due to "sourcing shifts". Purchaser *** reported that its purchases of domestically produced paper file folders and paper file folders from unknown sources decreased due to ongoing cost increases, increased purchases from India due to ***, and purchases from nonsubject sources (***) fluctuated based on demand.

Of the two responding purchasers, *** reported that, since 2019, they had purchased imported paper file folders from subject countries instead of U.S.-produced product; *** reported it did so for all subject countries and *** reported it did so for paper file folders imported from India. *** of these purchasers reported that subject import prices were lower than U.S.-produced product, and *** of these purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product. *** purchasers estimated the quantity of paper file folders from subject countries purchased instead of domestic product; quantities ranged from *** folders to *** folders (tables V-9 and V-10).

Of the two responding purchasers, *** reported that U.S. producers had not reduced prices in order to compete with lower-priced imports from *** and that it did not know for imports from ***; *** reported that it did not know with

respect to all subject countries. In describing the price reductions, *** reported that U.S. suppliers' prices increased, rather than decreased.

Table V-9
Paper file folders: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in 1,000 folders

Purchaser	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Explanation
***	***	***	***	***	***
***	***	***	***	***	***
All firms	Yes--2; No--0	Yes--2; No--0	Yes--2; No--0	***	***

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

Table V-10
Paper file folders: Purchasers' responses to purchasing subject imports instead of domestic product, by source

Quantity in 1,000 folders

Source	Count of purchasers reporting subject instead of domestic	Count of purchasers reported that imports were priced lower	Count of purchasers reporting that price was a primary reason for shift	Quantity
China	***	***	***	***
India	***	***	***	***
Vietnam	***	***	***	***
Any subject source	***	***	***	***

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

*** provided additional details on its purchases during the period of investigation. It stated that since 2019, it has purchased ***. It continued that ***. It added that

***. It stated that ***.

Respondent Staples stated that ***.¹⁶

¹⁶ Affidavit of Brad Young, Vice President of Product Development, Global Sourcing, Manufacturing & Operations, Staples, Inc., Respondents Staples, Navneet, Three-Color Stone Stationary, and Thrasio's postconference brief, Exhibit 2, at 8-10, and 12.

Part VI: Financial experience of U.S. producers

Background¹

Two U.S. producers (***) provided usable financial results on their paper file folders operations.² Both responding U.S. producers reported financial results on a calendar year basis and on the basis of GAAP.³

Figure VI-1 presents each responding firm's share of the total reported net sales quantity in 2021. Net sales consisted primarily of commercial sales, with *** U.S. producer (***) reporting internal consumption for all five periods for which data were collected.⁴ Non-commercial sales are included but not presented separately in this section of the report.

¹ The following abbreviations may be used in the tables and/or text of this section: generally accepted accounting principles ("GAAP"), fiscal year ("FY"), net sales ("NS"), January 2019 to June 2022 ("period examined"), January to June 2021 ("interim 2021"), January to June 2022 ("interim 2022"), cost of goods sold ("COGS"), selling, general, and administrative expenses ("SG&A expenses"), average unit values ("AUVs"), research and development expenses ("R&D expenses"), and return on assets ("ROA").

² *** submitted an unusable U.S. producer questionnaire and is not included in the aggregated financial data or in any narrative responses. ***'s net sales accounted for less than *** percent of total U.S. net sales in 2021.

³ Both companies reported fiscal years that end on December 31st.

⁴ ***.

Figure VI-1
Paper file folders: Share of net sales quantity in 2021, by firm

* * * * *

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

Operations on paper file folders

Table VI-1 presents aggregated data on U.S. producers' operations in relation to file folders, while table VI-2 presents corresponding changes in AUVs. Table VI-3 presents selected company-specific financial data.

Table VI-1
Paper file folders: Results of operations of U.S. producers, by item and period

Quantity in 1,000 folders; value in 1,000 dollars; ratios in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Raw materials	Value	***	***	***	***	***
COGS: Direct labor	Value	***	***	***	***	***
COGS: Other factory	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Other expense/(income), net	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Raw materials	Ratio to NS	***	***	***	***	***
COGS: Direct labor	Ratio to NS	***	***	***	***	***
COGS: Other factory	Ratio to NS	***	***	***	***	***
COGS: Total	Ratio to NS	***	***	***	***	***
Gross profit	Ratio to NS	***	***	***	***	***
SG&A expense	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table continued.

Table VI-1 Continued**Paper file folders: Results of operations of U.S. producers, by item and period**

Shares in percent; Unit values dollars per 1,000 folders; count in number of firms reporting

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
COGS: Raw materials	Share	***	***	***	***	***
COGS: Direct labor	Share	***	***	***	***	***
COGS: Other factory	Share	***	***	***	***	***
COGS: Total	Share	***	***	***	***	***
Total net sales	Unit value	***	***	***	***	***
COGS: Raw materials	Unit value	***	***	***	***	***
COGS: Direct labor	Unit value	***	***	***	***	***
COGS: Other factory	Unit value	***	***	***	***	***
COGS: Total	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	***	***	***	***	***

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

Note: Shares represent the share of COGS.

Table VI-2
Paper file folders: Changes in AUVs between comparison periods

Changes in percent

Item	2019-21	2019-20	2020-21	Jan-Jun 2021-22
Total net sales	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Raw materials	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Direct labor	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Other factory	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Total	▲ ***	▲ ***	▲ ***	▲ ***

Table continued.

Table VI-2 Continued
Paper file folders: Changes in AUVs between comparison periods

Changes per 1,000 folders

Item	2019-21	2019-20	2020-21	Jan-Jun 2021-22
Total net sales	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Raw materials	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Direct labor	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Other factory	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Total	▲ ***	▲ ***	▲ ***	▲ ***
Gross profit or (loss)	▼ ***	▲ ***	▼ ***	▲ ***
SG&A expense	▲ ***	▲ ***	▲ ***	▲ ***
Operating income or (loss)	▼ ***	▼ ***	▼ ***	▼ ***
Net income or (loss)	▼ ***	▼ ***	▼ ***	▼ ***

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

Table VI-3
Paper file folders: Firm-by-firm total net sales quantity, by period

Net sales quantity

Quantity in 1,000 folders

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
Paper file folders: Firm-by-firm total net sales value, by period

Net sales value

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
Paper file folders: Firm-by-firm cost of goods sold (“COGS”), by period

COGS

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
Paper file folders: Firm-by-firm gross profit or (loss), by period

Gross profit or (loss)

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
Paper file folders: Firm-by-firm selling, general, and administrative (“SG&A”) expenses, by period

SG&A expenses

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
Paper file folders: Firm-by-firm operating income or (loss), by period

Operating income or (loss)

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued**Paper file folders: Firm-by-firm net income or (loss), by period****Net income or (loss)**

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued**Paper file folders: Firm-by-firm ratio of COGS to net sales value, by period****COGS to net sales ratio**

Ratios in percent

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued**Paper file folders: Firm-by-firm ratio of gross profit or (loss) to net sales value, by period****Gross profit or (loss) to net sales ratio**

Ratios in percent

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued**Paper file folders: Firm-by-firm ratio of SG&A expenses to net sales value, by period****SG&A expenses to net sales ratio**

Ratios in percent

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued**Paper file folders: Firm-by-firm ratio of operating income or (loss) to net sales value, by period****Operating income or (loss) to net sales ratio**

Ratios in percent

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued**Paper file folders: Firm-by-firm ratio of net income or (loss) to net sales value, by period****Net income or (loss) to net sales ratio**

Ratios in percent

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued**Paper file folders: Firm-by-firm unit net sales value, by period****Unit net sales value**

Unit values dollars per 1,000 folders

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued**Paper file folders: Firm-by-firm unit raw material cost, by period****Unit raw material costs**

Unit values dollars per 1,000 folders

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued**Paper file folders: Firm-by-firm unit direct labor cost, by period****Unit direct labor costs**

Unit values dollars per 1,000 folders

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued**Paper file folders: Firm-by-firm unit other factory costs, by period****Unit other factory costs**

Unit values dollars per 1,000 folders

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued**Paper file folders: Firm-by-firm unit COGS, by period****Unit COGS**

Unit values dollars per 1,000 folders

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued**Paper file folders: Firm-by-firm unit gross profit or (loss), by period****Unit gross profit or (loss)**

Unit values dollars per 1,000 folders

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
Paper file folders: Firm-by-firm unit SG&A expenses, by period

Unit SG&A expenses

Unit values dollars per 1,000 folders

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
Paper file folders: Firm-by-firm unit operating income or (loss), by period

Unit operating income or (loss)

Unit values dollars per 1,000 folders

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued
Paper file folders: Firm-by-firm unit net income or (loss), by period

Unit net income or (loss)

Unit values dollars per 1,000 folders

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

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

Net sales

As presented in table VI-1, total net sales quantity and value fluctuated each year, decreasing overall from 2019 to 2021; interim 2022 net sales quantity was lower while net sales value was higher compared to interim 2021. Starting in 2020 and continuing through interim 2022, U.S. producers sold less paper file folders but at higher prices, with the highest net sales AUV occurring in interim 2022. Table VI-3 shows individual U.S. producer's net sales quantity and value trends *** from 2019 to 2021.^{5 6} Both U.S. producers reported lower sales volume in interim 2022 than in interim 2021, but *** in interim 2022 than in interim 2021. Differences in

⁵ TOPS ***. Response from *** to staff questions, November 9, 2022.

⁶ Smead ***. Response from *** to staff questions, November 9, 2022.

net sales between U.S. producers are largely attributable to differences in product mix as well as the impact of COVID-19 on sales of paper file folders starting in 2020.⁷

As presented in table VI-3, TOPS accounted for *** of net sales than Smead throughout the period examined which ***.⁸ As previously stated, net sales AUV variations between the two U.S. producers is largely attributable to product mix; Smead reported ***.⁹ The share of branded compared to private label paper file folders also contribute to the net sales AUV differences.¹⁰ Conference witnesses testified that paper file folders sold under its own brands (e.g., Smead brand or TOPS' Pendaflex) are valued higher than those sold as private labels (e.g., Walmart's Pen + Gear brand made by TOPS).^{11 12}

Cost of goods sold and gross profit or loss

As presented in table VI-1, raw material costs are the majority share of total COGS from 2019 to June 2022.¹³ Total raw material costs *** decreased in value from 2019 to 2021 (reflecting the decline in sales volume) but were higher in interim 2022 than in interim 2021. On a per-unit basis, total raw materials *** increased and were higher in interim 2022 than in interim 2021. As a share to net sales, total raw materials fluctuated within two percentage points from 2019 to 2021 and were slightly higher in interim 2021 than interim 2020. Table VI-3

⁷ For additional information on the effects of COVID-19 pandemic on financials, see table VI-12.

⁸ TOPS *** Response from *** to staff questions, November 9, 2022.

⁹ Smead reported selling *** unique paper file folder product SKUs (stock keeping unit) in 2021 while TOPS sold *** unique paper file folder product SKUs in 2021. U.S. producer questionnaires, III-5b.

Smead explained ***. Response from *** to staff questions, November 9, 2022.

¹⁰ "Private label" paper file folders are defined as paper file folders that "do not carry the brand name of the producer, but instead reflect a brand associated with the retailer" (e.g., Staples' TRUE RED brand made by TOPS) or a "generic" brand). Conference transcript, p. 20 (Avent) and p. 66 (Roberts).

Petitioners testified that private label paper file folders make up roughly half of U.S. consumption and are "typically slightly lower for the private label" (compared to the branded paper file folders sold under the Smead or the Pentaflex brands). Conference transcript, p. 66 (Roberts).

¹¹ Petitioners' postconference brief, exh. 26.

¹² Conference transcript, p. 70 (Roberts). Within the five data periods examined, TOPS reported that *** percent of sales were private labels while Smead reported that *** percent of its total sales were private label sales. *** to staff questions, November 9, 2022.

¹³ ***. Response from *** to staff questions, November 9, 2022.

presents company-specific raw material cost AUVs, with variations partially attributable to the large range of product mix.^{14 15 16} Table VI-4 presents raw materials, by type.

Table VI-4
Paper file folders: Raw material costs in 2021

Value in 1,000 dollars; share of value in percent

Item	Value	Share of value
Uncoated freesheet paper	***	***
Paperboard	***	***
Metal content	***	***
Plastic content	***	***
Other material inputs	***	***
All raw materials	***	***

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

Direct labor accounted for the second largest share of total COGS, *** decreasing in value as a result of the decline in net sales volume from 2019 to 2021; direct labor costs were lower in interim 2022 than in interim 2021. Other factory costs, which accounted for the smallest share of total COGS, *** increased from 2019 to 2021, and were higher in interim 2022 than in interim 2021. When measured as a ratio to total net sales, both direct labor and other factory costs increased overall from 2019 to 2021. For interim 2022, direct labor costs as a share of total net sales were lower while other factory costs were higher than interim 2021.

On a per-unit basis, both direct labor and other factory costs *** increased from 2019 to 2021 and were higher in interim 2022 than in interim 2021. Similar to raw materials, the differences of direct labor and other factory costs between Smead and TOPS is partly explained by variations in product mix and the ***.

As presented in table VI-1, total COGS *** decreased from 2019 to 2021 while the ratio of COGS to net sales *** increased over this period, reflecting the larger decline in net sales value as compared to COGS during this time. The AUVs of COGS *** increased from 2019 to 2021, reflecting the previously discussed increases in per-unit raw materials, direct labor, and other factory costs. Total COGS, the ratio of COGS to net sales, and AUVs of COGS were higher in interim 2022 than in interim 2021.

¹⁴ The differences in product mix include *** SKUs as noted earlier, with higher cost materials needed for certain paper file folders (e.g., hanging files that require metal pieces and expanding file folders that require additional manufacturing steps) than the lowest cost manila paper file folders. Petitioners' postconference brief, exh. 1, pp. 20-23.

¹⁵ Smead and TOPS ***. *** to staff questions, November 9, 2022.

¹⁶ ***. The classification of energy and utility costs by each individual U.S. producer ***. *** to staff questions, November 9, 2022.

Based on the data in table VI-1, the aggregated gross profit of U.S. producers *** decreased from 2019 to 2021; gross profit was lower in interim 2022 than in interim 2021. As a ratio to net sales, gross profit *** declined from 2019 to 2021 and was lower in interim 2022 than in interim 2021. The decline in gross profits reported by the U.S. industry reflects lower sales volume as well as revenue that declined more than COGS. Between the comparable interim periods, total gross profit and gross profit as a ratio to net sales were lower while the corresponding gross profit AUV was higher.

SG&A expenses and operating income or loss

As presented in table VI-1, U.S. producers' total SG&A expenses and AUVs of SG&A expenses increased from 2019 to 2021 and were higher in interim 2022 than in interim 2021. The SG&A expense ratio (i.e., total SG&A expenses divided by net sales) also increased from 2019 to 2021 but remained the same in both interim periods. Table IV-4 shows that *** reported higher SG&A expenses throughout all five data periods examined.¹⁷

Table VI-1 shows that U.S. producers' operating income declined *** from 2019 to 2021 and was lower in interim 2022 than in interim 2021, with *** reported in both interim periods. The declines in operating performance of U.S. producers are attributable to the same reasons as those for gross profit from 2019 to 2021 (i.e., sales volume declined, and sales prices increased less than total COGS) as well as the additional increases in SG&A expenses.

All other expenses and net income or loss

Classified below the operating income level are interest expenses, other expenses, and other income. In table VI-1, these items are aggregated and only the net amount is shown. Table VI-1 shows that net all other expenses and income decreased from 2019 to 2021 but were higher in interim 2022 than in interim 2021.

Net income had a similar pattern as operating income: the industry reported declining net income from 2019 to 2021; net losses were reported in both interim periods, with the net loss higher in interim 2022 than in interim 2021. The absolute difference between operating and net profits narrowed and widened in conjunction with changes in total interest expenses and all other income and expenses.¹⁸

¹⁷ ***. Response from *** to staff questions, November 9, 2022.

¹⁸ A variance analysis is not shown mostly due to large differences in product mix as well as the production of other products. These differences result in wide variations in the costs allocated to file folder operations as well as the different cost structures among the reporting firms.

Capital expenditures and R&D expenses

Table VI-5 presents capital expenditures, by firm, and table VI-7 presents R&D expenses, by firm. Tables VI-6 and VI-8 present the firms' narrative explanations of the nature, focus, and significance of their capital expenditures and R&D expenses, respectively.

Table VI-5
Paper file folders: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

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

Table VI-6
Paper file folders: Narrative descriptions of U.S. producers' capital expenditures, by firm

Firm	Narrative on capital expenditures
Smead	***
TOPS	***

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

Table VI-7
Paper file folders: U.S. producers' R&D expenses, by firm and period

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Smead	***	***	***	***	***
TOPS	***	***	***	***	***
All firms	***	***	***	***	***

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

Table VI-8
Paper file folders: Narrative descriptions of U.S. producers' R&D expenses, by firm

Firm	Narrative on R&D expenses
Smead	***
TOPS	***

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

Assets and return on assets

Table VI-9 presents data on the U.S. producers' total assets while table VI-10 presents their operating ROA.¹⁹ Table VI-11 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time.

Table VI-9
Paper file folders: U.S. producers' total net assets, by firm and period

Value in 1,000 dollars

Firm	2019	2020	2021
Smead	***	***	***
TOPS	***	***	***
All firms	***	***	***

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

Table VI-10
Paper file folders: U.S. producers' ROA, by firm and period

Ratio in percent

Firm	2019	2020	2021
Smead	***	***	***
TOPS	***	***	***
All firms	***	***	***

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

Table VI-11
Paper file folders: Narrative descriptions of U.S. producers' total net assets, by firm

Firm	Narrative on assets
Smead	***
TOPS	***

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

¹⁹ The operating ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value on a product-specific basis.

COVID-19 and financial performance

Table VI-12 presents the U.S. producers' narrative responses regarding the effects of COVID-19 on their financial performance.

Table VI-12

Paper file folders: Narrative responses relating to COVID-19 pandemic effects on U.S. producers' financial performance, since January 1, 2020

Firm	Narrative response on COVID-19
Smead	***
TOPS	***

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

Capital and investment

The Commission requested U.S. producers of file folders to describe any actual or potential negative effects of imports of paper file folders from China, India, and/or Vietnam on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table VI-13 presents the number of firms reporting an impact in each category and table VI-14 provides the U.S. producers' narrative responses.

Table VI-13

Paper paper file folders: Count of firms indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2019, by effect

Number of firms reporting

Effect	Category	Count
Cancellation, postponement, or rejection of expansion projects	Investment	***
Denial or rejection of investment proposal	Investment	***
Reduction in the size of capital investments	Investment	***
Return on specific investments negatively impacted	Investment	***
Other investment effects	Investment	***
Any negative effects on investment	Investment	***
Rejection of bank loans	Growth	***
Lowering of credit rating	Growth	***
Problem related to the issue of stocks or bonds	Growth	***
Ability to service debt	Growth	***
Other growth and development effects	Growth	***
Any negative effects on growth and development	Growth	***
Anticipated negative effects of imports	Future	***

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

Table VI-14**Paper file folders: Narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2019**

Item	Firm name and narrative on impact of imports
Reduction in the size of capital investments	***
Other negative effects on investments	***
Other negative effects on investments	***
Other effects on growth and development	***
Other effects on growth and development	***
Anticipated effects of imports	***
Anticipated effects of imports	***

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

Part VII: Threat considerations and information on nonsubject countries

Section 771(7)(F)(i) of the Act (19 U.S.C. § 1677(7)(F)(i)) provides that—

In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors¹--

- (I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,*
- (II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,*
- (III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,*
- (IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports,*
- (V) inventories of the subject merchandise,*

¹ Section 771(7)(F)(ii) of the Act (19 U.S.C. § 1677(7)(F)(ii)) provides that “The Commission shall consider {these factors} . . . as a whole in making a determination of whether further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted under this title. The presence or absence of any factor which the Commission is required to consider . . . shall not necessarily give decisive guidance with respect to the determination. Such a determination may not be made on the basis of mere conjecture or supposition.”

- (VI) *the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products,*
- (VII) *in any investigation under this title which involves imports of both a raw agricultural product (within the meaning of paragraph (4)(E)(iv)) and any product processed from such raw agricultural product, the likelihood that there will be increased imports, by reason of product shifting, if there is an affirmative determination by the Commission under section 705(b)(1) or 735(b)(1) with respect to either the raw agricultural product or the processed agricultural product (but not both),*
- (VIII) *the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and*
- (IX) *any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).²*

Information on the nature of the alleged subsidies was presented earlier in this report; information on the volume and pricing of imports of the subject merchandise is presented in Parts IV and V; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in Part VI. Information on inventories of the subject merchandise; foreign producers' operations, including the potential for "product-shifting;" any other threat indicators, if applicable; and any dumping in third-country markets, follows. Also presented in this section of the report is information obtained for consideration by the Commission on nonsubject countries.

² Section 771(7)(F)(iii) of the Act (19 U.S.C. § 1677(7)(F)(iii)) further provides that, in antidumping investigations, ". . . the Commission shall consider whether dumping in the markets of foreign countries (as evidenced by dumping findings or antidumping remedies in other WTO member markets against the same class or kind of merchandise manufactured or exported by the same party as under investigation) suggests a threat of material injury to the domestic industry."

The industry in China

The Commission issued foreign producers' or exporters' questionnaires to 37 firms believed to produce and/or export paper file folders from China.³ A usable response to the Commission's questionnaire were received from Guangbo Import & Export Company ("Guangbo"). Guangbo's exports to the United States accounted for approximately *** percent of U.S. imports of paper file folders from China in 2021. Guangbo was unable to provide an estimate its share of total production of paper file folders in China. Table VII-1 presents information on Guangbo's operations China.

Table VII-1
Paper file folders: Summary data for Chinese producer Guangbo, 2021

Quantity in 1,000 folders; share in percent

Firm	Production (1,000 folders)	Share of reported production (percent)	Exports to the United States (1,000 folders)	Share of reported exports to the United States (percent)	Total shipments (1,000 folders)	Share of firm's total shipments exported to the United States (percent)
Guangbo	***	100.0	***	100.0	***	***
All firms	***	100.0	***	100.0	***	***

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

Changes in operations

Guangbo was asked to report any change in the character of their operations or organization relating to the production of paper file folders since 2019. Table VII-2 presents the changes in operations identified by Guangbo.

Table VII-2
Paper file folders: Reported changes in operations by Chinese producer Guangbo since January 1, 2019

Item	Firm name and accompanying narrative response
Plant closings	***

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

³ These firms were identified through a review of information submitted in the petition and presented in third-party sources.

Operations on paper file folders

Table VII-3 presents Guangbo's installed and practical overall capacity and production on the same equipment used to produce paper file folders.

Table VII-3
Paper file folders: Guangbo's installed overall capacity, practical overall capacity, and overall production on same equipment as subject production, by period

Quantity in 1,000 folders; share and ratio in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical paper file folders	Capacity	***	***	***	***	***
Practical paper file folders	Production	***	***	***	***	***
Practical paper file folders	Utilization	***	***	***	***	***

Source: Compiled from data submitted in response to Commission's questionnaires

Note: Installed overall production capacity is the level of production that a firm's establishment(s) could have attained, assuming the firm's optimal product mix, and based solely on existing capital investments, i.e., machinery and equipment that is in place and ready to operate. This capacity measure does not account for other constraints to production such as existing workforce constraints, availability of raw materials, or downtime for maintenance, repair, and clean-up. This capacity measure is sometimes referred to as "nameplate" or "theoretical" capacity in some industries.

Note: Practical overall production capacity is the level of production that a firm's establishment(s) could reasonably have expected to attain, accounting for the firm's actual product mix over the period for which data were collected. This capacity measure is based on not only existing capital investments, i.e., machinery and equipment that is in place and ready to operate but also non-capital investment constraints, such as (1) normal operating conditions, including normal downtime for maintenance, repair, and cleanup; (2) the firm's existing in-place and readily available labor force; (3) availability of material inputs; and (4) any other constraints that may have limited the firm's ability to produce the reported products. Importantly, this capacity measure is the maximum "practical" production a firm could have achieved without hiring new personnel or expanding the number of shifts operated in the period.

Table VII-4 presents data on Guangbo’s paper file folder operations in China.⁴ Guangbo’s practical production capacity fluctuated year to year, increasing by *** from 2019 to 2020, then decreasing by *** percent from 2020 to 2021, ending *** percent higher in 2021 than in 2019. Guangbo’s practical production capacity was *** percent lower in interim 2022 than in interim 2021.⁵ Its practical production capacity is projected to *** from interim 2022 to the end of 2022 and *** in 2023 due to the firm ***.⁶

Table VII-4
Paper file folders: Data on Chinese producer Guangbo’s operations, by period

Quantity in 1,000 folders

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022	Projection 2022	Projection 2023
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	***	***	***	***	***	***	***
Exports to the United States	***	***	***	***	***	***	***
Exports to all other markets	***	***	***	***	***	***	***
Export shipments	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***

Table continued.

⁴ ***.

⁵ The lower level of capacity in interim 2022 compared with interim 2021 ***.

⁶ ***. Guangbo’s Response to Additional ITC Questions, p. 1.

Table VII-4 Continued
Paper file folders: Data on Chinese producer Guangbo’s operations, by period

Ratio and share in percent

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022	Projection 2022	Projection 2023
Capacity utilization ratio	***	***	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***	***	***
Internal consumption share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	***	***	***	***	***	***	***
Exports to the United States share	***	***	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***	***	***
Export shipments share	***	***	***	***	***	***	***
Total shipments share	100.0	100.0	100.0	100.0	100.0	100.0	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

Guangbo’s production moved in the same direction as its capacity, increasing by *** from 2019 to 2020, then decreasing by *** percent from 2020 to 2021, ending *** percent higher in 2021 than in 2019. Guangbo’s production was *** percent lower in interim 2022 than in interim 2021.⁷ Its production is projected to *** from interim 2022 to the end of 2022 and *** in 2023 due to the firm ***. Guangbo’s capacity utilization experienced a modest change, decreasing from *** percent in 2019 to *** percent in 2021. It was *** percent in interim 2022, compared with *** percent in interim 2021. It is projected to *** from interim 2022 to the end of 2022 and *** percent in 2023 due to the firm ***.⁸

⁷ ***. Ibid.

⁸ Ibid.

Export shipments to the United States accounted for *** of Guangbo’s shipments during the period for which data were collected. The quantity of Guangbo’s export shipments to the United States moved in the same direction as its production, increasing by *** percent from 2019 to 2020, then decreasing by *** percent from 2020 to 2021, ending *** percent higher in 2021 than in 2020. Guangbo’s export shipments to the United States were *** percent lower in interim 2022 than in interim 2021. It is projected to *** from interim 2022 to the end of 2022 and *** in 2023 due to the firm ***.⁹

Table VII-5 presents Guangbo’s reported narratives regarding practical production constraints.

Table VII-5
Paper file folders: Guangbo’s narrative responses regarding practical production constraints, since January 1, 2019

Item	Firm name and narrative response on production constraints
Production bottlenecks	***
Existing labor force	***
Supply of material inputs	***
Fuel or energy	***
Logistics/transportation	***

Source: Compiled from data submitted in response Commission questionnaires.

Alternative products

Guangbo did not report production on other products on the same equipment used to produce paper file folders.

⁹ Guangbo’s Response to Additional ITC Questions, p. 1.

Exports

Table VII-6 presents data for exports of binders (other than book covers, folder and file covers of paper or paperboard) (“binders”), which includes paper file folders, from China in descending order of value for 2021. The United States was the leading export market for binders from China in 2021, by value, accounting for 18.0 percent. Australia, Japan, and the United Kingdom were the next largest export markets in 2021, by value, accounting for 12.1 percent, 7.9 percent, and 5.1 percent, respectively.

Table VII-6
Binders: Exports from China, by destination market and period

Value in 1,000 dollars; share in percent

Destination market	Measure	2019	2020	2021
United States	Value	45,832	26,495	23,898
Australia	Value	8,129	11,303	16,127
Japan	Value	11,071	11,666	10,535
United Kingdom	Value	7,776	6,362	6,826
Hong Kong	Value	4,854	5,619	5,107
Germany	Value	2,987	3,910	4,034
Canada	Value	2,660	2,807	3,503
Netherlands	Value	4,170	4,464	2,826
New Zealand	Value	2,105	1,141	2,749
All other destination markets	Value	76,138	50,665	57,420
All destination markets	Value	165,722	124,433	133,025
United States	Share	27.7	21.3	18.0
Australia	Share	4.9	9.1	12.1
Japan	Share	6.7	9.4	7.9
United Kingdom	Share	4.7	5.1	5.1
Hong Kong	Share	2.9	4.5	3.8
Germany	Share	1.8	3.1	3.0
Canada	Share	1.6	2.3	2.6
Netherlands	Share	2.5	3.6	2.1
New Zealand	Share	1.3	0.9	2.1
All other destination markets	Share	45.9	40.7	43.2
All destination markets	Share	100.0	100.0	100.0

Source: Official export statistics under HS subheading 4820.30, as reported by China Customs in the Global Trade Atlas database, accessed October 27, 2022.

Note: United States is shown at the top. All remaining top export destinations are shown in descending order of 2021 data. HS subheading 4820.30 is a basket category that contains products outside the scope of these investigations.

The industry in India

The Commission issued foreign producers' or exporters' questionnaires to nine firms believed to produce and/or export paper file folders from India.¹⁰ A usable response to the Commission's questionnaire were received from Navneet Education Limited ("Navneet").¹¹ Navneet was unable to provide an estimate its share of total production of paper file folders in India. Table VII-7 presents information on Navneet's operations in India.

Table VII-7
Paper file folders: Summary data for Indian producer Navneet, 2021

Quantity in 1,000 folders; share in percent

Firm	Production (1,000 folders)	Share of reported production (percent)	Exports to the United States (1,000 folders)	Share of reported exports to the United States (percent)	Total shipments (1,000 folders)	Share of firm's total shipments exported to the United States (percent)
Navneet	***	100.0	***	100.0	***	***
All firms	***	100.0	***	100.0	***	***

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

Changes in operations

Navneet was asked to report any change in the character of their operations or organization relating to the production of paper file folders since 2019. Table VII-8 presents the changes in operations identified by Navneet.

Table VII-8
Paper file folders: Reported changes in operations by Indian producer Navneet since January 1, 2019

Item	Firm name and accompanying narrative response
Expansions	***

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

¹⁰ These firms were identified through a review of information submitted in the petitions and presented in third-party sources.

¹¹ The Commission also received an incomplete response from ***, which reported production of *** folders in 2021.

Operations on paper file folders

Table VII-9 presents Navneet's installed and practical overall capacity and production on the same equipment used to produce paper file folders.

Table VII-9
Paper file folders: Indian producer Navneet's installed overall capacity, practical overall capacity, and overall production on same equipment as subject production, by period

Quantity in 1,000 folders; ratio and share in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical paper file folders	Capacity	***	***	***	***	***
Practical paper file folders	Production	***	***	***	***	***
Practical paper file folders	Utilization	***	***	***	***	***

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

Note: Installed overall production capacity is the level of production that a firm's establishment(s) could have attained, assuming the firm's optimal product mix, and based solely on existing capital investments, i.e., machinery and equipment that is in place and ready to operate. This capacity measure does not account for other constraints to production such as existing workforce constraints, availability of raw materials, or downtime for maintenance, repair, and clean-up. This capacity measure is sometimes referred to as "nameplate" or "theoretical" capacity in some industries.

Note: Practical overall production capacity is the level of production that a firm's establishment(s) could reasonably have expected to attain, accounting for the firm's actual product mix over the period for which data were collected. This capacity measure is based on not only existing capital investments, i.e., machinery and equipment that is in place and ready to operate but also non-capital investment constraints, such as (1) normal operating conditions, including normal downtime for maintenance, repair, and cleanup; (2) the firm's existing in-place and readily available labor force; (3) availability of material inputs; and (4) any other constraints that may have limited the firm's ability to produce the reported products. Importantly, this capacity measure is the maximum "practical" production a firm could have achieved without hiring new personnel or expanding the number of shifts operated in the period.

Table VII-10 presents data on Navneet’s paper file folders operations in India. After *** from 2019 to 2020, Navneet’s production capacity increased by *** percent from 2020 to 2021.¹² It was *** higher in interim 2022 than in interim 2021.¹³ Navneet’s production capacity is projected to be *** percent higher in 2022 than in 2021 and *** from 2022 to 2023.

Table VII-10
Paper file folders: Data on Indian producer Navneet’s operations, by period

Quantity in 1,000 folders

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022	Projection 2022	Projection 2023
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	***	***	***	***	***	***	***
Exports to the United States	***	***	***	***	***	***	***
Exports to all other markets	***	***	***	***	***	***	***
Export shipments	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***

Table continued.

¹² ***. Email from ***, October 31, 2022.

¹³ ***. Ibid.

Table VII-10 Continued
Paper file folders: Data on Indian producer Navneet's operations, by period

Ratio and share in percent

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022	Projection 2022	Projection 2023
Capacity utilization ratio	***	***	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***	***	***
Internal consumption share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	***	***	***	***	***	***	***
Exports to the United States share	***	***	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***	***	***
Export shipments share	***	***	***	***	***	***	***
Total shipments share	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

Navneet's production fluctuated year to year, decreasing by *** percent from 2019 to 2020, then increasing by *** percent from 2020 to 2021, ending *** percent higher in 2021 than in 2019. Navneet's production was *** higher in interim 2022 than in interim 2021. It is projected to be *** percent higher in 2022 than in 2021 and *** percent lower in 2023 than in 2022. Navneet's capacity utilization fluctuated year to year, decreasing from *** percent in 2019 to *** percent in 2020, then increasing to *** percent in 2021. It was *** percent in interim 2022, compared with *** percent in interim 2021. Navneet's capacity utilization is projected to be *** percent in 2022 and *** percent in 2023.

Export shipments accounted for *** of Navneet’s shipments during the period for which data were collected, with *** of its exports going to the United States.¹⁴ Navneet’s export shipments to the United States fluctuated year to year, decreasing by *** percent from 2019 to 2020, then increasing by *** percent from 2020 to 2021, ending *** percent higher in 2021 than in 2019.¹⁵ It was *** higher in interim 2022 than in interim 2021. Navneet’s exports to the United States are projected to be *** higher in 2022 than in 2021 and *** from 2022 to 2023.¹⁶

Table VII-11 presents Navneet’s reported narratives regarding practical production constraints.

Table VII-11
Paper file folders: Navneet’s narrative responses regarding practical production constraints, since January 1, 2019

Item	Firm name and narrative response on production constraints
Other constraints	***

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

Alternative products

As shown in table VII-12, paper file folders accounted for *** of Navneet’s total production on shared equipment in each year during 2019-21 and in interim 2022. Navneet reported producing *** on the shared machinery.

¹⁴ Navneet reported ***.

¹⁵ Navneet reported that *** Email from ***, October 31, 2022.

¹⁶ Navneet’s projections for 2022 and 2023 were based on ***. Ibid.

Table VII-12**Paper file folders: Indian producer Navneet's overall production on the same equipment as subject production, by period**

Quantity in 1,000 folders; Share in percent

Production type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Paper file folders	Quantity	***	***	***	***	***
Excluded folders	Quantity	***	***	***	***	***
Other	Quantity	***	***	***	***	***
All out-of-scope production	Quantity	***	***	***	***	***
All production	Quantity	***	***	***	***	***
Paper file folders	Share	***	***	***	***	***
Excluded folders	Share	***	***	***	***	***
Other	Share	***	***	***	***	***
All out-of-scope production	Share	***	***	***	***	***
All production	Share	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

Exports

Table VII-13 presents data for exports of binders, which includes paper file folders, from India in descending order of value for 2021. The United States was the leading export market for binders from India in 2021, by value, accounting for 82.3 percent. The United States was the only market to account for more than 2.1 percent of exports of binders from India, by value, in 2021.

Table VII-13
Binders: Exports from India, by destination market and period

Value in 1,000 dollars; share in percent

Destination market	Measure	2019	2020	2021
United States	Value	4,980	5,001	6,478
Saudi Arabia	Value	72	101	163
Yemen	Value	90	180	128
Burkina Faso	Value	98	83	112
Kenya	Value	86	21	105
Bhutan	Value	51	75	98
Zambia	Value	113	13	93
Senegal	Value	48	14	73
Greece	Value	789	63	72
All other destination markets	Value	1,088	614	551
All destination markets	Value	7,415	6,165	7,872
United States	Share	67.2	81.1	82.3
Saudi Arabia	Share	1.0	1.6	2.1
Yemen	Share	1.2	2.9	1.6
Burkina Faso	Share	1.3	1.3	1.4
Kenya	Share	1.2	0.3	1.3
Bhutan	Share	0.7	1.2	1.2
Zambia	Share	1.5	0.2	1.2
Senegal	Share	0.7	0.2	0.9
Greece	Share	10.6	1.0	0.9
All other destination markets	Share	14.7	10.0	7.0
All destination markets	Share	100.0	100.0	100.0

Source: Official export statistics under HS subheading 4820.30, as reported by India Customs in the Global Trade Atlas database, accessed October 27, 2022.

Note: United States is shown at the top. All remaining top export destinations are shown in descending order of 2021 data. HS subheading 4820.30 is a basket category that contains products that are outside the scope of these investigations.

The industry in Vietnam

The Commission issued foreign producers' or exporters' questionnaires to seven firms believed to produce and/or export paper file folders from Vietnam.¹⁷ Usable responses to the Commission's questionnaire were received from Fairton Asia Limited ("Fairton Asia") and Three-Color Stone Stationery ("Three-Color"). Three-Color estimates that it accounted for approximately 20 percent of total production of paper file folders in Vietnam in 2021, while Fairton Asia did not provide an estimate of its share of production in 2021. Table VII-14 presents information on the paper file folders operations of the responding producers and exporters in Vietnam.

Table VII-14
Paper file folders: Summary data for producers in Vietnam, 2021

Quantity in 1,000 folders; share in percent

Firm	Production (1,000 folders)	Share of reported production (percent)	Exports to the United States (1,000 folders)	Share of reported exports to the United States (percent)	Total shipments (1,000 folders)	Share of firm's total shipments exported to the United States (percent)
Fairton Asia Limited	***	***	***	***	***	***
Three-Color	***	***	***	***	***	***
All firms	***	100.0	***	100.0	***	***

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

¹⁷ These firms were identified through a review of information submitted in the petitions and presented in third-party sources.

Changes in operations

Producers in Vietnam were asked to report any change in the character of their operations or organization relating to the production of paper file folders since 2019.

Table VII-15 presents the changes identified by responding producers in Vietnam

Table VII-15

Paper file folders: Reported changes in operations by producers in Vietnam since January 1, 2019

Item	Firm name and accompanying narrative response
Plant openings	***
Plant openings	***
Relocations	***
Expansions	***

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

Operations on paper file folders

Table VII-16 presents responding producers' installed and practical overall capacity and production on the same equipment used to produce paper file folders in Vietnam.

Table VII-16**Paper file folders: Foreign producers' overall capacity and production on the same equipment as subject production in Vietnam, by period**

Quantity in 1,000 folders; share in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical paper file folders	Capacity	***	***	***	***	***
Practical paper file folders	Production	***	***	***	***	***
Practical paper file folders	Utilization	***	***	***	***	***

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

Note: Installed overall production capacity is the level of production that a firm's establishment(s) could have attained, assuming the firm's optimal product mix, and based solely on existing capital investments, i.e., machinery and equipment that is in place and ready to operate. This capacity measure does not account for other constraints to production such as existing workforce constraints, availability of raw materials, or downtime for maintenance, repair, and clean-up. This capacity measure is sometimes referred to as "nameplate" or "theoretical" capacity in some industries.

Note: Practical overall production capacity is the level of production that a firm's establishment(s) could reasonably have expected to attain, accounting for the firm's actual product mix over the period for which data were collected. This capacity measure is based on not only existing capital investments, i.e., machinery and equipment that is in place and ready to operate but also non-capital investment constraints, such as (1) normal operating conditions, including normal downtime for maintenance, repair, and cleanup; (2) the firm's existing in-place and readily available labor force; (3) availability of material inputs; and (4) any other constraints that may have limited the firm's ability to produce the reported products. Importantly, this capacity measure is the maximum "practical" production a firm could have achieved without hiring new personnel or expanding the number of shifts operated in the period.

Table VII-17 presents data on the paper file folders operations of the responding producers and exporters in Vietnam. ***.¹⁸ *** production capacity increased by *** percent from 2020 to 2021, while *** capacity ***. Responding producers' collective capacity in Vietnam was *** higher in interim 2022 than in interim 2021, with ***.¹⁹ It is projected to be *** higher in 2022 than in 2021 but *** percent lower in 2023 than in 2022.

¹⁸ ***. As discussed previously, ***.

¹⁹ The difference in the capacity between interim 2021 and interim 2022 reflects ***

Responding producers' production in Vietnam increased by *** percent from 2020 to 2021, with both firms reporting an increase during that period. Their production in Vietnam was *** higher in interim 2022 than in interim 2021.²⁰ It is projected to be *** higher in 2022 than in 2021, but *** percent lower in 2023 than in 2022.²¹ Responding producers' capacity utilization increased from *** percent in 2020 to *** percent in 2021. It was a period-high *** percent in interim 2022, compared with *** percent in interim 2021.

Table VII-17
Paper file folders: Data on industry in Vietnam, by period

Quantity in 1,000 folders

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022	Projection 2022	Projection 2023
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	***	***	***	***	***	***	***
Exports to the United States	***	***	***	***	***	***	***
Exports to all other markets	***	***	***	***	***	***	***
Export shipments	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***

Table continued.

***. ***, p. 2 and email from ***, November 3, 2021.

²⁰ The difference in production between interim 2021 and interim 2022 reflects ***. Fairton Asia Limited Response to Additional ITC Questions, p. 2 and email from ***, November 3, 2021.

²¹ The lower projection for 2023 compared with 2022 is due to ***.

Table VII-17 Continued
Paper file folders: Data on industry in Vietnam, by period

Ratio and share in percent

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022	Projection 2022	Projection 2023
Capacity utilization ratio	***	***	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***	***	***
Internal consumption share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	***	***	***	***	***	***	***
Exports to the United States share	***	***	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***	***	***
Export shipments share	***	***	***	***	***	***	***
Total shipments share	***	100.0	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

Export shipments to the United States accounted for *** of the responding producers’ shipments during the period for which data were collected. The quantity of responding producers’ export shipments to the United States moved in the same direction as their production, increasing by *** percent from 2020 to 2021. It was *** higher in interim 2022 than in interim 2021.²² It is projected to be *** higher in 2022 than in 2021, but *** percent lower in 2023 than in 2022.²³

²² The difference in exports shipments to the United States between interim 2021 and interim 2022 reflects ***. ***, p. 2 and email from ***, November 3, 2021.

²³ The lower projection for 2023 compared with 2022 is due to ***.

Table VII-18 presents responding producers' reported narratives regarding practical production constraints.

Table VII-18

Paper file folders: Foreign producers' narratives regarding production constraints in Vietnam

Item	Firm name and narrative response on production constraints
Production bottlenecks	***
Existing labor force	***
Existing labor force	***
Supply of material inputs	***
Fuel or energy	***
Storage capacity	***
Logistics/transportation	***
Logistics/transportation	***

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

Alternative products

As shown in table VII-19, paper file folders accounted for the majority of total production on shared equipment in 2020, 2021, and interim 2022. ***. ***.

Table VII-19

Paper file folders: Producers in Vietnam overall capacity and production on the same equipment as subject production, by period

Quantity in 1,000 folders; ratio and share in percent

Production type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Paper file folders	Quantity	***	***	***	***	***
Excluded folders	Quantity	***	***	***	***	***
Other	Quantity	***	***	***	***	***
All out-of-scope production	Quantity	***	***	***	***	***
All production	Quantity	***	***	***	***	***
Paper file folders	Share	***	***	***	***	***
Excluded folders	Share	***	***	***	***	***
Other	Share	***	***	***	***	***
All out-of-scope production	Share	***	***	***	***	***
All production	Share	***	100.0	100.0	100.0	100.0

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

Exports

Table VII-20 presents data for exports of binders, which includes paper file folders, from Vietnam in descending order of value for 2021. The leading export market for binders from Vietnam in 2021, by value, was the United States, accounting for 49.7 percent. No other market accounted for more than 0.5 percent of exports from Vietnam, by value, in 2021.

Table VII-20
Binders: Exports from Vietnam, by destination and period

Value in 1,000 dollars; share in percent

Destination market	Measure	2019	2020	2021
United States	Value	6,231	27,229	30,727
Mexico	Value	---	31	287
Canada	Value	18	33	200
China	Value	93	90	188
Italy	Value	---	---	99
Lithuania	Value	---	---	31
Singapore	Value	2	2	27
Hong Kong	Value	24	86	27
Australia	Value	6	5	17
All other destination markets	Value	36,244	36,165	30,270
All destination markets	Value	42,618	63,642	61,871
United States	Share	14.6	42.8	49.7
Mexico	Share	---	0.0	0.5
Canada	Share	0.0	0.1	0.3
China	Share	0.2	0.1	0.3
Italy	Share	---	---	0.2
Lithuania	Share	---	---	0.1
Singapore	Share	0.0	0.0	0.0
Hong Kong	Share	0.1	0.1	0.0
Australia	Share	0.0	0.0	0.0
All other destination markets	Share	85.0	56.8	48.9
All destination markets	Share	100.0	100.0	100.0

Source: Official export statistics under HS subheading 4820.30 as reported by various statistical reporting authorities in the Global Trade Atlas database, accessed October 27, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top. All remaining top export destinations are shown in descending order of 2021 data. HS subheading 4820.30 is a basket category that contains products that are outside the scope of these investigations.

Subject countries combined

Table VII-21 presents summary data on paper file folders operations of the reporting subject producers in the subject countries.

Table VII-21
Paper file folders: Data on the industry in subject countries, by period

Quantity in 1,000 folders

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022	Projection 2022	Projection 2023
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	***	***	***	***	***	***	***
Exports to the United States	***	***	***	***	***	***	***
Exports to all other markets	***	***	***	***	***	***	***
Export shipments	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***

Table continued.

Table VII-21 Continued
Paper file folders: Data on the industry in subject countries, by period

Ratio and share in percent

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022	Projection 2022	Projection 2023
Capacity utilization ratio	***	***	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***	***	***
Internal consumption share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	***	***	***	***	***	***	***
Exports to the United States share	***	***	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***	***	***
Export shipments share	***	***	***	***	***	***	***
Total shipments share	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

U.S. inventories of imported merchandise

Table VII-22 presents data on responding U.S. importers' reported end-of-period inventories of paper file folders. Responding U.S. importers' end-of-period inventories of imports from China decreased by *** percent from 2019 to 2021. End-of-period inventories of imports from Vietnam were present only during 2020-21, increasing by *** during that period. Responding U.S. importers' end-of-period inventories from China and Vietnam were *** percent and *** percent higher, respectively, in interim 2022 than in interim 2021. There were no end-of-period inventories of imports from India during 2019-21 and in interim 2022. Overall, end-of-period inventories of subject imports increased by *** from 2019 to 2021 and was *** higher in interim 2022 than in interim 2021.

The ratio of responding U.S. importers' end-of-period inventories to their imports from China increased from *** percent in 2019 to *** percent in 2021 and the ratio of their end-of-period inventories to their imports from Vietnam increased from *** percent in 2020 to *** percent in 2021. The ratio of responding U.S. importers' end-of-period inventories to their imports from China was *** percent in interim 2022, compared with *** percent in interim 2021. The ratio of their end-of-period inventories to their imports from Vietnam was *** percent in interim 2022, compared with *** percent in interim 2021.

Table VII-22

Paper file folders: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in 1,000 folders; ratio in percent

Measure	Source	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Inventories quantity	China	***	***	***	***	***
Ratio to imports	China	***	***	***	***	***
Ratio to U.S. shipments of imports	China	***	***	***	***	***
Ratio to total shipments of imports	China	***	***	***	***	***
Inventories quantity	India	***	***	***	***	***
Ratio to imports	India	***	***	***	***	***
Ratio to U.S. shipments of imports	India	***	***	***	***	***
Ratio to total shipments of imports	India	***	***	***	***	***
Inventories quantity	Vietnam	***	***	***	***	***
Ratio to imports	Vietnam	***	***	***	***	***
Ratio to U.S. shipments of imports	Vietnam	***	***	***	***	***
Ratio to total shipments of imports	Vietnam	***	***	***	***	***
Inventories quantity	Subject	***	***	***	***	***
Ratio to imports	Subject	***	***	***	***	***
Ratio to U.S. shipments of imports	Subject	***	***	***	***	***
Ratio to total shipments of imports	Subject	***	***	***	***	***
Inventories quantity	Mexico	***	***	***	***	***
Ratio to imports	Mexico	***	***	***	***	***
Ratio to U.S. shipments of imports	Mexico	***	***	***	***	***
Ratio to total shipments of imports	Mexico	***	***	***	***	***
Inventories quantity	All other sources	***	***	***	***	***
Ratio to imports	All other sources	***	***	***	***	***
Ratio to U.S. shipments of imports	All other sources	***	***	***	***	***
Ratio to total shipments of imports	All other sources	***	***	***	***	***
Inventories quantity	Nonsubject	***	***	***	***	***
Ratio to imports	Nonsubject	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject	***	***	***	***	***
Ratio to total shipments of imports	Nonsubject	***	***	***	***	***
Inventories quantity	All sources	***	***	***	***	***
Ratio to imports	All sources	***	***	***	***	***
Ratio to U.S. shipments of imports	All sources	***	***	***	***	***
Ratio to total shipments of imports	All sources	***	***	***	***	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of paper file folders from China, India, Vietnam, or nonsubject sources after June 30, 2022. The majority of the arranged imports from July 2022 to June 2023 are from Vietnam. Table VII-23 presents U.S. importers' arranged imports after June 30, 2022.

Table VII-23
Paper file folders: U.S. importers' arranged imports, by source and period

Quantity in 1,000 folders

Source	Jul-Sep 2022	Oct-Dec 2022	Jan-Mar 2023	Apr-Jun 2023	Total
China	***	***	***	***	***
India	***	***	***	***	***
Vietnam	***	***	***	***	***
Subject sources	***	***	***	***	***
Mexico	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

Third-country trade actions

Based on available information, paper file folders from China, India, and Vietnam have not been subject to antidumping or countervailing duty investigations outside the United States.²⁴

Information on nonsubject countries

Table VII-24 presents the largest global export sources for Binders, Folders, and File Covers (which includes Paper file folders as well as out-of-scope products) during 2019-2021. Global exports of these products declined by 5.2 percent from 2019 to 2021 (increasing by 12.1 percent in 2021, after decreasing by 15.4 percent in 2020). Global exports reportedly were tempered by the pandemic, due to supply constraints and lower demand as businesses closed.²⁵

²⁴ World Trade Organization (“WTO”), “Anti-dumping,” https://www.wto.org/english/tratop_e/adp_e/adp_e.htm, retrieved August 9, 2022; and WTO, “Subsidies and Countervailing Measures,” https://www.wto.org/english/tratop_e/scm_e/scm_e.htm, retrieved August 9, 2022.

²⁵ Wood, Grace. “The Retail Market for Stationery Products,” IBISWorld, September 2021.

The combined share of subject countries (China, India, and Vietnam) ranged from 32.2 percent to 34.5 percent during 2019-2021. Over a third of the 2020 global decrease (from 2019) was accounted for by the combined decline in exports from the subject countries. However, China accounted for almost all of the export decrease while exports from India and Vietnam both increased.

China was the largest global exporter of these products in every year, during 2019-21. However, China's share experienced a decline—from 24.9 percent in 2019 to 21.1 percent in 2020 and 2021—of total global export value. Vietnam was the fourth largest global exporter of Binders, Folders, and File Covers in 2021 (third largest in 2020 and fifth largest in 2019). Vietnam's total value of global exports have increased from \$42.6 million in 2019 to \$61.9 million in 2021 (45.2 percent). India's exports represent a relatively small share of global exports, accounting for 1.2 percent in 2021, a small uptick from 1.1 percent in 2019 and 2020. India's exports decreased 16.9 percent in 2020 and increased 27.7 percent in 2021.

Chinese exports share fell as the share of Vietnam and Poland rose during 2019-21. China's exports decreased from a value that was 388.9 percent larger than the exports from Vietnam in 2019 to 215.0 percent in 2021, as Vietnam's exports grew to account for 9.8 percent of global exports. China's exports also decreased from 445.5 percent larger than the value of the exports from Poland in 2019 to 230.5 percent in 2021, as Poland's exports grew to account for 9.2 percent of global exports.

Table VII-24
Binders: Global exports, by reporting country and period

Value in 1,000 dollars, Shares in percent

Exporting country	Measure	2019	2020	2021
United States	Value	28,021	20,251	19,891
China	Value	165,722	124,433	133,025
India	Value	7,415	6,165	7,872
Vietnam	Value	42,618	63,642	61,871
Subject exporters	Value	215,754	194,239	202,769
Mexico	Value	91,914	68,829	78,354
Germany	Value	68,184	59,102	62,277
Poland	Value	37,201	41,671	57,703
Czech Republic	Value	43,531	35,249	41,681
France	Value	30,060	27,464	31,065
Malaysia	Value	25,326	17,760	16,441
Canada	Value	11,293	9,935	12,387
All other exporters	Value	114,033	88,059	108,064
All reporting exporters	Value	665,318	562,558	630,631
United States	Share	4.2	3.6	3.2
China	Share	24.9	22.1	21.1
India	Share	1.1	1.1	1.2
Vietnam	Share	6.4	11.3	9.8
Subject exporters	Share	32.4	34.5	32.2
Mexico	Share	13.8	12.2	12.4
Germany	Share	10.2	10.5	9.9
Poland	Share	5.6	7.4	9.2
Czech Republic	Share	6.5	6.3	6.6
France	Share	4.5	4.9	4.9
Malaysia	Share	3.8	3.2	2.6
Canada	Share	1.7	1.8	2.0
All other exporters	Share	17.1	15.7	17.1
All reporting exporters	Share	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 4820.30 as reported by various national statistical authorities in the Global Trade Atlas database, accessed October 27, 2022 and official global import statistics from Vietnam under HS subheading 4820.30 as reported by various national statistical authorities in the Global Trade Atlas database, accessed October 27, 2022.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data. HS subheading 4820.30 is a basket category that contains products that are outside the scope of these investigations.

Mexico was the second largest global exporter of these products in every year but experienced a decline in its global export share from 13.8 percent in 2019 to 12.4 percent in 2021. Table VII-25 presents Mexico's exports. Mexico's exports almost exclusively went to the United States.²⁶

Table VII-25
Binders: Exports from Mexico, by destination market and period

Value in 1,000 dollars; Shares in percent

Destination market	Measure	2019	2020	2021
United States	Value	89,379	68,180	78,205
Guatemala	Value	151	51	44
Panama	Value	2,047	376	40
El Salvador	Value	89	21	17
Cuba	Value	2	5	15
Costa Rica	Value	154	110	14
Honduras	Value	60	23	13
Jamaica	Value	---	---	5
Nicaragua	Value	31	7	---
All other destination markets	Value	---	57	---
All destination markets	Value	91,914	68,829	78,354
United States	Share	97.2	99.1	99.8
Guatemala	Share	0.2	0.1	0.1
Panama	Share	2.2	0.5	0.1
El Salvador	Share	0.1	0.0	0.0
Cuba	Share	0.0	0.0	0.0
Costa Rica	Share	0.2	0.2	0.0
Honduras	Share	0.1	0.0	0.0
Jamaica	Share	---	---	0.0
Nicaragua	Share	0.0	0.0	---
All other destination markets	Share	---	0.1	---
All destination markets	Share	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 4820.30 as reported by INEGI in the Global Trade Atlas database, accessed October 27, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top, all remaining top export destinations shown in descending order of 2021 data. HS subheading 4820.30 is a basket category that contains products that are outside the scope of these investigations.

²⁶ TOPS makes paper file folders in Mexico. Petitioner believes that the majority of U.S. imports from Mexico are TOPS products. Petitioner's postconference brief, p. 5. *** Petitioner's postconference brief, Exhibit 1, p. 2. *** Petitioner's postconference brief, Exhibit 1, p. 7.

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
87 FR 63526, October 19, 2022	<i>Paper File Folders From China, India, and Vietnam; Institution of Anti-Dumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2022-10-19/pdf/2022-22676.pdf
87 FR 67441, November 8, 2022	<i>Paper File Folders From the People's Republic of China, India, and the Socialist Republic of Vietnam: Initiation of Less-Than-Fair-Value Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2022-11-08/pdf/2022-24316.pdf
87 FR 67447, November 8, 2022	<i>Paper File Folders From India: Initiation of Countervailing Duty Investigation</i>	https://www.govinfo.gov/content/pkg/FR-2022-11-08/pdf/2022-24315.pdf

APPENDIX B

LIST OF STAFF CONFERENCE WITNESSES

CALENDAR OF PUBLIC PRELIMINARY CONFERENCE

Those listed below appeared in the United States International Trade Commission’s preliminary conference:

Subject: Paper File Folders from China, India, and Vietnam
Inv. Nos.: 701-TA-683 and 731-TA-1594-1596 (Preliminary)
Date and Time: November 2, 2022 - 9:30 a.m.

OPENING REMARKS:

In Support of Imposition (**J. Michael Taylor**, King & Spalding LLP)
In Opposition to Imposition (**Andrew Schroth** and
Dharmendra Choudhary, Grunfeld, Desiderio, Lebowitz, Silverman & Klestadt LLP)

**In Support of the Imposition of
Antidumping and Countervailing Duty Orders:**

King & Spalding LLP
Washington, DC
on behalf of

Coalition of Domestic Folder Manufacturers

- Matthew Roberts**, Chief Executive Officer, TOPS Products LLC
- David Garber**, Senior Vice President of Sales & Marketing, TOPS Products LLC
- Bill Baird**, Senior Vice President of Manufacturing and Distribution,
TOPS Products LLC
- Casey Avent**, President, The Smead Manufacturing Company, Inc.
- Bradley Beckman**, Chief Operating Officer and Executive Vice President,
The Smead Manufacturing Company, Inc.
- Travis Johnson**, Director of Manufacturing, The Smead Manufacturing Company
- Andrew Szamosszegi**, Principal, Capital Trade Inc
- Brian Westenbroek**, Project Manager, Capital Trade Inc

J. Michael Taylor)
Stephen P. Vaughn) – OF COUNSEL
Barbara Medrado)

**In Opposition to the Imposition of
Antidumping and Countervailing Duty Orders:**

Grunfeld, Desiderio, Lebowitz, Silverman & Klestadt LLP
Washington, DC
on behalf of

Staples Inc.
Navneet Education Limited (India)
Three Color Stone Stationery Vietnam Co., Ltd. (Vietnam)

Andrew Schroth)
) – OF COUNSEL
Dharmendra Choudhary)

REBUTTAL/CLOSING REMARKS:

In Support of Imposition (**Stephen P. Vaughn**, King & Spalding LLP)
In Opposition to Imposition (**Andrew Schroth** and
Dharmendra Choudhary, Grunfeld, Desiderio, Lebowitz, Silverman & Klestadt LLP)

APPENDIX C
SUMMARY DATA

Table C-1

Paper file folders: Summary data concerning the U.S. market, by item and period

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

Item	Reported data					Period changes			
	Calendar year		2021	Jan-Jun		Comparison years			Jan-Jun 2021-22
	2019	2020		2021	2022	2019-21	2019-20	2020-21	
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Producers' share (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Importers' share (fn1):									
China.....	***	***	***	***	***	▼***	▼***	▼***	▼***
India.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Vietnam.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Mexico.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All import sources.....	***	***	***	***	***	▼***	▼***	▼***	▲***
U.S. consumption value:									
Amount.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Producers' share (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Importers' share (fn1):									
China.....	***	***	***	***	***	▼***	▲***	▼***	▲***
India.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Vietnam.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Subject sources.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Mexico.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All import sources.....	***	***	***	***	***	▼***	▼***	▼***	▲***
U.S. importers' U.S. shipments of imports from:									
China:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▲***	▲***
India:									
Quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Vietnam:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources:									
Quantity.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Mexico:									
Quantity.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
All other 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.....	***	***	***	***	***	▲***	▼***	▲***	▲***

Table continued

Table C-1 Continued

Paper file folders: Summary data concerning the U.S. market, by item and period

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

Item	Reported data					Period changes			
	Calendar year		2021	Jan-Jun		Comparison years			Jan-Jun 2021-22
	2019	2020		2021	2022	2019-21	2019-20	2020-21	
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 (folders per hour).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit labor costs.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Net sales:									
Quantity.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Cost of goods sold (COGS).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▼***
SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
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.....	***	***	***	***	***	▲***	▲***	▲***	***

Source: Compiled from data submitted in response to Commission questionnaires. 508-compliant tables containing these data are contained in parts III, IV, VI, and VII of this report.

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

APPENDIX D

U.S. PRODUCERS' AND U.S. IMPORTERS' U.S. SHIPMENTS BY PRODUCT TYPE

Table D-1
Paper file folders: U.S. producers' U.S. shipments by product type and period

Quantity in 1,000 folders and 1,000 pounds, value in 1,000 dollars; unit values in dollars per 1,000 folders and dollars per 1,000 pounds

Product type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Manila folders	1,000 folders	***	***	***	***	***
Hanging folders	1,000 folders	***	***	***	***	***
Fastener folders	1,000 folders	***	***	***	***	***
Expanding folders	1,000 folders	***	***	***	***	***
Other folders	1,000 folders	***	***	***	***	***
All folders	1,000 folders	***	***	***	***	***
Manila folders	1,000 pounds	***	***	***	***	***
Hanging folders	1,000 pounds	***	***	***	***	***
Fastener folders	1,000 pounds	***	***	***	***	***
Expanding folders	1,000 pounds	***	***	***	***	***
Other folders	1,000 pounds	***	***	***	***	***
All folders	1,000 pounds	***	***	***	***	***
Manila folders	Value	***	***	***	***	***
Hanging folders	Value	***	***	***	***	***
Fastener folders	Value	***	***	***	***	***
Expanding folders	Value	***	***	***	***	***
Other folders	Value	***	***	***	***	***
All folders	Value	***	***	***	***	***
Manila folders	Dollars per 1,000 folders	***	***	***	***	***
Hanging folders	Dollars per 1,000 folders	***	***	***	***	***
Fastener folders	Dollars per 1,000 folders	***	***	***	***	***
Expanding folders	Dollars per 1,000 folders	***	***	***	***	***
Other folders	Dollars per 1,000 folders	***	***	***	***	***
All folders	Dollars per 1,000 folders	***	***	***	***	***
Manila folders	Dollars per 1,000 pounds	***	***	***	***	***
Hanging folders	Dollars per 1,000 pounds	***	***	***	***	***
Fastener folders	Dollars per 1,000 pounds	***	***	***	***	***
Expanding folders	Dollars per 1,000 pounds	***	***	***	***	***
Other folders	Dollars per 1,000 pounds	***	***	***	***	***
All folders	Dollars per 1,000 pounds	***	***	***	***	***

Table continued.

Table D-1
Paper file folders: U.S. producers' U.S. shipments by product type and period

Share in percent.

Product type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Manila folders	Share of 1,000 folders	***	***	***	***	***
Hanging folders	Share of 1,000 folders	***	***	***	***	***
Fastener folders	Share of 1,000 folders	***	***	***	***	***
Expanding folders	Share of 1,000 folders	***	***	***	***	***
Other folders	Share of 1,000 folders	***	***	***	***	***
All folders	Share of 1,000 folders	100.0	100.0	100.0	100.0	100.0
Manila folders	Share of 1,000 pounds	***	***	***	***	***
Hanging folders	Share of 1,000 pounds	***	***	***	***	***
Fastener folders	Share of 1,000 pounds	***	***	***	***	***
Expanding folders	Share of 1,000 pounds	***	***	***	***	***
Other folders	Share of 1,000 pounds	***	***	***	***	***
All folders	Share of 1,000 pounds	100.0	100.0	100.0	100.0	100.0
Manila folders	Share of value	***	***	***	***	***
Hanging folders	Share of value	***	***	***	***	***
Fastener folders	Share of value	***	***	***	***	***
Expanding folders	Share of value	***	***	***	***	***
Other folders	Share of value	***	***	***	***	***
All folders	Share of value	100.0	100.0	100.0	100.0	100.0

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

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

Table D-2
Paper file folders: U.S. importers' U.S. shipments of imports from China by product type and period

Quantity in 1,000 folders and 1,000 pounds, value in 1,000 dollars; unit values in dollars per 1,000 folders and dollars per 1,000 pounds

Product type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Manila folders	1,000 folders	***	***	***	***	***
Hanging folders	1,000 folders	***	***	***	***	***
Fastener folders	1,000 folders	***	***	***	***	***
Expanding folders	1,000 folders	***	***	***	***	***
Other folders	1,000 folders	***	***	***	***	***
All folders	1,000 folders	***	***	***	***	***
Manila folders	1,000 pounds	***	***	***	***	***
Hanging folders	1,000 pounds	***	***	***	***	***
Fastener folders	1,000 pounds	***	***	***	***	***
Expanding folders	1,000 pounds	***	***	***	***	***
Other folders	1,000 pounds	***	***	***	***	***
All folders	1,000 pounds	***	***	***	***	***
Manila folders	Value	***	***	***	***	***
Hanging folders	Value	***	***	***	***	***
Fastener folders	Value	***	***	***	***	***
Expanding folders	Value	***	***	***	***	***
Other folders	Value	***	***	***	***	***
All folders	Value	***	***	***	***	***
Manila folders	Dollars per 1,000 folders	***	***	***	***	***
Hanging folders	Dollars per 1,000 folders	***	***	***	***	***
Fastener folders	Dollars per 1,000 folders	***	***	***	***	***
Expanding folders	Dollars per 1,000 folders	***	***	***	***	***
Other folders	Dollars per 1,000 folders	***	***	***	***	***
All folders	Dollars per 1,000 folders	***	***	***	***	***
Manila folders	Dollars per 1,000 pounds	***	***	***	***	***
Hanging folders	Dollars per 1,000 pounds	***	***	***	***	***
Fastener folders	Dollars per 1,000 pounds	***	***	***	***	***
Expanding folders	Dollars per 1,000 pounds	***	***	***	***	***
Other folders	Dollars per 1,000 pounds	***	***	***	***	***
All folders	Dollars per 1,000 pounds	***	***	***	***	***

Table continued.

Table D-2 Continued
Paper file folders: U.S. importers' U.S. shipments of imports from China by product type and period

Share in percent

Product type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Manila folders	Share of 1,000 folders	***	***	***	***	***
Hanging folders	Share of 1,000 folders	***	***	***	***	***
Fastener folders	Share of 1,000 folders	***	***	***	***	***
Expanding folders	Share of 1,000 folders	***	***	***	***	***
Other folders	Share of 1,000 folders	***	***	***	***	***
All folders	Share of 1,000 folders	100.0	100.0	100.0	100.0	100.0
Manila folders	Share of 1,000 pounds	***	***	***	***	***
Hanging folders	Share of 1,000 pounds	***	***	***	***	***
Fastener folders	Share of 1,000 pounds	***	***	***	***	***
Expanding folders	Share of 1,000 pounds	***	***	***	***	***
Other folders	Share of 1,000 pounds	***	***	***	***	***
All folders	Share of 1,000 pounds	100.0	100.0	100.0	100.0	100.0
Manila folders	Share of value	***	***	***	***	***
Hanging folders	Share of value	***	***	***	***	***
Fastener folders	Share of value	***	***	***	***	***
Expanding folders	Share of value	***	***	***	***	***
Other folders	Share of value	***	***	***	***	***
All folders	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table D-3**Paper file folders: U.S. importers' U.S. shipments of imports from India by product type and period**

Quantity in 1,000 folders and 1,000 pounds, value in 1,000 dollars; unit values in dollars per 1,000 folders and dollars per 1,000 pounds

Product type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Manila folders	1,000 folders	***	***	***	***	***
Hanging folders	1,000 folders	***	***	***	***	***
Fastener folders	1,000 folders	***	***	***	***	***
Expanding folders	1,000 folders	***	***	***	***	***
Other folders	1,000 folders	***	***	***	***	***
All folders	1,000 folders	***	***	***	***	***
Manila folders	1,000 pounds	***	***	***	***	***
Hanging folders	1,000 pounds	***	***	***	***	***
Fastener folders	1,000 pounds	***	***	***	***	***
Expanding folders	1,000 pounds	***	***	***	***	***
Other folders	1,000 pounds	***	***	***	***	***
All folders	1,000 pounds	***	***	***	***	***
Manila folders	Value	***	***	***	***	***
Hanging folders	Value	***	***	***	***	***
Fastener folders	Value	***	***	***	***	***
Expanding folders	Value	***	***	***	***	***
Other folders	Value	***	***	***	***	***
All folders	Value	***	***	***	***	***
Manila folders	Dollars per 1,000 folders	***	***	***	***	***
Hanging folders	Dollars per 1,000 folders	***	***	***	***	***
Fastener folders	Dollars per 1,000 folders	***	***	***	***	***
Expanding folders	Dollars per 1,000 folders	***	***	***	***	***
Other folders	Dollars per 1,000 folders	***	***	***	***	***
All folders	Dollars per 1,000 folders	***	***	***	***	***
Manila folders	Dollars per 1,000 pounds	***	***	***	***	***
Hanging folders	Dollars per 1,000 pounds	***	***	***	***	***
Fastener folders	Dollars per 1,000 pounds	***	***	***	***	***
Expanding folders	Dollars per 1,000 pounds	***	***	***	***	***
Other folders	Dollars per 1,000 pounds	***	***	***	***	***
All folders	Dollars per 1,000 pounds	***	***	***	***	***

Table continued.

Table D-3 Continued

Paper file folders: U.S. importers' U.S. shipments of imports from India by product type and period

Share in percent

Product type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Manila folders	Share of 1,000 folders	***	***	***	***	***
Hanging folders	Share of 1,000 folders	***	***	***	***	***
Fastener folders	Share of 1,000 folders	***	***	***	***	***
Expanding folders	Share of 1,000 folders	***	***	***	***	***
Other folders	Share of 1,000 folders	***	***	***	***	***
All folders	Share of 1,000 folders	100.0	100.0	100.0	100.0	100.0
Manila folders	Share of 1,000 pounds	***	***	***	***	***
Hanging folders	Share of 1,000 pounds	***	***	***	***	***
Fastener folders	Share of 1,000 pounds	***	***	***	***	***
Expanding folders	Share of 1,000 pounds	***	***	***	***	***
Other folders	Share of 1,000 pounds	***	***	***	***	***
All folders	Share of 1,000 pounds	100.0	100.0	100.0	100.0	100.0
Manila folders	Share of value	***	***	***	***	***
Hanging folders	Share of value	***	***	***	***	***
Fastener folders	Share of value	***	***	***	***	***
Expanding folders	Share of value	***	***	***	***	***
Other folders	Share of value	***	***	***	***	***
All folders	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table D-4
Paper file folders: U.S. importers' U.S. shipments of imports from Vietnam by product type and period

Quantity in 1,000 folders and 1,000 pounds, value in 1,000 dollars; unit values in dollars per 1,000 folders and dollars per 1,000 pounds

Product type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Manila folders	1,000 folders	***	***	***	***	***
Hanging folders	1,000 folders	***	***	***	***	***
Fastener folders	1,000 folders	***	***	***	***	***
Expanding folders	1,000 folders	***	***	***	***	***
Other folders	1,000 folders	***	***	***	***	***
All folders	1,000 folders	***	***	***	***	***
Manila folders	1,000 pounds	***	***	***	***	***
Hanging folders	1,000 pounds	***	***	***	***	***
Fastener folders	1,000 pounds	***	***	***	***	***
Expanding folders	1,000 pounds	***	***	***	***	***
Other folders	1,000 pounds	***	***	***	***	***
All folders	1,000 pounds	***	***	***	***	***
Manila folders	Value	***	***	***	***	***
Hanging folders	Value	***	***	***	***	***
Fastener folders	Value	***	***	***	***	***
Expanding folders	Value	***	***	***	***	***
Other folders	Value	***	***	***	***	***
All folders	Value	***	***	***	***	***
Manila folders	Dollars per 1,000 folders	***	***	***	***	***
Hanging folders	Dollars per 1,000 folders	***	***	***	***	***
Fastener folders	Dollars per 1,000 folders	***	***	***	***	***
Expanding folders	Dollars per 1,000 folders	***	***	***	***	***
Other folders	Dollars per 1,000 folders	***	***	***	***	***
All folders	Dollars per 1,000 folders	***	***	***	***	***
Manila folders	Dollars per 1,000 pounds	***	***	***	***	***
Hanging folders	Dollars per 1,000 pounds	***	***	***	***	***
Fastener folders	Dollars per 1,000 pounds	***	***	***	***	***
Expanding folders	Dollars per 1,000 pounds	***	***	***	***	***
Other folders	Dollars per 1,000 pounds	***	***	***	***	***
All folders	Dollars per 1,000 pounds	***	***	***	***	***

Table continued.

Table D-4 Continued
Paper file folders: U.S. importers' U.S. shipments of imports from Vietnam by product type and period

Share in percent

Product type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Manila folders	Share of 1,000 folders	***	***	***	***	***
Hanging folders	Share of 1,000 folders	***	***	***	***	***
Fastener folders	Share of 1,000 folders	***	***	***	***	***
Expanding folders	Share of 1,000 folders	***	***	***	***	***
Other folders	Share of 1,000 folders	***	***	***	***	***
All folders	Share of 1,000 folders	100.0	100.0	100.0	100.0	100.0
Manila folders	Share of 1,000 pounds	***	***	***	***	***
Hanging folders	Share of 1,000 pounds	***	***	***	***	***
Fastener folders	Share of 1,000 pounds	***	***	***	***	***
Expanding folders	Share of 1,000 pounds	***	***	***	***	***
Other folders	Share of 1,000 pounds	***	***	***	***	***
All folders	Share of 1,000 pounds	100.0	100.0	100.0	100.0	100.0
Manila folders	Share of value	***	***	***	***	***
Hanging folders	Share of value	***	***	***	***	***
Fastener folders	Share of value	***	***	***	***	***
Expanding folders	Share of value	***	***	***	***	***
Other folders	Share of value	***	***	***	***	***
All folders	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table D-5
Paper file folders: U.S. importers' U.S. shipments of subject imports by product type and period

Quantity in 1,000 folders and 1,000 pounds, value in 1,000 dollars; unit values in dollars per 1,000 folders and dollars per 1,000 pounds

Product type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Manila folders	1,000 folders	***	***	***	***	***
Hanging folders	1,000 folders	***	***	***	***	***
Fastener folders	1,000 folders	***	***	***	***	***
Expanding folders	1,000 folders	***	***	***	***	***
Other folders	1,000 folders	***	***	***	***	***
All folders	1,000 folders	***	***	***	***	***
Manila folders	1,000 pounds	***	***	***	***	***
Hanging folders	1,000 pounds	***	***	***	***	***
Fastener folders	1,000 pounds	***	***	***	***	***
Expanding folders	1,000 pounds	***	***	***	***	***
Other folders	1,000 pounds	***	***	***	***	***
All folders	1,000 pounds	***	***	***	***	***
Manila folders	Value	***	***	***	***	***
Hanging folders	Value	***	***	***	***	***
Fastener folders	Value	***	***	***	***	***
Expanding folders	Value	***	***	***	***	***
Other folders	Value	***	***	***	***	***
All folders	Value	***	***	***	***	***
Manila folders	Dollars per 1,000 folders	***	***	***	***	***
Hanging folders	Dollars per 1,000 folders	***	***	***	***	***
Fastener folders	Dollars per 1,000 folders	***	***	***	***	***
Expanding folders	Dollars per 1,000 folders	***	***	***	***	***
Other folders	Dollars per 1,000 folders	***	***	***	***	***
All folders	Dollars per 1,000 folders	***	***	***	***	***
Manila folders	Dollars per 1,000 pounds	***	***	***	***	***
Hanging folders	Dollars per 1,000 pounds	***	***	***	***	***
Fastener folders	Dollars per 1,000 pounds	***	***	***	***	***
Expanding folders	Dollars per 1,000 pounds	***	***	***	***	***
Other folders	Dollars per 1,000 pounds	***	***	***	***	***
All folders	Dollars per 1,000 pounds	***	***	***	***	***

Table continued.

Table D-5 Continued**Paper file folders: U.S. importers' U.S. shipments of subject imports by product type and period**

Share in percent

Product type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Manila folders	Share of 1,000 folders	***	***	***	***	***
Hanging folders	Share of 1,000 folders	***	***	***	***	***
Fastener folders	Share of 1,000 folders	***	***	***	***	***
Expanding folders	Share of 1,000 folders	***	***	***	***	***
Other folders	Share of 1,000 folders	***	***	***	***	***
All folders	Share of 1,000 folders	100.0	100.0	100.0	100.0	100.0
Manila folders	Share of 1,000 pounds	***	***	***	***	***
Hanging folders	Share of 1,000 pounds	***	***	***	***	***
Fastener folders	Share of 1,000 pounds	***	***	***	***	***
Expanding folders	Share of 1,000 pounds	***	***	***	***	***
Other folders	Share of 1,000 pounds	***	***	***	***	***
All folders	Share of 1,000 pounds	100.0	100.0	100.0	100.0	100.0
Manila folders	Share of value	***	***	***	***	***
Hanging folders	Share of value	***	***	***	***	***
Fastener folders	Share of value	***	***	***	***	***
Expanding folders	Share of value	***	***	***	***	***
Other folders	Share of value	***	***	***	***	***
All folders	Share of value	100.0	100.0	100.0	100.0	100.0

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

Table D-6
Paper file folders: U.S. importers' U.S. shipments of imports from Mexico by product type and period

Quantity in 1,000 folders and 1,000 pounds, value in 1,000 dollars; unit values in dollars per 1,000 folders and dollars per 1,000 pounds

Product type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Manila folders	1,000 folders	***	***	***	***	***
Hanging folders	1,000 folders	***	***	***	***	***
Fastener folders	1,000 folders	***	***	***	***	***
Expanding folders	1,000 folders	***	***	***	***	***
Other folders	1,000 folders	***	***	***	***	***
All folders	1,000 folders	***	***	***	***	***
Manila folders	1,000 pounds	***	***	***	***	***
Hanging folders	1,000 pounds	***	***	***	***	***
Fastener folders	1,000 pounds	***	***	***	***	***
Expanding folders	1,000 pounds	***	***	***	***	***
Other folders	1,000 pounds	***	***	***	***	***
All folders	1,000 pounds	***	***	***	***	***
Manila folders	Value	***	***	***	***	***
Hanging folders	Value	***	***	***	***	***
Fastener folders	Value	***	***	***	***	***
Expanding folders	Value	***	***	***	***	***
Other folders	Value	***	***	***	***	***
All folders	Value	***	***	***	***	***
Manila folders	Dollars per 1,000 folders	***	***	***	***	***
Hanging folders	Dollars per 1,000 folders	***	***	***	***	***
Fastener folders	Dollars per 1,000 folders	***	***	***	***	***
Expanding folders	Dollars per 1,000 folders	***	***	***	***	***
Other folders	Dollars per 1,000 folders	***	***	***	***	***
All folders	Dollars per 1,000 folders	***	***	***	***	***
Manila folders	Dollars per 1,000 pounds	***	***	***	***	***
Hanging folders	Dollars per 1,000 pounds	***	***	***	***	***
Fastener folders	Dollars per 1,000 pounds	***	***	***	***	***
Expanding folders	Dollars per 1,000 pounds	***	***	***	***	***
Other folders	Dollars per 1,000 pounds	***	***	***	***	***
All folders	Dollars per 1,000 pounds	***	***	***	***	***

Table continued.

Table D-6 Continued
Paper file folders: U.S. importers' U.S. shipments of imports from Mexico by product type and period

Share in percent

Product type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Manila folders	Share of 1,000 folders	***	***	***	***	***
Hanging folders	Share of 1,000 folders	***	***	***	***	***
Fastener folders	Share of 1,000 folders	***	***	***	***	***
Expanding folders	Share of 1,000 folders	***	***	***	***	***
Other folders	Share of 1,000 folders	***	***	***	***	***
All folders	Share of 1,000 folders	100.0	100.0	100.0	100.0	100.0
Manila folders	Share of 1,000 pounds	***	***	***	***	***
Hanging folders	Share of 1,000 pounds	***	***	***	***	***
Fastener folders	Share of 1,000 pounds	***	***	***	***	***
Expanding folders	Share of 1,000 pounds	***	***	***	***	***
Other folders	Share of 1,000 pounds	***	***	***	***	***
All folders	Share of 1,000 pounds	100.0	100.0	100.0	100.0	100.0
Manila folders	Share of value	***	***	***	***	***
Hanging folders	Share of value	***	***	***	***	***
Fastener folders	Share of value	***	***	***	***	***
Expanding folders	Share of value	***	***	***	***	***
Other folders	Share of value	***	***	***	***	***
All folders	Share of value	100.0	100.0	100.0	100.0	100.0

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

Table D-7**Paper file folders: U.S. importers' U.S. shipments of imports from all other sources by product type and period**

Quantity in 1,000 folders and 1,000 pounds, value in 1,000 dollars; unit values in dollars per 1,000 folders and dollars per 1,000 pounds

Product type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Manila folders	1,000 folders	***	***	***	***	***
Hanging folders	1,000 folders	***	***	***	***	***
Fastener folders	1,000 folders	***	***	***	***	***
Expanding folders	1,000 folders	***	***	***	***	***
Other folders	1,000 folders	***	***	***	***	***
All folders	1,000 folders	***	***	***	***	***
Manila folders	1,000 pounds	***	***	***	***	***
Hanging folders	1,000 pounds	***	***	***	***	***
Fastener folders	1,000 pounds	***	***	***	***	***
Expanding folders	1,000 pounds	***	***	***	***	***
Other folders	1,000 pounds	***	***	***	***	***
All folders	1,000 pounds	***	***	***	***	***
Manila folders	Value	***	***	***	***	***
Hanging folders	Value	***	***	***	***	***
Fastener folders	Value	***	***	***	***	***
Expanding folders	Value	***	***	***	***	***
Other folders	Value	***	***	***	***	***
All folders	Value	***	***	***	***	***
Manila folders	Dollars per 1,000 folders	***	***	***	***	***
Hanging folders	Dollars per 1,000 folders	***	***	***	***	***
Fastener folders	Dollars per 1,000 folders	***	***	***	***	***
Expanding folders	Dollars per 1,000 folders	***	***	***	***	***
Other folders	Dollars per 1,000 folders	***	***	***	***	***
All folders	Dollars per 1,000 folders	***	***	***	***	***
Manila folders	Dollars per 1,000 pounds	***	***	***	***	***
Hanging folders	Dollars per 1,000 pounds	***	***	***	***	***
Fastener folders	Dollars per 1,000 pounds	***	***	***	***	***
Expanding folders	Dollars per 1,000 pounds	***	***	***	***	***
Other folders	Dollars per 1,000 pounds	***	***	***	***	***
All folders	Dollars per 1,000 pounds	***	***	***	***	***

Table continued.

Table D-7 Continued
Paper file folders: U.S. importers' U.S. shipments of imports from all other sources by product type and period

Share in percent

Product type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Manila folders	Share of 1,000 folders	***	***	***	***	***
Hanging folders	Share of 1,000 folders	***	***	***	***	***
Fastener folders	Share of 1,000 folders	***	***	***	***	***
Expanding folders	Share of 1,000 folders	***	***	***	***	***
Other folders	Share of 1,000 folders	***	***	***	***	***
All folders	Share of 1,000 folders	***	***	***	***	100.0
Manila folders	Share of 1,000 pounds	***	***	***	***	***
Hanging folders	Share of 1,000 pounds	***	***	***	***	***
Fastener folders	Share of 1,000 pounds	***	***	***	***	***
Expanding folders	Share of 1,000 pounds	***	***	***	***	***
Other folders	Share of 1,000 pounds	***	***	***	***	***
All folders	Share of 1,000 pounds	***	***	***	***	100.0
Manila folders	Share of value	***	***	***	***	***
Hanging folders	Share of value	***	***	***	***	***
Fastener folders	Share of value	***	***	***	***	***
Expanding folders	Share of value	***	***	***	***	***
Other folders	Share of value	***	***	***	***	***
All folders	Share of value	***	***	***	***	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table D-8
Paper file folders: U.S. importers' U.S. shipments of nonsubject imports by product type and period

Quantity in 1,000 folders and 1,000 pounds, value in 1,000 dollars; unit values in dollars per 1,000 folders and dollars per 1,000 pounds

Product type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Manila folders	1,000 folders	***	***	***	***	***
Hanging folders	1,000 folders	***	***	***	***	***
Fastener folders	1,000 folders	***	***	***	***	***
Expanding folders	1,000 folders	***	***	***	***	***
Other folders	1,000 folders	***	***	***	***	***
All folders	1,000 folders	***	***	***	***	***
Manila folders	1,000 pounds	***	***	***	***	***
Hanging folders	1,000 pounds	***	***	***	***	***
Fastener folders	1,000 pounds	***	***	***	***	***
Expanding folders	1,000 pounds	***	***	***	***	***
Other folders	1,000 pounds	***	***	***	***	***
All folders	1,000 pounds	***	***	***	***	***
Manila folders	Value	***	***	***	***	***
Hanging folders	Value	***	***	***	***	***
Fastener folders	Value	***	***	***	***	***
Expanding folders	Value	***	***	***	***	***
Other folders	Value	***	***	***	***	***
All folders	Value	***	***	***	***	***
Manila folders	Dollars per 1,000 folders	***	***	***	***	***
Hanging folders	Dollars per 1,000 folders	***	***	***	***	***
Fastener folders	Dollars per 1,000 folders	***	***	***	***	***
Expanding folders	Dollars per 1,000 folders	***	***	***	***	***
Other folders	Dollars per 1,000 folders	***	***	***	***	***
All folders	Dollars per 1,000 folders	***	***	***	***	***
Manila folders	Dollars per 1,000 pounds	***	***	***	***	***
Hanging folders	Dollars per 1,000 pounds	***	***	***	***	***
Fastener folders	Dollars per 1,000 pounds	***	***	***	***	***
Expanding folders	Dollars per 1,000 pounds	***	***	***	***	***
Other folders	Dollars per 1,000 pounds	***	***	***	***	***
All folders	Dollars per 1,000 pounds	***	***	***	***	***

Table continued.

Table D-8 Continued
Paper file folders: U.S. importers' U.S. shipments of nonsubject imports by product type and period

Share in percent

Product type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Manila folders	Share of 1,000 folders	***	***	***	***	***
Hanging folders	Share of 1,000 folders	***	***	***	***	***
Fastener folders	Share of 1,000 folders	***	***	***	***	***
Expanding folders	Share of 1,000 folders	***	***	***	***	***
Other folders	Share of 1,000 folders	***	***	***	***	***
All folders	Share of 1,000 folders	100.0	100.0	100.0	100.0	100.0
Manila folders	Share of 1,000 pounds	***	***	***	***	***
Hanging folders	Share of 1,000 pounds	***	***	***	***	***
Fastener folders	Share of 1,000 pounds	***	***	***	***	***
Expanding folders	Share of 1,000 pounds	***	***	***	***	***
Other folders	Share of 1,000 pounds	***	***	***	***	***
All folders	Share of 1,000 pounds	100.0	100.0	100.0	100.0	100.0
Manila folders	Share of value	***	***	***	***	***
Hanging folders	Share of value	***	***	***	***	***
Fastener folders	Share of value	***	***	***	***	***
Expanding folders	Share of value	***	***	***	***	***
Other folders	Share of value	***	***	***	***	***
All folders	Share of value	100.0	100.0	100.0	100.0	100.0

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

Table D-9
Paper file folders: U.S. importers' U.S. shipments of imports from all sources by product type and period

Quantity in 1,000 folders and 1,000 pounds, value in 1,000 dollars; unit values in dollars per 1,000 folders and dollars per 1,000 pounds

Product type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Manila folders	1,000 folders	***	***	***	***	***
Hanging folders	1,000 folders	***	***	***	***	***
Fastener folders	1,000 folders	***	***	***	***	***
Expanding folders	1,000 folders	***	***	***	***	***
Other folders	1,000 folders	***	***	***	***	***
All folders	1,000 folders	***	***	***	***	***
Manila folders	1,000 pounds	***	***	***	***	***
Hanging folders	1,000 pounds	***	***	***	***	***
Fastener folders	1,000 pounds	***	***	***	***	***
Expanding folders	1,000 pounds	***	***	***	***	***
Other folders	1,000 pounds	***	***	***	***	***
All folders	1,000 pounds	***	***	***	***	***
Manila folders	Value	***	***	***	***	***
Hanging folders	Value	***	***	***	***	***
Fastener folders	Value	***	***	***	***	***
Expanding folders	Value	***	***	***	***	***
Other folders	Value	***	***	***	***	***
All folders	Value	***	***	***	***	***
Manila folders	Dollars per 1,000 folders	***	***	***	***	***
Hanging folders	Dollars per 1,000 folders	***	***	***	***	***
Fastener folders	Dollars per 1,000 folders	***	***	***	***	***
Expanding folders	Dollars per 1,000 folders	***	***	***	***	***
Other folders	Dollars per 1,000 folders	***	***	***	***	***
All folders	Dollars per 1,000 folders	***	***	***	***	***
Manila folders	Dollars per 1,000 pounds	***	***	***	***	***
Hanging folders	Dollars per 1,000 pounds	***	***	***	***	***
Fastener folders	Dollars per 1,000 pounds	***	***	***	***	***
Expanding folders	Dollars per 1,000 pounds	***	***	***	***	***
Other folders	Dollars per 1,000 pounds	***	***	***	***	***
All folders	Dollars per 1,000 pounds	***	***	***	***	***

Table continued.

Table D-9 Continued

Paper file folders: U.S. importers' U.S. shipments of imports from all sources by product type and period

Share in percent

Product type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Manila folders	Share of 1,000 folders	***	***	***	***	***
Hanging folders	Share of 1,000 folders	***	***	***	***	***
Fastener folders	Share of 1,000 folders	***	***	***	***	***
Expanding folders	Share of 1,000 folders	***	***	***	***	***
Other folders	Share of 1,000 folders	***	***	***	***	***
All folders	Share of 1,000 folders	100.0	100.0	100.0	100.0	100.0
Manila folders	Share of 1,000 pounds	***	***	***	***	***
Hanging folders	Share of 1,000 pounds	***	***	***	***	***
Fastener folders	Share of 1,000 pounds	***	***	***	***	***
Expanding folders	Share of 1,000 pounds	***	***	***	***	***
Other folders	Share of 1,000 pounds	***	***	***	***	***
All folders	Share of 1,000 pounds	100.0	100.0	100.0	100.0	100.0
Manila folders	Share of value	***	***	***	***	***
Hanging folders	Share of value	***	***	***	***	***
Fastener folders	Share of value	***	***	***	***	***
Expanding folders	Share of value	***	***	***	***	***
Other folders	Share of value	***	***	***	***	***
All folders	Share of value	100.0	100.0	100.0	100.0	100.0

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

Table D-10
Paper file folders: U.S. producers' and U.S. importers' U.S. shipments of imports from all sources
by product type and period

Quantity in 1,000 folders and 1,000 pounds, value in 1,000 dollars; unit values in dollars per 1,000 folders and dollars per 1,000 pounds

Product type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Manila folders	1,000 folders	***	***	***	***	***
Hanging folders	1,000 folders	***	***	***	***	***
Fastener folders	1,000 folders	***	***	***	***	***
Expanding folders	1,000 folders	***	***	***	***	***
Other folders	1,000 folders	***	***	***	***	***
All folders	1,000 folders	***	***	***	***	***
Manila folders	1,000 pounds	***	***	***	***	***
Hanging folders	1,000 pounds	***	***	***	***	***
Fastener folders	1,000 pounds	***	***	***	***	***
Expanding folders	1,000 pounds	***	***	***	***	***
Other folders	1,000 pounds	***	***	***	***	***
All folders	1,000 pounds	***	***	***	***	***
Manila folders	Value	***	***	***	***	***
Hanging folders	Value	***	***	***	***	***
Fastener folders	Value	***	***	***	***	***
Expanding folders	Value	***	***	***	***	***
Other folders	Value	***	***	***	***	***
All folders	Value	***	***	***	***	***
Manila folders	Dollars per 1,000 folders	***	***	***	***	***
Hanging folders	Dollars per 1,000 folders	***	***	***	***	***
Fastener folders	Dollars per 1,000 folders	***	***	***	***	***
Expanding folders	Dollars per 1,000 folders	***	***	***	***	***
Other folders	Dollars per 1,000 folders	***	***	***	***	***
All folders	Dollars per 1,000 folders	***	***	***	***	***
Manila folders	Dollars per 1,000 pounds	***	***	***	***	***
Hanging folders	Dollars per 1,000 pounds	***	***	***	***	***
Fastener folders	Dollars per 1,000 pounds	***	***	***	***	***
Expanding folders	Dollars per 1,000 pounds	***	***	***	***	***
Other folders	Dollars per 1,000 pounds	***	***	***	***	***
All folders	Dollars per 1,000 pounds	***	***	***	***	***

Table continued.

Table D-10 Continued
Paper file folders: U.S. producers' and U.S. importers' U.S. shipments of imports from all sources
by product type and period

Share in percent

Product type	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Manila folders	Share of 1,000 folders	***	***	***	***	***
Hanging folders	Share of 1,000 folders	***	***	***	***	***
Fastener folders	Share of 1,000 folders	***	***	***	***	***
Expanding folders	Share of 1,000 folders	***	***	***	***	***
Other folders	Share of 1,000 folders	***	***	***	***	***
All folders	Share of 1,000 folders	100.0	100.0	100.0	100.0	100.0
Manila folders	Share of 1,000 pounds	***	***	***	***	***
Hanging folders	Share of 1,000 pounds	***	***	***	***	***
Fastener folders	Share of 1,000 pounds	***	***	***	***	***
Expanding folders	Share of 1,000 pounds	***	***	***	***	***
Other folders	Share of 1,000 pounds	***	***	***	***	***
All folders	Share of 1,000 pounds	100.0	100.0	100.0	100.0	100.0
Manila folders	Share of value	***	***	***	***	***
Hanging folders	Share of value	***	***	***	***	***
Fastener folders	Share of value	***	***	***	***	***
Expanding folders	Share of value	***	***	***	***	***
Other folders	Share of value	***	***	***	***	***
All folders	Share of value	100.0	100.0	100.0	100.0	100.0

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

APPENDIX E

ADDITIONAL U.S. IMPORT AND APPARENT U.S. CONSUMPTION DATA

Table E-1
Paper File Folders: U.S. imports on a weight basis, by source and period

Quantity in 1,000 pounds, unit value in dollars per 1,000 pounds, share in percent

Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
China	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Mexico	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
China	Unit value	***	***	***	***	***
India	Unit value	***	***	***	***	***
Vietnam	Unit value	***	***	***	***	***
Subject sources	Unit value	***	***	***	***	***
Mexico	Unit value	***	***	***	***	***
All other sources	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	***	***	***	***	***
China	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Mexico	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

Figure E-1
Paper file folders: U.S. imports on a weight basis, by source and period

* * * * *

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

Table E-2
Paper file folders: Apparent U.S. consumption and market share on a weight basis, by source and period

Quantity in 1,000 pounds, share in percent.

Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Mexico	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Mexico	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

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

Figure E-2
Paper file folders: Apparent U.S. consumption on a weight basis, by source and period

* * * * *

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

Table E-3
Paper file folders: Official U.S. imports statistics on a weight basis, by source and period

Quantity in 1,000 pounds, value in 1,000 dollars, unit value in dollars per 1,000 pounds

Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
China	Quantity	30,981	18,532	10,952	6,481	8,866
India	Quantity	5,284	4,609	6,959	3,685	4,747
Vietnam	Quantity	1,810	9,173	13,970	6,726	17,496
Subject sources	Quantity	38,075	32,314	31,882	16,892	31,109
Mexico	Quantity	45,487	29,896	32,325	13,587	15,562
All other sources	Quantity	2,884	1,791	1,639	777	1,176
Nonsubject sources	Quantity	48,372	31,687	33,964	14,364	16,738
All import sources	Quantity	86,446	64,001	65,846	31,256	47,847
China	Value	56,803	29,344	21,168	12,056	17,666
India	Value	5,991	5,102	7,908	4,040	5,711
Vietnam	Value	3,265	19,546	24,291	12,392	25,469
Subject sources	Value	66,059	53,992	53,367	28,488	48,846
Mexico	Value	60,285	38,454	39,333	16,718	21,709
All other sources	Value	11,364	9,257	11,042	5,153	7,274
Nonsubject sources	Value	71,649	47,711	50,375	21,871	28,983
All import sources	Value	137,708	101,704	103,742	50,359	77,829
China	Unit value	1,833	1,583	1,933	1,860	1,993
India	Unit value	1,134	1,107	1,136	1,096	1,203
Vietnam	Unit value	1,804	2,131	1,739	1,842	1,456
Subject sources	Unit value	1,735	1,671	1,674	1,687	1,570
Mexico	Unit value	1,325	1,286	1,217	1,230	1,395
All other sources	Unit value	3,940	5,169	6,737	6,630	6,188
Nonsubject sources	Unit value	1,481	1,506	1,483	1,523	1,732
All import sources	Unit value	1,593	1,589	1,576	1,611	1,627

Table continued.

Table E-3 Continued**Paper file folders: Official U.S. imports statistics on a weight basis, by source and period**

Share in percent

Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
China	Share of quantity	35.8	29.0	16.6	20.7	18.5
India	Share of quantity	6.1	7.2	10.6	11.8	9.9
Vietnam	Share of quantity	2.1	14.3	21.2	21.5	36.6
Subject sources	Share of quantity	44.0	50.5	48.4	54.0	65.0
Mexico	Share of quantity	52.6	46.7	49.1	43.5	32.5
All other sources	Share of quantity	3.3	2.8	2.5	2.5	2.5
Nonsubject sources	Share of quantity	56.0	49.5	51.6	46.0	35.0
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
China	Share of value	41.2	28.9	20.4	23.9	22.7
India	Share of value	4.4	5.0	7.6	8.0	7.3
Vietnam	Share of value	2.4	19.2	23.4	24.6	32.7
Subject sources	Share of value	48.0	53.1	51.4	56.6	62.8
Mexico	Share of value	43.8	37.8	37.9	33.2	27.9
All other sources	Share of value	8.3	9.1	10.6	10.2	9.3
Nonsubject sources	Share of value	52.0	46.9	48.6	43.4	37.2
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 4820.30.0040, accessed October 21, 2022. Imports are based on the imports for consumption data series.

