

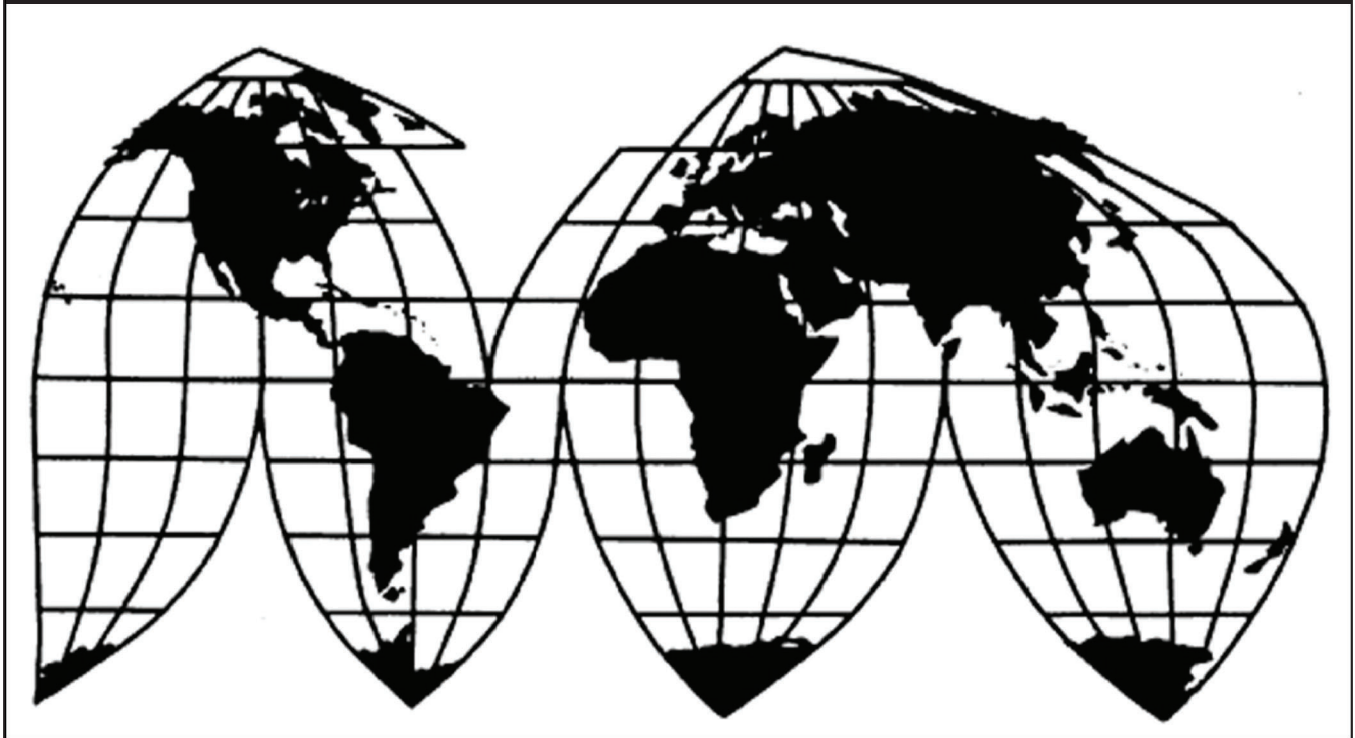
Circular Welded Carbon-Quality Steel Pipe from Oman, Pakistan, and the United Arab Emirates

Investigation Nos. 731-TA-1299, 1300, and 1302 (Review)

Publication 5390

December 2022

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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Andrew Knipe, Economist

Zahra Bekkal, Accountant

Onslow Hall, Statistician

Henry Smith, Attorney

Nathanael Comly, Supervisory Investigator

Address all communications to
Secretary to the Commission
United States International Trade Commission
Washington, DC 20436

U.S. International Trade Commission

Washington, DC 20436
www.usitc.gov

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CONTENTS

	Page
Determinations	1
Views of the Commission	3
Part I: Introduction	I-1
Background	I-1
The original investigations	I-2
Previous and related investigations.....	I-3
Safeguard investigations.....	I-7
Summary data	I-8
Statutory criteria	I-13
Organization of report.....	I-15
Commerce’s reviews	I-16
Administrative reviews	I-16
Five-year reviews	I-19
The subject merchandise.....	I-20
Commerce’s scope.....	I-20
Tariff treatment	I-23
The product	I-24
Description and uses.....	I-24
Manufacturing process	I-25
Domestic like product issues	I-27
U.S. market participants	I-27
U.S. producers	I-27
U.S. importers.....	I-30
U.S. purchasers	I-32
Apparent U.S. consumption and market shares	I-32
Quantity.....	I-32
Value.....	I-35

CONTENTS

	Page
Part II: Conditions of competition in the U.S. market.....	II-1
U.S. market characteristics.....	II-1
Impact of section 232 tariffs	II-1
Channels of distribution	II-2
Geographic distribution	II-3
Supply and demand considerations	II-3
U.S. supply	II-3
U.S. demand	II-7
Substitutability issues.....	II-13
Factors affecting purchasing decisions.....	II-14
Purchase factor comparisons of domestic products, subject imports, and nonsubject imports	II-20
Comparison of U.S.-produced and imported CWP	II-25
Elasticity estimates.....	II-29
U.S. supply elasticity.....	II-29
U.S. demand elasticity	II-30
Substitution elasticity	II-30
Part III: Condition of the U.S. industry.....	III-1
Overview	III-1
Changes experienced by the industry	III-5
Anticipated changes in operations.....	III-6
U.S. production, capacity, and capacity utilization	III-8
Alternative products.....	III-12
Constraints on capacity	III-14
U.S. producers' U.S. shipments and exports.....	III-15
U.S. producers' inventories.....	III-16
U.S. producers' imports from subject sources.....	III-17
U.S. employment, wages, and productivity	III-17

CONTENTS

	Page
Financial experience of U.S. producers.....	III-19
Background.....	III-19
Operations on CWP.....	III-20
Net sales.....	III-40
Cost of goods sold and gross profit or loss.....	III-41
SG&A expenses and operating income or loss.....	III-44
All other expenses and net income or loss.....	III-45
Capital expenditures and research and development expenses.....	III-46
Assets and return on assets.....	III-47
Part IV: U.S. imports and the foreign industries.....	IV-1
U.S. imports.....	IV-1
Overview.....	IV-1
Imports from subject and nonsubject countries.....	IV-2
Cumulation considerations.....	IV-6
Fungibility.....	IV-7
Geographical markets.....	IV-17
Presence in the market.....	IV-18
U.S. inventories of imported merchandise.....	IV-23
U.S. importers' imports subsequent to June 2022.....	IV-26
The industry in Oman.....	IV-26
Overview.....	IV-26
Changes in operations.....	IV-27
Operations on CWP.....	IV-27
Alternative products.....	IV-34
Exports.....	IV-37
The industry in Pakistan.....	IV-39
Overview.....	IV-39
Exports.....	IV-39

CONTENTS

	Page
The industry in the UAE.....	IV-42
Overview.....	IV-42
Changes in operations.....	IV-42
Operations on CWP.....	IV-44
Alternative products.....	IV-50
Exports.....	IV-53
Subject countries combined.....	IV-55
Third-country trade actions.....	IV-61
Global market.....	IV-62
Prices.....	IV-65
Part V: Pricing data.....	V-1
Factors affecting prices.....	V-1
Raw material costs.....	V-1
Transportation costs to the U.S. market.....	V-3
U.S. inland transportation costs.....	V-4
Pricing practices.....	V-4
Pricing methods.....	V-4
Sales terms and discounts.....	V-5
Price leadership.....	V-6
Price data.....	V-6
Price trends.....	V-16
Price comparisons.....	V-18

CONTENTS

Page

Appendixes

A. Federal Register notices	A-1
B. Federal Register notice: Cancelled hearing.....	B-1
C. Summary data	C-1
D. Firm narratives on impact of orders.....	D-1
E. Data accompanying demand figures in part II	E-1
F. U.S. and foreign producers' shipments by attribute	F-1
G. Data accompanying raw material and price trend figures in part V.....	G-1
H. Price data by grade.....	H-1

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. 731-TA-1299, 1300, and 1302 (Review)

Circular welded carbon-quality steel pipe from Oman, Pakistan, and the United Arab Emirates

DETERMINATIONS

On the basis of the record¹ developed in the subject five-year reviews, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that revocation of the antidumping duty orders on circular welded carbon-quality steel pipe from Oman, Pakistan, and the United Arab Emirates would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

BACKGROUND

The Commission instituted these reviews on November 1, 2021 (86 FR 60289) and determined on February 4, 2022 that it would conduct full reviews (87 FR 9641, February 22, 2022). Notice of the scheduling of the Commission’s reviews and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* on June 21, 2022 (87 FR 36881). Since no party to the investigation requested a hearing, the public hearing in connection with the reviews, originally scheduled for October 13, 2022, was cancelled (87 FR 62890, October 17, 2022).

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

Views of the Commission

Based on the record in these five-year reviews, we determine under section 751(c) of the Tariff Act of 1930, as amended (“the Tariff Act”), that revocation of the antidumping duty orders on circular welded carbon-quality steel pipe (“CWP”) from Oman, Pakistan, and the United Arab Emirates would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

I. Background

On October 28, 2015, Bull Moose Tube Company, EXLTUBE, Wheatland Tube, and Western Tube and Conduit, domestic producers of CWP, filed antidumping duty petitions regarding imports of CWP from Oman, Pakistan, the Philippines, the United Arab Emirates (“UAE”), and Vietnam and a countervailing duty petition regarding imports of CWP from Pakistan.¹ The Commission determined in December 2016 that a domestic industry was materially injured by reason of less-than-fair-value (“LTFV”) imports of CWP from Oman, Pakistan, and the UAE.² On December 19, 2016, Commerce published the antidumping duty orders on imports of CWP from Oman, Pakistan, and the UAE.³

¹ See *Circular Welded Carbon-Quality Steel Pipe from Oman, Pakistan, the Philippines, the United Arab Emirates, and Vietnam; Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations*, 80 Fed. Reg. 67790 (Nov. 3, 2015). In the preliminary phase of the investigations, the Commission found that imports from the Philippines were negligible and terminated the antidumping duty investigation with respect to the Philippines. See *Circular Welded Carbon-Quality Steel Pipe from Oman, Pakistan, the Philippines, the United Arab Emirates, and Vietnam*, 80 Fed. Reg. 79093 (Dec. 18, 2015).

² See *Circular Welded Carbon-Quality Steel Pipe from Oman, Pakistan, the United Arab Emirates, and Vietnam*, Inv. Nos. 701-TA-549 and 731-TA-1299, 1300, 1302, and 1301 (Final), USITC Pub. 4651 (Dec. 2016) (“Original Determinations”) at 1. Commissioners Dean A. Pinkert, Meredith M. Broadbent, and F. Scott Kieff dissented with respect to LTFV imports from Pakistan. *Id.* The Commission also determined that imports of CWP from Vietnam that had been found by Commerce to be sold in the United States at LTFV and imports of CWP from Pakistan that are subsidized by the government of (Continued...)

On November 1, 2021, the Commission instituted these first reviews of the antidumping duty orders on imports of CWP from Oman, Pakistan, and the UAE.⁴ The Commission received a joint response to the notice of institution from four domestic producers of CWP: Bull Moose Tube Company, Maruichi American Corporation, Nucor Tubular Products Inc., and Wheatland Tube Company.⁵ All four companies (collectively, “Domestic Producers”) submitted joint prehearing and posthearing briefs and written responses to Commission questions.^{6,7} The Commission also received a joint response to the notice of institution and a prehearing brief and written responses to Commission questions from Universal Tube and Plastic Industries, Ltd., KHK Scaffolding and Formwork LLC, THL Pipe and Tube Industries LLC (collectively, “Universal Respondents”), UAE producers and exporters of CWP.⁸ It also received a response to the notice of institution from Ajmal Steel Tube and Pipe Ind., LLC (“Ajmal”), a UAE producer.⁹

(...Continued)

Pakistan were negligible and terminated the antidumping duty investigation with respect to Vietnam and the countervailing duty investigation with respect to Pakistan. *Id.*

³ See *Circular Welded Carbon-Quality Steel Pipe from the Sultanate of Oman, Pakistan, and the United Arab Emirates: Amended Final Affirmative Antidumping Duty Determination and Antidumping Duty Orders*, 81 Fed. Reg. 91906 (Dec. 19, 2016).

⁴ See *Circular Welded Carbon-Quality Steel Pipe from Oman, Pakistan, and the United Arab Emirates; Institution of Five-Year Reviews*, 86 Fed. Reg. 60289 (Nov. 1, 2021).

⁵ Domestic Producers’ Joint Substantive Response to Notice of Institution, Dec. 1, 2021.

⁶ Prehearing Brief of Domestic Producers, Sept. 30, 2022 (“Domestic Producers’ Prehear. Br.”); Posthearing Brief of Domestic Producers, Oct. 25, 2022 (“Domestic Producers’ Posthear. Br.”). The Commission received final comments from Domestic Producers on November 21, 2022.

⁷ On October 7, 2022, counsel for Domestic Producers withdrew their requests to participate in the hearing and requested that the Commission cancel the hearing for these reviews citing that no respondent interested parties filed a request to appear at the hearing. Counsel indicated a willingness to submit written responses to any Commission questions in lieu of a hearing. Because no party to the reviews requested to participate in a hearing, the Commission cancelled the public hearing in connection with these reviews scheduled for October 13, 2022 and, instead, issued written questions to the parties. See *Circular Welded Carbon-Quality Steel Pipe from Oman, Pakistan, and the United Arab Emirates; Cancellation of Hearing for Full Five-Year Reviews*, 87 Fed. Reg. 62890 (Oct. 17, 2022).

⁸ Universal Respondents’ Joint Substantive Response to the Notice of Institution, Dec. 1, 2021 (“Universal Respondents’ Substantive Resp.”); Pre-hearing Brief of Universal Respondents, Sept. 30, (Continued...)

On February 4, 2022, the Commission found that the domestic interested party group response was adequate for all reviews and that the respondent interested party group response with respect to the UAE was adequate for the review of the order on subject imports from the UAE.¹⁰ Therefore, it decided to conduct a full review with respect to the antidumping duty order concerning CWP from the UAE. The Commission further found that the respondent interested party group responses with respect to Oman and Pakistan were inadequate. The Commission determined to conduct full reviews concerning the antidumping duty orders on CWP from Oman and Pakistan to promote administrative efficiency in light of its decision to conduct a full review with respect to the antidumping duty order concerning CWP from the UAE.¹¹

U.S. industry data in these reviews are based on questionnaire responses from seven U.S. producers that are believed to account for a majority of U.S. production of CWP during 2021.¹² U.S. import data and related information are based on official Department of Commerce (“Commerce”) statistics and the responses of 14 U.S. importers of CWP that are

(...Continued)

2022 (“Universal Respondents’ Prehear. Br.”); Response to Commission Questions in Lieu of Hearing, Oct. 25, 2022 (“Universal Respondents’ Resp. to Commission Questions”). Universal Respondents state that Universal Tube and Plastic Industries, Ltd., in addition to being a UAE producer and exporter of CWP, also acted as a non-resident U.S. importer of record for some shipments of its own exports of subject merchandise to the United States. See Universal Respondents’ Substantive Resp. at 8, 10 and Exh. 6; Universal Respondents’ Joint Supplemental Response to the Notice of Institution, Dec. 9, 2021, at 1.

⁹ Ajmal’s Substantive Response to Notice of Institution, Dec. 1, 2021 (“Ajmal’s Substantive Resp.”).

¹⁰ See *Circular Welded Carbon-Quality Steel Pipe from Oman, Pakistan, and the United Arab Emirates; Notice of Commission Determination to Conduct Full Five-Year Reviews*, 87 Fed. Reg. 9641 (Feb. 22, 2022).

¹¹ See 87 Fed. Reg. at 9642.

¹² Confidential Report, Memorandum INV-UU-110 (Nov. 9, 2022) (“CR”) / Public Report (“PR”) at III-1.

believed to have accounted for *** percent of subject imports and *** percent of total imports in 2021.¹³ Data and related information on the CWP industry in Oman are based on the questionnaire response of Al Jazeera Steel Products Co. SAOG (“Al Jazeera”), which accounted for *** CWP production in Oman in 2021, and on industry research and public export data.¹⁴ No responses to the Commission’s foreign producer questionnaire were received from producers of CWP in Pakistan; consequently, data and related information on the CWP industry in Pakistan are based on industry research, public export data, and information provided by the parties.¹⁵ Data and related information on the CWP industry in the UAE are based on the questionnaire responses from six producers/exporters of CWP in the UAE, which are estimated to account for 72.8 percent of CWP production in the UAE in 2021, and on industry research and public export data.¹⁶

II. Domestic Like Product and Industry

A. Domestic Like Product

In making its determination under section 751(c) of the Tariff Act, the Commission defines the “domestic like product” and the “industry.”¹⁷ The Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and

¹³ CR/PR at IV-1. The official Commerce statistics are based on seven primary U.S. Harmonized Tariff Schedule (“HTSUS”) statistical reporting numbers (7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090), which are believed to account for the majority of imports of CWP. *Id.* at n.3.

¹⁴ CR/PR at IV-26.

¹⁵ CR/PR at IV-39. In these reviews, the Commission received no questionnaire responses from 10 firms identified as possible producers/exporters of CWP in Pakistan. *Id.*

¹⁶ CR/PR at IV-42.

¹⁷ 19 U.S.C. § 1677(4)(A).

uses with, the article subject to an investigation under this subtitle.”¹⁸ The Commission’s practice in five-year reviews is to examine the domestic like product definition from the original investigation and consider whether the record indicates any reason to revisit the prior findings.¹⁹

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

welded carbon-quality steel pipes and tube, of circular cross-section, with an outside diameter (O.D.) not more than nominal 16 inches (406.4 mm), regardless of wall thickness, surface finish (e.g., black, galvanized, or painted), end finish (plain end, beveled end, grooved, threaded, or threaded and coupled), or industry specification (e.g., American Society for Testing and Materials International (ASTM), proprietary, or other), generally known as standard pipe, fence pipe and tube, sprinkler pipe, and structural pipe (although subject product may also be referred to as mechanical tubing). Specifically, the term “carbon quality” includes products in which:

(a) iron predominates, by weight, over each of the other contained elements;
(b) the carbon content is 2 percent or less, by weight; and
(c) none of the elements listed below exceeds the quantity, by weight, as indicated:

(i) 1.80 percent of manganese;
(ii) 2.25 percent of silicon;
(iii) 1.00 percent of copper;
(iv) 0.50 percent of aluminum;
(v) 1.25 percent of chromium;
(vi) 0.30 percent of cobalt;
(vii) 0.40 percent of lead;

¹⁸ 19 U.S.C. § 1677(10); see, e.g., *Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Dep’t of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996); *Torrington Co. v. United States*, 747 F. Supp. 744, 748-49 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991); see also S. Rep. No. 249, 96th Cong., 1st Sess. 90-91 (1979).

¹⁹ See, e.g., *Internal Combustion Industrial Forklift Trucks from Japan*, Inv. No. 731-TA-377 (Second Review), USITC Pub. 3831 at 8-9 (Dec. 2005); *Crawfish Tail Meat from China*, Inv. No. 731-TA-752 (Review), USITC Pub. 3614 at 4 (July 2003); *Steel Concrete Reinforcing Bar from Turkey*, Inv. No. 731-TA-745 (Review), USITC Pub. 3577 at 4 (Feb. 2003).

- (viii) 1.25 percent of nickel;*
- (ix) 0.30 percent of tungsten;*
- (x) 0.15 percent of molybdenum;*
- (xi) 0.10 percent of niobium;*
- (xii) 0.41 percent of titanium;*
- (xiii) 0.15 percent of vanadium; or*
- (xiv) 0.15 percent of zirconium.*

Covered products are generally made to standard O.D. and wall thickness combinations. Pipe multi-stenciled to a standard and/or structural specification and to other specifications, such as American Petroleum Institute (API) API-5L specification, may also be covered by the scope of these investigations. In particular, such multi-stenciled merchandise is covered when it meets the physical description set forth above, and also has one or more of the following characteristics: is 32 feet in length or less; is less than 2.0 inches (50 mm) in outside diameter; has a galvanized and/or painted (e.g., polyester coated) surface finish; or has a threaded and/or coupled end finish.²⁰

The scope definition provides further information about the nature of the covered products.²¹ It also expressly excludes certain products.²²

²⁰ *Circular Welded Carbon-Quality Steel Pipe from Oman, Pakistan, and the United Arab Emirates: Final Results of Expedited Sunset Reviews of Antidumping Duty Orders*, 87 Fed. Reg. 9315 (Feb. 18, 2022) and accompanying *Issues and Decision Memorandum*.

²¹ The scope definition states:

Standard pipe is ordinarily made to ASTM specifications A53, A135, and A795, but can also be made to other specifications. Structural pipe is made primarily to ASTM specifications A252 and A500. Standard and structural pipe may also be produced to proprietary specifications rather than to industry specifications.

Sprinkler pipe is designed for sprinkler fire suppression systems and may be made to industry specifications such as ASTM A53 or to proprietary specifications.

Fence tubing is included in the scope regardless of certification to a specification listed in the exclusions below, and can also be made to the ASTM A513 specification. Products that meet the physical description set forth above but are made to the following nominal outside diameter and wall thickness combinations, which are recognized by the industry as typical for fence tubing, are included despite being certified to ASTM mechanical tubing specifications:

(Continued...)

(...Continued)

O.D. in inches (nominal)	Wall thickness in inches (nominal)	Gage
1.315	0.035	20
1.315	0.047	18
1.315	0.055	17
1.315	0.065	16
1.315	0.072	15
1.315	0.083	14
1.315	0.095	13
1.660	0.055	17
1.660	0.065	16
1.660	0.083	14
1.660	0.095	13
1.660	0.109	12
1.900	0.047	18
1.900	0.055	17
1.900	0.065	16
1.900	0.072	15
1.900	0.095	13
1.900	0.109	12
2.375	0.047	18
2.375	0.055	17
2.375	0.065	16
2.375	0.072	15
2.375	0.095	13
2.375	0.109	12
2.375	0.120	11
2.875	0.109	12
2.875	0.165	8
3.500	0.109	12
3.500	0.165	8
4.000	0.148	9
4.000	0.165	8
4.500	0.203	7

The scope also states:

The products subject to these orders are currently classifiable in Harmonized Tariff Schedule of the United States (HTSUS) statistical reporting numbers 7306.19.1010, 7306.19.1050, 7306.19.5110, 7306.19.5150, 7306.30.1000, 7306.30.5015, 7306.30.5020, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055,

(Continued...)

The scope definition has not changed since the original investigations.²³ Standard pipe of non-alloy steel is the primary product within the scope of these reviews. It is intended for the low-pressure conveyance of water, steam, natural gas, air, and other liquids and gases in plumbing and heating systems, air conditioning units, automatic sprinkler systems, and other related uses. Standard pipe is made primarily to American Society for Testing and Materials (“ASTM”) A53, A135, and A795 specifications, but can also be made to other specifications. Other uses of CWP include light load-bearing and mechanical applications, such as for fence tubing, scaffolding components, and protection of electrical wiring, such as conduit shells. Fence tubing is commonly produced to ASTM F1083 specification; however, mills also produce

(...Continued)

7306.30.5085, 7306.30.5090, 7306.50.1000, 7306.50.5030, 7306.50.5050, and 7306.50.5070. The HTSUS subheadings above are provided for convenience and U.S. Customs purposes only. The written description of the scope of the orders is dispositive.

²² The scope of these orders does not include:

- (a) pipe suitable for use in boilers, superheaters, heat exchangers, refining furnaces and feedwater heaters, whether or not cold drawn, which are defined by standards such as ASTM A178 or ASTM A192;
- (b) finished electrical conduit, i.e., Electrical Rigid Steel Conduit (also known as Electrical Rigid Metal Conduit and Electrical Rigid Metal Steel Conduit), Finished Electrical Metallic Tubing, and Electrical Intermediate Metal Conduit, which are defined by specifications such as American National Standard (ANSI) C80.1-2005, ANSI C80.3-2005, or ANSI C80.6-2005, and Underwriters Laboratories Inc. (UL) UL-6, UL-797, or UL-1242;
- (c) finished scaffolding, i.e., component parts of final, finished scaffolding that enter the United States unassembled as a “kit.” A kit is understood to mean a packaged combination of component parts that contains, at the time of importation, all of the necessary component parts to fully assemble final, finished scaffolding;
- (d) tube and pipe hollows for redrawing;
- (e) oil country tubular goods produced to API specifications;
- (f) line pipe produced to only API specifications, such as API 5L, and not multi-stenciled; and
- (g) mechanical tubing, whether or not cold-drawn, other than what is included in the scope definition.

²³ See CR/PR at I-16, n.24.

fence tubing without reference to an ASTM specification or to a general specification such as ASTM A513. CWP is also used for structural applications in general construction. Structural pipe is manufactured primarily to standard ASTM specifications such as A500 or A252 as well as American Society of Mechanical Engineers (“ASME”) specifications.²⁴

In the original investigations, the Commission defined a single domestic like product, consisting of CWP that was coextensive with Commerce’s scope.²⁵ In these reviews, no party argues for a different definition from the original investigations.²⁶ There is no new information in the record suggesting the characteristics and uses of domestically produced CWP have changed since the original investigations to warrant revisiting the definition of the domestic like product in the original investigations.²⁷ In light of this, and absent any argument to the contrary, we define a single domestic like product, consisting of CWP that is coextensive with Commerce’s scope.

B. Domestic Industry

Section 771(4)(A) of the Tariff Act defines the relevant industry as the domestic “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”²⁸ In defining the domestic industry, the Commission’s general practice has been

²⁴ CR/PR at I-24 to I-25.

²⁵ Original Determinations, USITC Pub. 4651 at 9.

²⁶ See CR/PR at I-27; see also Domestic Producers’ Prehear. Br. at 5-6; Universal Respondents’ Prehear. Br. at 1.

²⁷ See CR/PR at I-24 to I-27.

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

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.

In the original investigations, the Commission did not exclude any domestic CWP producer from the domestic industry under section 771(4)(B) of the Tariff Act (the “related parties provision”).²⁹ It determined that domestic CWP producer *** and arguably domestic producer *** were subject to the related party provision.³⁰ The Commission found that appropriate circumstances did not exist to exclude either of these firms given the relatively small volume of subject imports.³¹ The Commission, therefore, defined the domestic industry to include all domestic producers of CWP.³²

In these reviews, Domestic Producers argue that the Commission should again define the domestic industry as all domestic producers of CWP, as it did in the original investigations.³³ No respondent party presented arguments on the definition of the domestic industry.³⁴ There are no related party or other domestic industry issues in these reviews.³⁵ We therefore define the domestic industry as all U.S. producers of CWP.

²⁹ See 19 U.S.C. § 1677(4)(B).

³⁰ Confidential Original Determinations, EDIS Doc. 597917 (Dec. 13, 2016) (“Confidential Original Determinations”) at 12-13.

³¹ Confidential Original Determinations, EDIS Doc. 597917, at 12-13.

³² Original Determinations, USITC Pub. 4651 at 10.

³³ Domestic Producers’ Substantive Resp. at 28.

³⁴ See Universal Respondents’ Prehear. Br. at 1 (stating that “Universal does not contest, and agrees with, the definitions of the ‘domestic like product’ and the ‘domestic industry’ that the Commission adopted in both the investigation and this sunset review”).

³⁵ The record does not indicate that any domestic producer is related to a foreign producer or exporter of the subject merchandise or directly imported the subject merchandise or purchased the subject merchandise from a U.S. importer. See CR/PR at I-28, Table I-11.

III. Cumulation

A. Legal Standard

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

the Commission may cumulatively assess the volume and effect of imports of the subject merchandise from all countries with respect to which reviews under section 1675(b) or (c) of this title were initiated on the same day, if such imports would be likely to compete with each other and with domestic like products in the United States market. The Commission shall not cumulatively assess the volume and effects of imports of the subject merchandise in a case in which it determines that such imports are likely to have no discernible adverse impact on the domestic industry.³⁶

Cumulation therefore is discretionary in five-year reviews, unlike original investigations, which are governed by section 771(7)(G)(i) of the Tariff Act.³⁷ The Commission may exercise its discretion to cumulate, however, only if the reviews are initiated on the same day, the Commission determines that the subject imports are likely to compete with each other and the domestic like product in the U.S. market, and imports from each such subject country are not likely to have no discernible adverse impact on the domestic industry in the event of revocation. Our focus in five-year reviews is not only on present conditions of competition, but also on likely conditions of competition in the reasonably foreseeable future.

³⁶ 19 U.S.C. § 1675a(a)(7).

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

B. Original Investigations

In the original investigations, the Commission found a reasonable overlap of competition among subject imports from Oman, Pakistan, and the UAE and between subject imports and the domestic like product.³⁸ The Commission found that there was an overlap of channels of distribution, as the majority of CWP shipments were to distributors, regardless of source, and a geographic overlap in the *** region.³⁹ It also found that imports from each subject country were simultaneously present in the U.S. market.⁴⁰ The Commission found that imports from Oman, Pakistan, and the UAE were fungible with the domestic like product and with each other.⁴¹ It acknowledged that subject imports from Pakistan generally lacked ASTM certification, were perceived somewhat differently by purchasers than the domestic like product, and were distributed in a more limited geographic area than the domestic like product or the other subject imports. Nevertheless, the Commission found that there was sufficient overlap of customers, distribution patterns, and uses between the subject imports from Pakistan and the domestic like product, as well as some perceptions of interchangeability and comparability.⁴² Consequently, the Commission found that there was a reasonable overlap of competition between the domestic like product and subject imports from Oman, Pakistan, and the UAE and between imports from each of these subject countries; therefore, it cumulated subject imports from Oman Pakistan, and the UAE for purposes of its material injury analysis.⁴³

³⁸ Original Determinations, USITC Pub. 4651 at 16.

³⁹ Confidential Original Determinations, EDIS Doc. 597917, at 22-23.

⁴⁰ Original Determinations, USITC Pub. 4651 at 17.

⁴¹ Original Determinations, USITC Pub. 4651 at 18.

⁴² Original Determinations, USITC Pub. 4651 at 18-19.

⁴³ Original Determinations, USITC Pub. 4651 at 19. In their dissenting views, Commissioners Pinkert, Broadbent, and Kieff found that imports from Pakistan should not be cumulated with imports (Continued...)

C. Arguments of the Parties

Domestic Producers' Arguments. Domestic Producers argue that the Commission should cumulate subject imports from all three countries, as it did in the original investigations.⁴⁴ They contend that CWP imports from each subject country are likely to have a discernible adverse impact on the domestic industry if the orders are revoked.⁴⁵ Domestic Producers maintain that there is a reasonable overlap of competition between subject imports and the domestic like product as well as among subject imports because imports from Oman and the UAE continue to engage in head-to-head competition with each other and the domestic like product and imports from Pakistan would likely do so upon revocation.⁴⁶ Finally, Domestic Producers contend that subject imports from Oman, Pakistan, and the UAE are likely to compete under similar conditions of competition in the U.S. market in the event the orders were revoked. With respect to cumulating imports from Pakistan with imports from Oman and UAE, they claim that, according to Pakistani producer International Industries Limited's ("IIL's") website, IIL appears to have obtained certification for its products under several ASTM standards, unlike in the original investigations.⁴⁷

(...Continued)

from Oman and the UAE. *Id.* at 33. They found that imports from Pakistan were not fungible with other subject imports or the domestic like product, as imports from Pakistan were suitable for use only as commercial fence tubing, a small segment of the overall CWP market in the United States, while imports from Oman and the UAE and the domestic like product were suitable for multiple end-use applications beyond commercial fence tubing. *Id.* at 34.

⁴⁴ Domestic Producers' Prehear. Br. at 6; Domestic Producers' Posthear. Br. at 3.

⁴⁵ Domestic Producers' Prehear. Br. at 10-23.

⁴⁶ Domestic Producers' Prehear. Br. at 24.

⁴⁷ Domestic Producers' Prehear. Br. at 29 & n.103; *see also* Domestic Producers' Posthear. Br. at Answers to Commission Questions in Lieu of Hearing at 14-16.

Respondents' Arguments. No respondent party presented arguments on the issue of cumulation.⁴⁸

D. Analysis

In these reviews, the statutory threshold for cumulation is satisfied because all reviews were initiated on the same day: November 1, 2021.⁴⁹ In addition, we consider the following issues in deciding whether to exercise our discretion to cumulate the subject imports: (1) whether imports from any of the subject countries are precluded from cumulation because they are likely to have no discernible adverse impact on the domestic industry; (2) whether there is a likelihood of a reasonable overlap of competition among subject imports from the subject countries and the domestic like product; and (3) whether subject imports are likely to compete in the U.S. market under different conditions of competition.

1. Likelihood of No Discernible Adverse Impact

The statute precludes cumulation if the Commission finds that subject imports from a country are likely to have no discernible adverse impact on the domestic industry.⁵⁰ Neither the statute nor the Uruguay Round Agreements Act (“URAA”) Statement of Administrative Action (“SAA”) provides specific guidance on what factors the Commission is to consider in determining that imports “are likely to have no discernible adverse impact” on the domestic

⁴⁸ Universal Respondents argue that revocation of the antidumping duty orders on CWP from Oman, Pakistan, and the UAE, whether considered on a separate or cumulated basis, would be unlikely to have an adverse impact on the domestic industry within a reasonably foreseeable time. Universal Respondents’ Substantive Resp. at 3; Universal Respondents’ Resp. to Commission Questions at 7. We address Universal Respondent’s argument regarding the likely impact of subject imports in Section IV.E, below.

⁴⁹ *Circular Welded Carbon-Quality Steel Pipe from Oman, Pakistan, and the United Arab Emirates; Institution of Five-Year Reviews*, 86 Fed. Reg. 60289 (Nov. 1, 2021).

⁵⁰ 19 U.S.C. § 1675a(a)(7).

industry.⁵¹ With respect to this provision, the Commission generally considers the likely volume of subject imports and the likely impact of those imports on the domestic industry within a reasonably foreseeable time if the orders are revoked. Our analysis for each of the subject countries takes into account, among other things, the nature of the product and the behavior of subject imports in the original investigations. We consider the data pertinent to each subject country below.

Oman. During the original investigations, U.S. imports of subject merchandise from Oman increased irregularly, increasing from *** short tons in 2013 to *** short tons in 2014, then declining to *** short tons in 2015; they were *** short tons in interim 2015 and *** short tons in interim 2016.⁵² U.S. shipments of subject imports from Oman accounted for *** percent of apparent U.S. consumption in 2013, *** percent in 2014, and *** percent in 2015; they accounted for *** percent in interim 2015 and *** percent in interim 2016.⁵³

In the final phase of the original investigations, the Commission received a questionnaire response from one producer/exporter of CWP in Oman, Al Jazeera, which accounted for approximately *** percent of CWP exports from Oman to the United States during 2015.⁵⁴ The reporting producer had the capacity to produce *** short tons, produced *** short tons, and had a capacity utilization rate of *** percent in 2015.⁵⁵ On an annual basis, the reporting producer's exports as a share of total shipments of CWP ranged from *** percent

⁵¹ SAA, H.R. Rep. No. 103-316, vol. I at 887 (1994).

⁵² Confidential Report from the Original Investigations, EDIS Doc. 599465 (Dec. 29, 2016) (“Confidential Original Report”), at Table IV-2.

⁵³ Confidential Original Report, EDIS Doc. 599465, at Table IV-13.

⁵⁴ CR/PR at IV-26.

⁵⁵ Confidential Original Report, EDIS Doc. 599465, at Table VII-2.

to *** percent, while its exports to the United States as a share of total shipments ranged from *** percent to *** percent during the original period of investigation (“POI”).⁵⁶

After the antidumping duty order on CWP from Oman was imposed, Commerce conducted three successive administrative reviews and assigned an antidumping duty margin of 3.84 percent in the first administrative review, 1.10 percent in the second administrative review, and 1.56 percent in third administrative review.⁵⁷ Effective March 23, 2018, subject imports from Oman were subject to 25 percent *ad valorem* duties under Section 232.⁵⁸

In these reviews, subject imports from Oman increased irregularly, increasing from 28,147 short tons in 2016 to 48,239 short tons in 2017, 53,704 short tons in 2018, and 54,699 short tons in 2019, before decreasing to 37,375 shorts tons in 2020, and increasing again to 59,018 short tons in 2021; they were 26,594 short tons in interim 2021 and 39,829 short tons in interim 2022.⁵⁹ The share of apparent U.S. consumption accounted for by U.S. shipments of subject imports from Oman increased from 1.6 percent in 2016 to 2.3 percent in 2017, 2.9 percent in 2018, and 3.1 percent in 2019, before decreasing to 2.3 percent in 2020, and increasing again to 3.5 percent in 2021; it was 3.1 percent in interim 2021 and 4.2 percent in interim 2022.⁶⁰

In these reviews, the Commission received a questionnaire response from Al Jazeera, which accounted for *** CWP production in Oman in 2021.⁶¹ Al Jazeera’s capacity to produce

⁵⁶ Confidential Original Report, EDIS Doc. 599465, at Table VII-2.

⁵⁷ CR/PR at Table I-5.

⁵⁸ CR/PR at I-23.

⁵⁹ CR/PR at Table IV-1.

⁶⁰ CR/PR at Table I-13.

⁶¹ CR/PR at IV-26.

CWP remained constant in each year from 2016 to 2021 at *** short tons.⁶² Its production increased irregularly, increasing from *** short tons in 2016 to *** short tons in 2017 and *** short tons in 2018, before decreasing to *** short tons in 2019 and *** short tons in 2020, and increasing again to *** short tons in 2021.⁶³ Al Jazeera's capacity utilization rate increased irregularly, increasing from *** percent in 2016 to *** percent in 2017, before increasing and remaining at *** percent in 2018 and 2019, then decreasing to *** percent in 2020, before increasing again to *** percent in 2021.⁶⁴ It reported production of out-of-scope merchandise on the same equipment and machinery used to produce CWP.⁶⁵ Al Jazeera's end-of-period inventories increased irregularly, increasing from *** short tons in 2016 to *** short tons in 2017, before decreasing to *** short tons in 2018, and increasing again to *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021.⁶⁶

Total shipments of CWP by Al Jazeera increased irregularly, increasing from *** short tons in 2016 to *** short tons in 2017 and *** short tons in 2018, before decreasing to *** short tons in 2019, and *** short tons in 2020, and increasing again to *** shorts tons in 2021; they were *** short tons in interim 2021 and interim 2022.⁶⁷ Exports of CWP from Oman increased irregularly, increasing from *** short tons in 2016 to *** short tons in 2017 and *** short tons in 2018, before decreasing to *** short tons in 2019, and *** short tons in 2020, and

⁶² CR/PR at Table IV-13. Al Jazeera did not provide data for interim 2021 and interim 2022.

⁶³ CR/PR at Table IV-13.

⁶⁴ CR/PR at Table IV-13.

⁶⁵ CR/PR at IV-34. Its overall capacity remained unchanged from 2016 to 2021 at *** short tons. CR/PR at Table IV-15. The share of its overall production attributable to CWP increased irregularly, increasing from *** percent in 2016 to *** percent in 2017, *** percent in 2018, and *** percent in 2019, before decreasing to *** percent in 2020, and increasing again to *** percent in 2021. *Id.*

⁶⁶ CR/PR at Table IV-13.

⁶⁷ CR/PR at Table IV-13.

increasing again to *** short tons in 2021; they were *** short tons in interim 2020 and interim 2021.⁶⁸ On an annual basis, between *** percent and *** percent of Al Jazeera's total shipments were exported; between *** percent and *** percent of Al Jazeera's total shipments during any year were directed to the United States.⁶⁹ The United States was the largest export market for welded tubes, pipes, and hollow profiles of iron or nonalloy steel, a category that includes CWP and out-of-scope products, from Oman in 2021, followed by the UAE and Qatar.⁷⁰ Effective December 2012, CWP from Oman have been subject to an antidumping order in Canada.⁷¹

In the original investigations, subject imports from Oman undersold the domestic like product in 38 of 45 comparisons (84.4 percent) with underselling margins ranging from *** to *** percent.⁷² In these reviews, subject imports from Oman undersold the domestic like product in *** of *** comparisons (*** percent) with underselling margins ranging from *** to *** percent.⁷³

In light of the foregoing, including that subject imports from Oman have increased their presence in the U.S. market, the excess capacity and export orientation of the CWP industry in Oman, and the relative attractiveness of the U.S. market given that it is the largest export

⁶⁸ CR/PR at Table IV-13.

⁶⁹ CR/PR at Tables IV-13, IV-14.

⁷⁰ CR/PR at Table IV-16. Exports of welded tubes, pipes, and hollow profiles of iron or nonalloy steel from Oman to the United States in 2021 (59,018 short tons) were more than double those to the UAE (26,815 short tons) and almost six times as large as those to Qatar (9,964 short tons). *Id.*

⁷¹ CR/PR at IV-61 to IV-62.

⁷² Confidential Original Report, EDIS Doc. 599465, at Table V-8.

⁷³ CR/PR at Table V-11. Although the average unit value ("AUV") of Al Jazeera's exports to the United States remained lower than the AUV of its exports to other markets, the AUV of its exports to the United States was still higher than the AUV of its home market shipments throughout the period of review ("POR"). CR/PR at Tables IV-13 and IV-14.

market, we find that revocation of the antidumping duty order on subject imports from Oman is not likely to have no discernible adverse impact on the domestic industry.

Pakistan. During the original investigations, U.S. imports of subject merchandise from Pakistan increased from *** short tons in 2013 to *** short tons in 2014 and *** short tons in 2015; they were *** short tons in interim 2015 and *** short tons in interim 2016.⁷⁴ U.S. shipments of subject imports from Pakistan accounted for *** percent of apparent U.S. consumption in 2013, *** percent in 2014, and *** percent in 2015; they accounted for *** percent in interim 2015 and *** percent in interim 2016.⁷⁵

In the final phase of the original investigations, the Commission received a questionnaire response from one producer/exporter of CWP in Pakistan, IIL, which accounted for approximately *** percent of CWP exports from Pakistan to the United States in 2015.⁷⁶ The reporting producer had the capacity to produce *** short tons, produced *** short tons, and had a capacity utilization rate of *** percent for CWP in 2015.⁷⁷ On an annual basis, the reporting producer's exports as a share of total shipments of CWP ranged from *** percent to *** percent, while its exports to the United States as a share of total shipments ranged from *** percent to *** percent during the POI.⁷⁸

After the antidumping duty order on CWP from Pakistan was imposed, Commerce did not conduct any administrative reviews of the outstanding order on CWP from Pakistan.

⁷⁴ Confidential Original Report, EDIS Doc. 599465, at Table IV-2.

⁷⁵ Confidential Original Report, EDIS Doc. 599465, at Table IV-13.

⁷⁶ CR/PR at IV-36.

⁷⁷ Confidential Original Report, EDIS Doc. 599465, at Table VII-7.

⁷⁸ Confidential Original Report, EDIS Doc. 599465, at Table VII-7.

However, effective March 23, 2018, subject imports from Pakistan were subject to 25 percent *ad valorem* duties under Section 232.⁷⁹

In these reviews, subject imports from Pakistan decreased irregularly, decreasing from 7,010 short tons in 2016 to zero short tons in 2017, before increasing to 535 short tons in 2018, and decreasing again to 95 short tons in 2019, zero short tons in 2020, and increasing to 57 short tons in 2021; they were zero short tons in interim 2021 and interim 2022.⁸⁰ The share of apparent U.S. consumption accounted for by U.S. shipments of subject imports from Pakistan was 0.4 percent in 2016 and near or at zero for the remainder of the POR.⁸¹

In these reviews, the Commission did not receive any questionnaire responses from any producer/exporter of CWP in Pakistan.⁸² Domestic Producers have provided evidence indicating that IIL, the largest pipe producer in Pakistan, has reported in its 2022 annual report that it can produce as much as 585,000 metric tons (644,852 short tons) of steel pipe (a category that would include both in- and out-of-scope product) annually, that it produced 144,539 metric tons, and therefore the company has 440,461 metric tons (485,525 short tons) of excess capacity available.⁸³ Exports of welded tubes, pipes, and hollow profiles of iron or nonalloy steel, a category that includes CWP and out-of-scope products, from Pakistan decreased irregularly, decreasing from 53,211 short tons in 2016 to 46,150 shorts tons in 2017, 41,982 short tons in 2018, 23,001 short tons in 2019, and 20,970 short tons in 2020, before

⁷⁹ CR/PR at I-23.

⁸⁰ CR/PR at Table IV-1.

⁸¹ CR/PR at Table I-13.

⁸² CR/PR at IV-39.

⁸³ Domestic Producers' Prehear. Br. at 15, Exhibit 8.

increasing to 27,298 short tons in 2021.⁸⁴ The largest export markets for the category that includes CWP from Pakistan in 2021 were Australia, Sri Lanka, and Germany.⁸⁵ Effective February 15, 2019, CWP from Pakistan have been subject to an antidumping order in Canada.⁸⁶

In the original investigations, subject imports from Pakistan undersold the domestic like product in 22 of 33 comparisons (two-thirds or 66.7 percent) with underselling margins ranging from *** to *** percent.⁸⁷ In these reviews, no importer provided price data for subject imports from Pakistan.⁸⁸

In light of the foregoing, including the increase in subject imports from Pakistan during the original POI, the apparent restraining effect of the order, the Pakistani industry's excess capacity with respect to steel pipe that includes CWP, the industry's export orientation in the original investigations, and the relative attractiveness of the U.S. market given that it was the largest export market in the original investigations, we find that revocation of the antidumping duty order on subject imports from Pakistan is not likely to have no discernible adverse impact on the domestic industry.

United Arab Emirates. During the original investigations, U.S. imports of subject merchandise from the UAE increased from *** short tons in 2013 to *** short tons in 2014 and to *** short tons in 2015; they were *** short tons in interim 2015 and *** short tons in

⁸⁴ CR/PR at Table IV-17.

⁸⁵ CR/PR at Table IV-17. The United States was the largest export market for CWP produced in Pakistan during 2015 (29,593 short tons), the last year of the original POI, followed by Sri Lanka (19,007 short tons). Original Determinations, USITC Pub. 4651 at Table VII-9. Furthermore, during the original POI, the AUV of exports of CWP from Pakistan to the United States was higher than most alternative export markets, besides Sri Lanka, Canada, and Ireland. See *id.*

⁸⁶ CR/PR at IV-62.

⁸⁷ Confidential Original Report, EDIS Doc. 599465, at Table V-8.

⁸⁸ CR/PR at V-7.

interim 2016.⁸⁹ U.S. shipments of subject imports from the UAE accounted for *** percent of apparent U.S. consumption in 2013, *** percent in 2014, and *** percent in 2015; they accounted for *** percent in interim 2015 and *** percent in interim 2016.⁹⁰

In the final phase of the original investigations, the Commission received questionnaire responses from six producers/exporters of CWP in the UAE, which accounted for approximately *** percent of CWP exports from the UAE to the United States in 2015.⁹¹ The reporting producers had the aggregated capacity to produce *** short tons, produced *** short tons, and had a capacity utilization rate of *** percent for CWP in 2015.⁹² On an annual basis, the reporting producers' exports as a share of total shipments of CWP ranged from *** percent to *** percent, while its exports to the United States as a share of total shipments ranged from *** percent to *** percent during the POI.⁹³

After the antidumping duty order on CWP from the UAE was imposed, Commerce conducted four successive administrative reviews and assigned antidumping duty margins ranging from 1.65 to 1.83 percent in the first administrative review, 2.49 to 3.63 percent in the second administrative review, 1.62 to 54.27 percent in third administrative review, and 2.27 to 3.54 percent in the fourth administrative review.⁹⁴ Effective March 23, 2018, subject imports from the UAE were subject to 25 percent *ad valorem* duties under Section 232.⁹⁵

⁸⁹ Confidential Original Report, EDIS Doc. 599465, at Table IV-2.

⁹⁰ Confidential Original Report, EDIS Doc. 599465, at Table IV-13.

⁹¹ CR/PR at IV-39.

⁹² Confidential Original Report, EDIS Doc. 599465, at Table VII-12.

⁹³ Confidential Original Report, EDIS Doc. 599465, at Table VII-12.

⁹⁴ CR/PR at Table I-6.

⁹⁵ CR/PR at I-23.

In these reviews, subject imports from the UAE increased irregularly, increasing from 52,872 short tons in 2016 to 106,132 short tons in 2017, before decreasing to 84,969 short tons in 2018, and increasing again to 87,388 short tons in 2019, 105,116 short tons in 2020, and 113,982 short tons in 2021; they were 51,845 short tons in interim 2021 and 68,128 short tons in interim 2022.⁹⁶ Responding U.S. importers reported that they had arranged for imports of subject merchandise from the UAE in the amount of *** short tons after June 30, 2022 until the end of 2022.⁹⁷ The share of apparent U.S. consumption accounted for by U.S. shipments of subject imports from the UAE increased from 3.0 percent in 2016 to 5.0 percent in 2017, before decreasing to 4.5 percent in 2018, and increasing again to 5.0 percent in 2019, 6.3 percent in 2020, and 6.8 percent in 2021; it was 6.1 percent in interim 2021 and 7.1 percent in interim 2022.⁹⁸

In these reviews, the Commission received questionnaire responses from six firms that are estimated to account for 72.8 percent of CWP production in the UAE in 2021.⁹⁹ The reported production capacity of the CWP industry in the UAE increased from *** short tons in 2016 to *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, and *** short tons in 2020 and 2021; it was *** short tons in interim 2021 and *** short tons in interim 2022.¹⁰⁰ Its production increased irregularly, increasing from *** short tons in 2016 to *** short tons in 2017, before decreasing to *** short tons in 2018, and increasing again to *** short tons in 2019, and decreasing again to *** short tons in 2020 and *** short tons in 2021; it

⁹⁶ CR/PR at Table IV-1.

⁹⁷ CR/PR at Table IV-10.

⁹⁸ CR/PR at Table I-13.

⁹⁹ CR/PR at IV-42.

¹⁰⁰ CR/PR at Table IV-21.

was *** short tons in interim 2021 and *** short tons in interim 2022.¹⁰¹ Its capacity utilization rate decreased irregularly, increasing from *** percent in 2016 to *** percent in 2017, before decreasing to *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021; it was *** percent in interim 2021 and *** percent in interim 2022.¹⁰² *** of the six reporting producers reported production of out-of-scope merchandise on the same equipment and machinery used to produce CWP.¹⁰³ End-of-period inventories for the CWP industry in the UAE increased irregularly, decreasing from *** short tons in 2016 to *** short tons in 2017, before increasing to *** short tons in 2018, decreasing to *** short tons in 2019, and increasing again to *** short tons in 2020, and *** short tons in 2021; they were *** short tons in interim 2021 and *** short tons in interim 2022.¹⁰⁴

Total shipments of CWP by the industry in the UAE increased irregularly, increasing from *** short tons in 2016 to *** short tons in 2017, before decreasing to *** short tons in 2018, increasing to *** short tons in 2019, and decreasing again to *** short tons in 2020, and *** short tons in 2021; they were *** short tons in interim 2021 and *** short tons in interim 2022.¹⁰⁵ Exports of CWP from the UAE increased irregularly, increasing from *** short tons in 2016 to *** short tons in 2017, before decreasing to *** short tons in 2018, increasing to ***

¹⁰¹ CR/PR at Table IV-21.

¹⁰² CR/PR at Table IV-21.

¹⁰³ CR/PR at Table II-4. The industry's overall capacity increased from *** short tons in 2016 to *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, and *** short tons in 2020 and 2021; it was *** short tons in interim 2021 and *** short tons in interim 2022. CR/PR at Table IV-23. The share of its overall production attributable to CWP decreased irregularly, decreasing from *** percent in 2016 to *** percent in 2017 and *** percent in 2018, before increasing to *** percent in 2019, and decreasing again to *** percent in 2020, and *** percent in 2021; it was *** percent in interim 2021 and *** percent in interim 2022. *Id.*

¹⁰⁴ CR/PR at Table IV-21.

¹⁰⁵ CR/PR at Table IV-21.

short tons in 2019, and decreasing again to *** short tons in 2020, and *** short tons in 2021; they were *** short tons in interim 2021 and *** short tons in interim 2022.¹⁰⁶ On an annual basis, between *** percent and *** percent of the reporting producers' total shipments were exported; between *** percent and *** percent of the reporting producers' total shipments during any year were directed to the United States.¹⁰⁷ The United States was the largest export market for welded tubes, pipes, and hollow profiles of iron or nonalloy steel, a category that includes CWP and out-of-scope products, from the UAE in 2021, followed by Canada and Oman.¹⁰⁸ Effective December 2012, CWP from the UAE have been subject to an antidumping order in Canada.¹⁰⁹

In the original investigations, subject imports from the UAE undersold the domestic like product in 41 of 56 comparisons (73.2 percent) with underselling margins ranging from *** to *** percent.¹¹⁰ In these reviews, subject imports from the UAE undersold the domestic like product in *** of *** comparisons (*** percent) with underselling margins ranging from *** to *** percent.¹¹¹

¹⁰⁶ CR/PR at Table IV-21.

¹⁰⁷ CR/PR at Tables IV-21 and IV-22.

¹⁰⁸ CR/PR at Table IV-24. Exports of welded tubes, pipes, and hollow profiles of iron or nonalloy steel from the UAE to the United States in 2021 (114,020 short tons) were more than double those to Canada (51,771 short tons) and were more than 14 times as large as those to Oman (7,949 short tons). *Id.*

¹⁰⁹ CR/PR at IV-61 to IV-62.

¹¹⁰ Confidential Original Report, EDIS Doc. 599465, at Table V-8.

¹¹¹ CR/PR at Table V-11. The AUV for the UAE industry's exports to the United States exceeded the AUV of its exports to the European Union and Asian markets in 2021. CR/PR at Table IV-22.

In light of the foregoing, including the continued and increasing presence of low-priced subject imports from the UAE during the POR,¹¹² the UAE industry's excess capacity, export orientation, and increasing exports to the United States, and the relative attractiveness of the U.S. market given that it is the largest export market, we find that revocation of the antidumping duty order on subject imports from the UAE is not likely to have no discernible adverse impact on the domestic industry.

2. Likelihood of a Reasonable Overlap of Competition

The Commission generally has considered four factors intended to provide a framework for determining whether subject imports compete with each other and with the domestic like product.¹¹³ Only a "reasonable overlap" of competition is required.¹¹⁴ In five-year reviews, the

¹¹² Universal Response contend that the antidumping margins on CWP from the UAE have been relatively low and have not curtailed the import volume of CWP from the UAE since the imposition of the order, and thus elimination of the order will not result in an increase in imports. See Universal Respondents' Substantive Resp. at 5. The evidence does not support their argument. Initially, the volume and market share of subject imports from the UAE declined from 2015 to 2016 due to imposition of antidumping duty order. They then increased in 2017 prior to the imposition of Section 232 measures in early 2018. After the Section 232 measures were imposed, subject imports from the UAE declined in volume and market share in 2018. But then they steadily increased from 2018 to 2021, albeit at a slower rate than during the original POI due, at least in part, to the disciplining effect of the order. See CR/PR at Table I-13; Confidential Original Report, EDIS Doc. 599465, at Tables IV-12 and IV-13.

¹¹³ The four factors generally considered by the Commission in assessing whether imports compete with each other and with the domestic like product are as follows: (1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality-related questions; (2) the presence of sales or offers to sell in the same geographical markets of imports from different countries and the domestic like product; (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and (4) whether subject imports are simultaneously present in the market with one another and the domestic like product. See, e.g., *Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int'l Trade 1989).

¹¹⁴ See *Mukand Ltd. v. United States*, 937 F. Supp. 910, 916 (Ct. Int'l Trade 1996); *Wieland Werke*, 718 F. Supp. at 52 ("Completely overlapping markets are not required."); *United States Steel Group v. United States*, 873 F. Supp. 673, 685 (Ct. Int'l Trade 1994), *aff'd*, 96 F.3d 1352 (Fed. Cir. 1996). We note, however, that there have been investigations where the Commission has found an insufficient (Continued...)

relevant inquiry is whether there likely would be competition if the orders are revoked, even if none currently exists because the subject imports are absent from the U.S. market.¹¹⁵

Fungibility. In the original investigations, the Commission found that imports from Oman, Pakistan, and the UAE were fungible with the domestic like product and each other. The Commission found that there was at least moderate interchangeability among imports from Oman, Pakistan, and the UAE and between imports from each of these subject sources and the domestic like product, and that purchasers found at least some comparability between and among the domestic like product and subject imports. Despite the fact that the vast majority of CWP imported from Pakistan in 2015 did not meet a formal ASTM standard, the Commission observed that CWP from Pakistan is marketed as having equivalent qualities and being generally manufactured to ASTM A53-A standards. Moreover, while subject imports from Pakistan may not have been certified as lead free, most purchasers reported that lead-free product was not important in purchasing decisions. Additionally, the Commission observed that CWP from each subject source and the domestic like product is used for fence tubing, which is the primary application for subject imports from Pakistan and that the record indicated that subject imports from Pakistan share similar end finishes, surface finishes, lengths, and

(...Continued)

overlap in competition and has declined to cumulate subject imports. *See, e.g., Live Cattle from Canada and Mexico*, Inv. Nos. 701-TA-386 and 731-TA-812-813 (Preliminary), USITC Pub. 3155 at 15 (Feb. 1999), *aff'd sub nom., Ranchers-Cattlemen Action Legal Foundation v. United States*, 74 F. Supp. 2d 1353 (Ct. Int'l Trade 1999); *Static Random Access Memory Semiconductors from the Republic of Korea and Taiwan*, Inv. Nos. 731-TA-761-762 (Final), USITC Pub. 3098 at 13-15 (Apr. 1998).

¹¹⁵ *See generally, Cheflene Corp. v. United States*, 219 F. Supp. 2d 1313, 1314 (Ct. Int'l Trade 2002).

thicknesses as imports from Oman and the UAE and the domestic like product and that the pricing data indicated some overlap in product types.¹¹⁶

In these reviews, most purchasers indicated that domestically produced CWP and subject imports from Oman and the UAE were comparable for most purchasing factors; most purchasers rated the domestic like product as superior to CWP from Pakistan on most factors.¹¹⁷ All domestic producers and a plurality of purchasers rated CWP as always interchangeable for each country comparison; half of responding importers rated domestically produced CWP as always interchangeable with CWP from Oman and Pakistan, while a majority of importers rated domestically produced CWP and CWP from the UAE as always and frequently interchangeable.^{118 119} Most U.S. producers reported that differences other than price were never significant when comparing the domestic like product to subject imports from Oman, Pakistan, and the UAE, and among the subject sources.¹²⁰ Half of responding importers rated differences other than price as sometimes significant when comparing the domestic like product to subject imports from Oman and Pakistan and three importers each rated differences other than price as always and sometimes significant when comparing the domestic like

¹¹⁶ Original Determinations, USITC Pub. 4651 at 17-18.

¹¹⁷ See CR/PR at Table II-12. Most purchasers indicated that subject imports from Oman and the UAE were comparable for all purchasing factors. *Id.*

¹¹⁸ CR/PR at Tables II-13 to II-15. All responding importers rated subject imports from Oman, Pakistan, and the UAE as always or frequently interchangeable with each other. *Id.* at Table II-14.

¹¹⁹ The record also indicates that the domestic like product and subject imports from the UAE are fungible with respect to certain attributes, including wall thickness, nominal pipe size, standards, grade of steel, end finishes, surface finishes, and lengths. CR/PR at Tables IV-2 to IV-6. The Commission did not receive any data on wall thickness, nominal pipe size, standards, grade of steel, end finishes, surface finishes, and lengths from U.S. importers of subject imports from Oman or Pakistan.

¹²⁰ CR/PR at Table II-16.

product to subject imports from the UAE.¹²¹ Among purchasers, a plurality reported that differences other than price were always significant when comparing the domestic like product to subject imports from Oman, Pakistan, and the UAE, while a majority or plurality rated differences other than price as never significant when comparing subject imports among each other.¹²²

Geographic Overlap. In the original investigations, majorities of domestic producers reported selling CWP to all regions in the contiguous United States, while subject imports from Oman and the UAE were also sold in all regions of the contiguous United States.¹²³ Although subject imports from Pakistan were *** during the POI, the Commission observed that the domestic like product and subject imports from Oman and the UAE were also sold in ***.¹²⁴

In these reviews, domestic producers reported selling CWP to all regions in the contiguous United States, while importers of subject merchandise from the UAE reported selling to ***, and one responding importer of subject merchandise from Oman reported selling to the *** regions.¹²⁵ According to official U.S. import statistics, U.S. imports from Oman entered through ports located in every region but the Northern region in 2021, while imports

¹²¹ CR/PR at Table II-17. Most responding importers rated differences other than price as always significant when comparing subject imports from the UAE to subject imports from Oman and Pakistan, while one importer each rated differences other than price as always, sometimes, and never significant when comparing subject imports from Oman to subject imports from Pakistan. *Id.*

¹²² CR/PR at Table II-18.

¹²³ Original Determinations, USITC Pub. 4651 at 16-17.

¹²⁴ Confidential Original Determinations, EDIS Doc. 597917, at 22-23.

¹²⁵ CR/PR at Table II-3. The Commission did not receive any data on the geographic distribution of subject imports from Pakistan.

from the UAE entered through ports located in every region. The minimal imports entered from Pakistan in 2021 were entirely through ports in the Western region.¹²⁶

Channels of Distribution. In the original investigations, domestic producers sold mainly to distributors, and subject imports from Oman, Pakistan, and the UAE were sold *** distributors.¹²⁷ In these reviews, domestic producers and importers of CWP from Oman and the UAE sold primarily to distributors during the POR.¹²⁸

Simultaneous Presence in Market. In the original investigations, the Commission found that imports from each subject country were simultaneously present in the U.S. market, with imports of CWP from Oman and the UAE present in the U.S. market in every month of the POI, and imports of CWP from Pakistan present in 38 of the 42 months comprising the POI.¹²⁹ In these reviews, subject imports from Oman were present in every month during the review period except for April 2022, subject imports from Pakistan were present in nine months (three months in 2016, three months in 2018, two months in 2019, and one month in 2021), and subject imports from the UAE were present in every month.¹³⁰

Conclusion. The record in these reviews indicates that the domestic like product and subject imports from Oman and the UAE remain generally fungible, are primarily shipped through the same channels of distribution, overlap geographically to a large degree, and were simultaneously present in the U.S. market throughout most of the POR.

¹²⁶ CR/PR at Table IV-7.

¹²⁷ Confidential Original Determinations, EDIS Doc. 597917, at 22.

¹²⁸ CR/PR at Table II-2. The Commission did not receive any data on channels of distribution for subject imports from Pakistan.

¹²⁹ Original Determinations, USITC Pub. 4651 at 17.

¹³⁰ CR/PR at Table IV-8.

While the record is more limited with respect to subject imports from Pakistan, at least half of responding market participants rated CWP as always or frequently interchangeable when comparing CWP from Pakistan with the domestic like product and with CWP from Oman and the UAE.¹³¹ Furthermore, according to Pakistani producer IIL's website, IIL appears to have obtained certification for its products under several ASTM standards,¹³² unlike in the original investigations, where the Commission observed the lack of certification to ASTM standards for Pakistani product.¹³³ Evidence on the record of these reviews demonstrates that IIL produces CWP for use in the same applications in which the domestic like product and CWP from the UAE and Oman are used,¹³⁴ unlike in the original investigations where the Commission observed that the primary end use application of subject product from Pakistan was as fence tubing, but still found a reasonable overlap in competition with respect to this market segment.¹³⁵

In light of the Commission's findings in the original investigations, the evidence on the record of these reviews, and the lack of any contrary argument from respondent parties, we find that there would likely be a reasonable overlap in competition among and between subject

¹³¹ CR/PR at Tables II-13, II-14, and II-15.

¹³² Domestic Producers' Prehear. Br. at 29 & n.103, Exh. 12 (printout from IIL's website stating that IIL manufactures its products according to international standards and specifications, including ASTM A53, A252, A500, and A795); *see also* Domestic Producers' Posthear. Br. at Exh. 11 (excerpt from IIL's 2022 annual report).

¹³³ Original Determinations, USITC Pub. 4651 at 19.

¹³⁴ Domestic Producers' Posthear. Br. at Answers to Commission Questions in Lieu of Hearing at 14-16, Exhs. 11 to 17 (IIL's annual report and product brochures list steel pipe and tube products for the transmission of potable water, natural gas, oil and other fluids, load-bearing and mechanical applications such as fencing, hand pumps, and scaffolding, and in a variety of structural fabrications and construction applications).

¹³⁵ Original Determinations, USITC Pub. 4651 at 18; *see also* Dissenting Views at 34 ("The record clearly shows that imports from IIL were suitable for use only as commercial fence tubing, while imports from Oman and the UAE and the domestic like product were suitable for multiple end-use applications beyond commercial fence tubing.").

imports from Oman, Pakistan, and the UAE and the domestic like product should the orders be revoked.

3. Likely Conditions of Competition

The record in these reviews does not indicate that there would be significant differences between the conditions of competition under which imports from each subject country are likely to compete if the orders were revoked. Domestic Producers contend that subject imports from Oman, Pakistan, and the UAE are likely to compete under similar conditions of competition in the U.S. market in the event the orders were revoked,¹³⁶ and no respondent party has contested the issue. For the reasons discussed above, and absent any argument to the contrary, we find that imports from each subject country are likely to compete under similar conditions of competition in the U.S. market if the orders were revoked.

4. Conclusion

Based on the foregoing, we find that subject imports from Oman, Pakistan, and the UAE would each not be likely to have no discernible adverse impact on the domestic industry if the orders under review were revoked. We also find a likely reasonable overlap of competition among subject imports from different sources and between the subject imports from each subject country and the domestic like product. Finally, we find that imports from each subject country are likely to compete in the U.S. market under similar conditions of competition should the orders be revoked. We therefore exercise our discretion to cumulate subject imports from Oman, Pakistan, and the UAE for purposes of our analysis in these reviews.

¹³⁶ Domestic Producers' Prehear. Br. at 29 & n.103; *see also* Domestic Producers' Posthear. Br. at Answers to Commission Questions in Lieu of Hearing at 14-16.

IV. Revocation of the Antidumping Duty Orders Would Likely Lead to Continuation or Recurrence of Material Injury Within a Reasonably Foreseeable Time

A. Legal Standards

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order “would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.”¹³⁷ The SAA states that “under the likelihood standard, the Commission will engage in a counterfactual analysis; it must decide the likely impact in the reasonably foreseeable future of an important change in the status quo – the revocation or termination of a proceeding and the elimination of its restraining effects on volumes and prices of imports.”¹³⁸ Thus, the likelihood standard is prospective in nature.¹³⁹ The U.S. Court of International Trade (“CIT”) has found that “likely,” as used in the five-year review provisions of the Act, means “probable,” and the Commission applies that standard in five-year reviews.¹⁴⁰

¹³⁷ 19 U.S.C. § 1675a(a).

¹³⁸ SAA at 883-84. The SAA states that “{t}he likelihood of injury standard applies regardless of the nature of the Commission’s original determination (material injury, threat of material injury, or material retardation of an industry). Likewise, the standard applies to suspended investigations that were never completed.” *Id.* at 883.

¹³⁹ While the SAA states that “a separate determination regarding current material injury is not necessary,” it indicates that “the Commission may consider relevant factors such as current and likely continued depressed shipment levels and current and likely continued {sic} prices for the domestic like product in the U.S. market in making its determination of the likelihood of continuation or recurrence of material injury if the order is revoked.” SAA at 884.

¹⁴⁰ See *NMB Singapore Ltd. v. United States*, 288 F. Supp. 2d 1306, 1352 (Ct. Int’l Trade 2003) (“‘likely’ means probable within the context of 19 U.S.C. § 1675(c) and 19 U.S.C. § 1675a(a)”), *aff’d mem.*, 140 Fed. Appx. 268 (Fed. Cir. 2005); *Nippon Steel Corp. v. United States*, 26 CIT 1416, 1419 (2002) (Continued...)

The statute states that “the Commission shall consider that the effects of revocation or termination may not be imminent, but may manifest themselves only over a longer period of time.”¹⁴¹ According to the SAA, a “‘reasonably foreseeable time’ will vary from case-to-case, but normally will exceed the ‘imminent’ timeframe applicable in a threat of injury analysis in original investigations.”¹⁴²

Although the standard in a five-year review is not the same as the standard applied in an original investigation, it contains some of the same fundamental elements. The statute provides that the Commission is to “consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the orders are revoked or the suspended investigation is terminated.”¹⁴³ It directs the Commission to take into account its prior injury determination, whether any improvement in the state of the industry is related to the order or the suspension agreement under review, whether the industry is vulnerable to material injury if an order is revoked or a suspension agreement is terminated, and any findings by Commerce

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(same); *Usinor Industeel, S.A. v. United States*, 26 CIT 1402, 1404 nn.3, 6 (2002) (“more likely than not” standard is “consistent with the court’s opinion;” “the court has not interpreted ‘likely’ to imply any particular degree of ‘certainty’”); *Indorama Chemicals (Thailand) Ltd. v. United States*, 26 CIT 1059, 1070 (2002) (“standard is based on a likelihood of continuation or recurrence of injury, not a certainty”); *Usinor v. United States*, 26 CIT 767, 794 (2002) (“‘likely’ is tantamount to ‘probable,’ not merely ‘possible’”).

¹⁴¹ 19 U.S.C. § 1675a(a)(5).

¹⁴² SAA at 887. Among the factors that the Commission should consider in this regard are “the fungibility or differentiation within the product in question, the level of substitutability between the imported and domestic products, the channels of distribution used, the methods of contracting (such as spot sales or long-term contracts), and lead times for delivery of goods, as well as other factors that may only manifest themselves in the longer term, such as planned investment and the shifting of production facilities.” *Id.*

¹⁴³ 19 U.S.C. § 1675a(a)(1).

regarding duty absorption pursuant to 19 U.S.C. § 1675(a)(4).¹⁴⁴ The statute further provides that the presence or absence of any factor that the Commission is required to consider shall not necessarily give decisive guidance with respect to the Commission's determination.¹⁴⁵

In evaluating the likely volume of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether the likely volume of imports would be significant either in absolute terms or relative to production or consumption in the United States.¹⁴⁶ In doing so, the Commission must consider "all relevant economic factors," including four enumerated factors: (1) any likely increase in production capacity or existing unused production capacity in the exporting country; (2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) the potential for product shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.¹⁴⁷

In evaluating the likely price effects of subject imports if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether there is likely to be significant underselling by the subject imports as compared to the domestic like product and whether the subject imports are likely to enter the

¹⁴⁴ 19 U.S.C. § 1675a(a)(1). Commerce has not issued any duty absorption findings since imposition of the orders. CR/PR at I-18 n.23.

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

¹⁴⁶ 19 U.S.C. § 1675a(a)(2).

¹⁴⁷ 19 U.S.C. § 1675a(a)(2)(A-D).

United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic like product.¹⁴⁸

In evaluating the likely impact of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider all relevant economic factors that are likely to have a bearing on the state of the industry in the United States, including but not limited to the following: (1) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity; (2) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment; and (3) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.¹⁴⁹ All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to which any improvement in the state of the domestic industry is related to the orders under review and whether the industry is vulnerable to material injury upon revocation.¹⁵⁰

¹⁴⁸ See 19 U.S.C. § 1675a(a)(3). The SAA states that “{c}onsistent with its practice in investigations, in considering the likely price effects of imports in the event of revocation and termination, the Commission may rely on circumstantial, as well as direct, evidence of the adverse effects of unfairly traded imports on domestic prices.” SAA at 886.

¹⁴⁹ 19 U.S.C. § 1675a(a)(4).

¹⁵⁰ The SAA states that in assessing whether the domestic industry is vulnerable to injury if the order is revoked, the Commission “considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they may also demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.” SAA at 885.

B. Conditions of Competition and the Business Cycle

In evaluating the likely impact of the subject imports on the domestic industry if an order is revoked, the statute directs the Commission to consider all relevant economic factors “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”¹⁵¹ The following conditions of competition inform our determinations.

1. Demand Conditions

In the original investigations, the Commission found that U.S. demand for CWP is driven by the overall U.S. economy and primarily by nonresidential construction spending, but it is also impacted by residential construction spending.¹⁵² A plurality of U.S. producers of CWP indicated that demand increased during the POI, while importers generally reported that demand was constant or fluctuated. Apparent U.S. consumption of CWP increased by 10.1 percent from 2013 to 2015 and was 19.3 percent lower in interim 2016 than in interim 2015.¹⁵³

In the current reviews, the main drivers of demand for CWP remain the same as in the original investigations. All of these demand indicators increased over the review period, though the impact of the COVID-19 pandemic beginning in 2020 particularly impacted gross domestic product (“GDP”) and construction spending.¹⁵⁴

¹⁵¹ 19 U.S.C. § 1675a(a)(4).

¹⁵² Original Determinations, USITC Pub. 4651 at 23. The Commission observed that a smaller portion of CWP demand is affected by the oil and gas industry. *Id.* at 23-24.

¹⁵³ Original Determinations, USITC Pub. 4651 at 24.

¹⁵⁴ CR/PR at II-9. U.S. gross domestic product increased steadily through the fourth quarter of 2019, then dropped in the first two quarters of 2020 before increasing through the second quarter of 2022, ending at 35.0 percent higher in the second quarter of 2022 compared to the first quarter of 2016. CR/PR at II-9 & Fig. II-1. Construction spending for residential and non-residential applications both increased between January 2016 and August 2022. Non-residential construction spending generally decreased throughout 2022 compared to previous years and remained relatively steady through August 2022. Residential construction spending overtook non-residential construction spending in September (Continued...)

Domestic producers, U.S. importers, and purchasers' responses regarding U.S. demand for CWP since January 1, 2016 were mixed, though most firms reported that it either fluctuated or did not change. Several firms also reported that it increased, although no firms reported a decrease in U.S. demand for CWP since January 1, 2016.¹⁵⁵ Most U.S. producers, U.S. importers, and purchasers reported that they anticipate U.S. demand will either fluctuate or not change over the next two years, though several expect demand to increase.¹⁵⁶

Apparent U.S. consumption increased from 2016 to 2017 by 18.9 percent, then steadily decreased before increasing by 1.1 percent from 2020 to 2021. It decreased overall by 5.5 percent from 2016 to 2021 and was higher by 12.1 percent in interim 2022 than in interim 2021.¹⁵⁷

2. Supply Conditions

In the original investigations, the domestic industry was the largest supplier to the U.S. market, but its market share fell steadily from 2013 to 2015.¹⁵⁸ Of the responding U.S. producers, *** accounted for *** percent of U.S. CWP production in 2015, with other major

(...Continued)

2021 and has generally outpaced non-residential construction spending since. Residential construction spending, non-residential construction spending, and total construction spending increased by 104.6 percent, 20.9 percent, and 54.0 percent, respectively, between January 2016 and June 2022. CR/PR at II-10 & Fig. II-2. Crude oil and natural gas prices fluctuated over the review period, but were higher in August 2022 than in January 2016 by 195.7 and 286.0 percent. CR/PR at II-11 & Fig. II-3.

¹⁵⁵ CR/PR at Table II-5.

¹⁵⁶ CR/PR at Table II-6.

¹⁵⁷ CR/PR at Tables I-13 and C-1. Apparent U.S. consumption was 1.8 million short tons in 2016, 2.1 million short tons in 2017, 1.9 million short tons in 2018, 1.8 million short tons in 2019, 1.7 million short tons in 2020, and 1.7 million short tons in 2021; it was 850,120 short tons in interim 2021 and 953,201 short tons in interim 2022. CR/PR at Table I-13.

¹⁵⁸ Original Determinations, USITC Pub. 4651 at 24.

producers including *** accounting for *** of U.S. CWP production in 2015, respectively.¹⁵⁹

Cumulated subject import market share increased from 2013 to 2015.¹⁶⁰ The market share of nonsubject imports was larger than that for cumulated subject imports.¹⁶¹ It was steady from 2013 to 2014 and increased in 2015.¹⁶²

During the current reviews, the domestic industry continued to be the largest supplier to the U.S. market.¹⁶³ U.S. producers' market share by quantity fluctuated during the POR but increased overall from 55.0 percent of apparent U.S. consumption in 2016 to 62.8 percent in 2021; it was lower at 58.0 percent in interim 2022 than in interim 2021 at 66.2 percent.¹⁶⁴

There were several acquisitions, expansions, prolonged curtailments, and expansions under development reported by U.S. producers over the POR – notably, *** reported that ***, *** reported that ***, and *** reported ***.¹⁶⁵ *** U.S. producer reported increased capacity from 2016 to 2021.¹⁶⁶ The largest increase in U.S. producer's reported capacity occurred between 2016 and 2017 and was largely due to ***.¹⁶⁷ The domestic industry's combined capacity increased irregularly by 6.6 percent from 2016 to 2021 from 1.5 million short tons in 2016 to 1.6 million short tons in 2021; it was 4.5 percent higher in interim 2022 at 828,788

¹⁵⁹ Confidential Original Determinations, EDIS Doc. 597917, at 33-34.

¹⁶⁰ Confidential Original Determinations, EDIS Doc. 597917, at 34.

¹⁶¹ Original Determinations, USITC Pub. 4651 at 24.

¹⁶² Confidential Original Determinations, EDIS Doc. 597917, at 34.

¹⁶³ See CR/PR at Tables I-13. During the original investigations, the domestic industry's market share decreased from 58.9 percent of apparent U.S. consumption in 2013 to 55.9 percent in 2014 and 52.0 percent in 2015. Original Determinations, USITC Pub. 4651 at 24.

¹⁶⁴ CR/PR at Tables I-13. U.S. producers' market share by quantity was 55.0 percent in 2016, 47.5 percent in 2017, 54.9 percent in 2018, 63.0 percent in 2019, 64.5 percent in 2020, and 62.8 percent in 2021; it was 66.2 percent in interim 2021 and 58.0 percent in interim 2022. *Id.*

¹⁶⁵ CR/PR at Tables III-1, III-2, and III-3.

¹⁶⁶ CR/PR at III-8 n.7.

¹⁶⁷ CR/PR at III-8 n.8.

short tons than in interim 2021 at 793,159 short tons.¹⁶⁸ The industry's reported capacity utilization decreased irregularly from 67.6 percent in 2016 to 67.3 percent in 2021; it was lower in interim 2022 at 68.5 percent than in interim 2021 at 72.8 percent.¹⁶⁹

Imports from nonsubject countries were the second largest source of supply to the U.S. market throughout the POR.¹⁷⁰ Nonsubject imports' market share by quantity fluctuated but decreased from 40.1 percent of apparent U.S. consumption in 2016 to 26.9 percent in 2021; it was higher at 30.7 percent in interim 2022 than in interim 2021 at 24.6 percent.¹⁷¹ Nonsubject imports accounted for 72.2 percent of total U.S. imports of CWP in 2021.¹⁷² The largest single source of nonsubject imports during the POR was Canada, while other reported nonsubject sources included Costa Rica, Guatemala, India, Japan, Turkey, and several countries in Southeast Asia.¹⁷³

In these reviews, cumulated subject imports were the smallest source of supply to the U.S. market throughout the POR.¹⁷⁴ Cumulated subject imports' market share, by quantity,

¹⁶⁸ CR/PR at III-8, Table III-4.

¹⁶⁹ CR/PR at Tables III-4. ***. Additionally, ***. CR/PR at III-8 n.6.

¹⁷⁰ See CR/PR at Table I-13. During the original investigations, nonsubject imports increased from *** percent of apparent U.S. consumption in 2013 and 2014 to *** percent in 2015. Confidential Original Determinations, EDIS Doc. 597917 at 34.

¹⁷¹ CR/PR at Table I-13. Nonsubject imports' market share by quantity was 40.1 percent in 2016, 45.2 percent in 2017, 37.6 percent in 2018, 29.0 percent in 2019, 26.9 percent in 2020, and 26.9 percent in 2021; it was 24.6 percent in interim 2021 and 30.7 percent in interim 2022. *Id.*

¹⁷² CR/PR at Table IV-1.

¹⁷³ CR/PR at II-6-II-7.

¹⁷⁴ CR/PR at Table I-13. During the original investigations, cumulated subject imports' share of the U.S. market increased from *** percent of apparent U.S. consumption in 2013 to *** percent in 2015. Confidential Original Determinations, EDIS Doc. 597917 at 34.

increased from 5.0 percent of apparent U.S. consumption in 2016 to 10.3 percent in 2021; it was higher at 11.3 percent in interim 2022 than in interim 2021 at 9.2 percent.¹⁷⁵

Most U.S. producers, importers, and purchasers reported that they did not experience any supply constraints since January 1, 2016.¹⁷⁶ The firms that did report supply disruptions, however, did so for a variety of reasons, including order limitations, shipping disruptions, lack of raw materials, and constraints on CWP from a nonsubject source due to Section 232 measures.¹⁷⁷ Many of the firms reporting supply disruptions cited 2021 as the worst-affected year.¹⁷⁸

3. Substitutability and Other Conditions

In the original investigations, the Commission found a moderate degree of substitutability between the domestic like product and cumulated subject imports and that price was an important consideration for purchasers of CWP.¹⁷⁹ During the original POI, raw material costs accounted for approximately 70 percent of the cost of goods sold (“COGS”), with prices for the primary raw materials, hot-rolled steel and zinc (for galvanized products), declining from 2013 to 2015, but returning to early 2013 levels in 2016.¹⁸⁰

¹⁷⁵ CR/PR at Table I-13. Cumulated subject imports market share by quantity was 5.0 percent in 2016, 7.3 percent in 2017, 7.4 percent in 2018, 8.1 percent in 2019, 8.6 percent in 2020, and 10.3 percent in 2021; it was 9.2 percent in interim 2021 and 11.3 percent in interim 2022. *Id.*

¹⁷⁶ CR/PR at II-7. One of 7 U.S. producers, 3 of 13 importers, and 10 of 30 purchasers reported experiencing supply constraints since January 1, 2016. *Id.*

¹⁷⁷ CR/PR at II-7.

¹⁷⁸ CR/PR at II-7.

¹⁷⁹ Original Determinations, USITC Pub. 4651 at 25.

¹⁸⁰ Original Determinations, USITC Pub. 4651 at 25.

Based on the record in these reviews, we find a moderate-to-high degree of substitutability between domestically produced CWP and cumulated subject imports.¹⁸¹ All domestic producers and a plurality of purchasers rated CWP as always interchangeable for each country comparison; half of responding importers rated domestically produced CWP as always interchangeable with CWP from Oman and Pakistan, while a majority rated domestically produced CWP and CWP from the UAE as frequently and always interchangeable.¹⁸² Most purchasers indicated that domestically produced CWP and subject imports from Oman and the UAE were comparable for most purchasing factors, although most purchasers rated the domestic like product as superior to CWP from Pakistan on most factors.¹⁸³ While most U.S. producers reported that differences other than price were never significant when comparing the domestic like product to subject imports from Oman, Pakistan, and the UAE,¹⁸⁴ importer and purchaser responses were more mixed.¹⁸⁵ Half of responding importers rated differences other than price as sometimes significant when comparing the domestic like product to subject imports from Oman and Pakistan and three importers each rated differences other than price as always and sometimes significant when comparing the domestic like product to subject imports from the UAE.¹⁸⁶ Among purchasers, a plurality reported that differences other than

¹⁸¹ CR/PR at II-13.

¹⁸² CR/PR at Tables II-13 to II-15.

¹⁸³ See CR/PR at Table II-12.

¹⁸⁴ CR/PR at Table II-16.

¹⁸⁵ CR/PR at II-27.

¹⁸⁶ CR/PR at Table II-17.

price were always significant when comparing the domestic like product to subject imports from Oman, Pakistan, and the UAE.¹⁸⁷

We also find that price is an important factor in purchasing decisions. Responding purchasers most frequently cited price, quality, and availability as among the top three factors influencing their purchasing decisions.¹⁸⁸ Price was most frequently reported as the first-, second-, and third-most important factor (cited by 12, 9, and 8 firms, respectively).¹⁸⁹

Responding purchasers most frequently reported price and product consistency (28 firms each), availability and quality meets industry standards (26 firms each), reliability of supply (25 firms), delivery time (19 firms), and delivery terms and grade of steel (15 firms each) as very important to their purchasing decisions.¹⁹⁰ The majority of purchasers also reported that they usually purchase the lowest priced product.¹⁹¹

The primary raw material input used in the production of CWP is hot-rolled steel, although zinc is also used in some applications, such as galvanizing.¹⁹² U.S. producers' raw material costs accounted for at least three-quarters of their total COGS and, as a share of total COGS, they fluctuated over the POR ending at roughly the same level in 2021 as in 2016, and *** percentage points higher in interim 2022 than in interim 2021.¹⁹³ On a per-short ton basis, U.S. producers' raw material costs increased irregularly from \$*** per short ton in 2016 to \$***

¹⁸⁷ CR/PR at Table II-18. Two purchasers cited the superior lead time and availability of domestic producers as important non-price factors. CR/PR at II-29.

¹⁸⁸ CR/PR at II-15.

¹⁸⁹ CR/PR at Table II-8.

¹⁹⁰ CR/PR at Table II-9.

¹⁹¹ CR/PR at II-16. Fifteen of 29 firms reported that they usually purchase the lowest priced product, while five firms reported always doing so. *Id.*

¹⁹² CR/PR at V-1.

¹⁹³ See CR/PR at Table III-9.

in 2021; they were higher in interim 2022 at \$*** per short ton than in interim 2021 at \$*** per short ton.¹⁹⁴ Rising raw material costs during the POR reflected increasing prices for hot-rolled coil and zinc, which increased by 180.4 percent and 138.7 percent, respectively, in June 2022 compared to January 2016.¹⁹⁵ Most of the increase occurred between August 2020 and September 2021 for hot-rolled coil (which increased by 312 percent during this time) and between April 2020 and April 2022 for zinc (which increased by 129 percent during this time).¹⁹⁶ Prices decreased for both hot-rolled coil and zinc after their peaks in September 2021 and April 2022, respectively.¹⁹⁷ Domestic producers, U.S. importers, and purchasers reported either fluctuating or increasing raw material prices since January 1, 2016, with firms generally indicating that the increase in hot-rolled coil prices contributed to the rise in CWP prices.¹⁹⁸ Most U.S. producers and importers also reported that they expect raw material prices to fluctuate in the future, with some expecting no change or that prices will continue to increase.¹⁹⁹ Foreign producers reported that they expect raw material prices to either decrease or fluctuate.²⁰⁰

In these reviews, domestic producers and importers of CWP from Oman and the UAE sold primarily to distributors during the POR, with importers of product from the UAE reporting irregularly increasing shares being sold to end users.²⁰¹ U.S. producers and importers also

¹⁹⁴ CR/PR at Table III-9.

¹⁹⁵ CR/PR at V-1, Fig. V-1.

¹⁹⁶ CR/PR at V-1, Fig. V-1.

¹⁹⁷ CR/PR at V-1, Fig. V-1.

¹⁹⁸ See CR/PR at V-2, Table V-1.

¹⁹⁹ See CR/PR at Table V-2.

²⁰⁰ See CR/PR at Table V-2.

²⁰¹ See CR/PR at Table II-2. Between *** percent and *** percent of U.S. producers' U.S. shipments were sold to distributors during the POR, while between *** and *** percent were sold to (Continued...)

reported selling a large majority of their commercial U.S. shipments of CWP in 2021 in the spot market.²⁰² Most purchasers (19 of 30 firms) reported that they were familiar with raw material prices, while most (18 of 27 firms) reported that the information on raw materials did not affect their negotiations or contracts.²⁰³

Effective March 23, 2018, CWP from Oman, Pakistan, and the UAE became subject to 25 percent *ad valorem* duties under Section 232 and remain subject to these duties.²⁰⁴ Most U.S. producers, importers, and purchasers reported that the Section 232 duties affected the U.S. market for CWP.²⁰⁵ Among the firms elaborating on the impact of the section 232 measures, most reported that cost, price, domestic supply, and demand for domestic product all increased.²⁰⁶

C. Likely Volume of Subject Imports

Original Investigations. In its final determinations, the Commission found that the volume and increase in volume of cumulated subject imports were significant, both in absolute terms and relative to consumption.²⁰⁷ The volume of cumulated subject imports rose from ***

(...Continued)

end users. *Id.* Between *** percent and *** percent of U.S. importer's U.S. shipments of subject imports were sold to distributors during the POR, while between *** percent and *** percent were sold to end users. *Id.*

²⁰² See CR/PR at Table V-4. U.S. producers reported selling *** of their commercial U.S. shipments of CWP in 2021 in the spot market, with the remainder sold through short-term contracts (*** percent) and ***. *Id.* Importers reported selling *** percent of their commercial U.S. shipments of CWP in the spot market with the remainder sold through short-term contracts (*** percent). *Id.*

²⁰³ CR/PR at V-3.

²⁰⁴ CR/PR at I-23.

²⁰⁵ CR/PR at Table II-1.

²⁰⁶ CR/PR at II-1.

²⁰⁷ Original Determinations, USITC Pub. 4651 at 26.

short tons in 2013 to *** short tons in 2014 and *** short tons in 2015.²⁰⁸ The Commission found that the increase in the market share of cumulated subject imports came entirely at the expense of the domestic industry.²⁰⁹ Cumulated subject imports increased their share of apparent U.S. consumption from *** percent in 2013 to *** percent in 2014 and *** percent in 2015.²¹⁰

Current Reviews. Cumulated subject imports maintained a slightly smaller presence in the U.S. market throughout the POR, as compared to their peak in 2015, but increased overall from 2016 to 2021 and each year from 2018 to 2021.²¹¹ Cumulated subject import volumes were 88,029 short tons in 2016, 154,371 short tons in 2017, 139,208 short tons in 2018, 142,183 short tons in 2019, 142,491 short tons in 2020, and 173,057 short tons in 2021; they

²⁰⁸ Confidential Original Determinations, EDIS Doc. 597917, at 36.

²⁰⁹ Original Determinations, USITC Pub. 4651 at 26. The Commission acknowledged that the volume and market share of cumulated subject imports were lower in interim 2016 than in interim 2015; nevertheless, it pointed out that the market share of cumulated subject imports in 2016 was still higher – and that of the domestic industry still lower – than at the beginning of the POI. *Id.*

²¹⁰ Confidential Original Determinations, EDIS Doc. 597917, at 36.

²¹¹ Universal Respondents argue that Commerce’s pending anticircumvention inquiry on CWP from India could substantially change the volume of subject imports observed in these reviews and suggest that the Commission wait to make a determination on this case until Commerce reaches its final decision on that inquiry. *See* Universal Respondents’ Prehearing Br. at 6-8; Universal Respondents’ Resp. to Commission Questions at 16-18; *see also* CR/PR at I-16 n.24. We decline to do so. When Commerce may reach a final decision in its anticircumvention inquiry is unknown, and there is no indication that a corresponding change in the scope of imports determined by Commerce to be subject to these reviews is pending. The Commission must consider the scope of imports already determined by Commerce to be subject to these reviews and not a pending possible change to that scope. *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); *see also* 19 U.S.C. 1677(35)(C)(iv); SAA at 851. If Commerce makes a final affirmative determination in its anticircumvention inquiry and changes the scope of the imports subject to the orders under review, a party may request that the Commission conduct a changed circumstances review under section 751(b) of the Tariff Act (19 U.S.C. § 1675(b)) if it establishes that such a review is warranted.

were 78,439 short tons in interim 2021 and 107,958 short tons in interim 2022.²¹² Cumulated subject import market share increased each year of the POR from 5.0 percent of apparent U.S. consumption in 2016 to 7.3 percent in 2017, 7.4 percent in 2018, 8.1 percent in 2019, 8.6 percent in 2020, and 10.3 percent in 2021; it was 9.2 percent in interim 2021 and 11.3 percent in interim 2022.²¹³

The subject industries have the ability to export significant volumes of subject merchandise to the United States in the event of revocation of the orders.²¹⁴ They have significant combined production capacity that increased from 2016 to 2021 and represented 61.4 percent of apparent U.S. consumption in 2021.²¹⁵ Producers of subject merchandise have significant unused capacity, which increased irregularly from 2016 to 2021, and is estimated to be equivalent to 29.8 percent of apparent U.S. consumption in 2021.²¹⁶ The reporting foreign

²¹² CR/PR at Table IV-1.

²¹³ CR/PR at Table I-13.

²¹⁴ The Commission received no information from members of the CWP industry in Pakistan. However, as previously discussed, publicly available information and information provided by the parties and in the original investigations indicate that the CWP industry in Pakistan has the ability to export significant volumes of subject merchandise to the United States in the event of revocation of the orders, is export oriented, and the U.S. remains an attractive export market for CWP producers in Pakistan.

²¹⁵ *Calculated from* CR/PR at Tables IV-25 and I-13. The subject industries combined production capacity increased from 771,873 short tons in 2016 to 834,816 short tons in 2017, 887,726 short tons in 2018, 923,643 short tons in 2019, 1.0 million short tons in 2020 and 2021; it was 400,093 short tons in interim 2021 and 382,456 short tons in interim 2022. CR/PR at Table IV-25. Apparent U.S. consumption was 1.7 million short tons in 2021. CR/PR at Table I-13.

²¹⁶ *Calculated from* CR/PR Tables IV-25 and I-13. Producers of subject merchandise produced 497,831 short tons of CWP in 2016, 590,179 short tons in 2017, 559,384 short tons in 2018, 569,801 short tons in 2019, 520,290 short tons in 2020, and 529,393 short tons in 2021; they produced 278,653 short tons in interim 2021 and 264,437 short tons in interim 2022. CR/PR at Table IV-25. They had a combined capacity utilization rate of 64.5 percent in 2016, 70.7 percent in 2017, 63.0 percent in 2018, 61.7 percent in 2019, 50.5 percent in 2020, and 51.4 percent in 2021; it was 69.6 percent in interim 2021 and 69.1 percent in interim 2022. *Id.* Producers of subject merchandise in Oman and the UAE also reported being able to shift production of out-of-scope merchandise to CWP (with *** percent of the Oman producer's overall production attributable to CWP in 2021 and *** percent of UAE producers' overall production attributable to CWP in 2021).

producers maintain substantial end-of-period inventories²¹⁷ and are export oriented, as their share of export shipments compared to total shipments increased each year of the POR from 59.2 percent to 72.5 percent.²¹⁸

The U.S. remains an attractive export market for CWP producers in the subject countries, providing them with the incentive to export significant volumes of subject merchandise to the United States upon revocation of the orders.²¹⁹ The reporting foreign producers have directed between 17.1 percent and 32.0 percent of their total exports to the

²¹⁷ Total end-of-period inventories of responding producers in the subject countries increased overall during 2016 to 2021. They were *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021; they were *** short tons in interim 2021 and *** short tons in interim 2022. CR/PR at Table IV-25. Reporting foreign producers' inventories for 2021 were equivalent to *** percent of apparent U.S. consumption in 2021. *Calculated from* CR/PR at Tables IV-25 and I-13.

U.S. importers' inventories of subject merchandise increased overall from 2016 to 2021. They were *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021. CR/PR at Table IV-9. The reported volume of arranged imports for 2022 also reflects continuing interest in the U.S. market by CWP producers in the subject countries. Arranged subject imports for 2022 totaled *** short tons. CR/PR at Table IV-10.

²¹⁸ Exports accounted for 59.2 percent of reporting foreign producers' total shipments in 2016, 63.9 percent in 2017, 66.8 percent in 2018, 68.4 percent in 2019, 70.2 percent in 2020, and 72.5 percent in 2021; they accounted for 74.3 percent of total shipments in interim 2021 and 60.0 percent in interim 2022. CR/PR at Table IV-25.

²¹⁹ Universal Respondents argue that, since imposition of the order of CWP from the UAE, the market demand for CWP from the UAE has increased both in the UAE and in other markets, in particular in the Gulf Cooperation Council ("GCC") countries. Universal Respondents' Substantive Resp. at 4; Universal Respondents' Resp. to Commission Questions at 10. The evidence does not support their argument. The share of the UAE industry's home market shipments on an annual basis steadily declined throughout the POR (from *** percent in 2016 to *** percent in 2021), while the share of export shipments steadily increased (from *** percent in 2016 to *** percent in 2021), see CR/PR at Table IV-21, which is inconsistent with Universal Respondents' claim of increased demand in the home market during the later years of the POR. Furthermore, the share of the UAE's total exports consisting of exports to the United States also increased during this period (from *** percent in 2016 to *** percent in 2021), see CR/PR at Table IV-22, reflecting that any increase in exports to other markets has not detracted from its exports to the U.S. market.

United States during the POR.²²⁰ As previously discussed, the United States was the largest export market for CWP produced in Oman and the UAE throughout the POR, and was the largest export market for CWP produced in Pakistan in 2015, prior to the order on CWP from Pakistan. By 2021, the AUV of the combined subject industry's exports to the United States exceeded the AUV of its exports to the European Union and Asian markets.²²¹ Producers from all three subject sources face import restrictions on its exports of CWP in Canada.²²²

Accordingly, based on the foregoing, including the continued presence of cumulated subject imports in the U.S. market during the POR, the relative attractiveness of the U.S. market, and subject countries' substantial production capacity, increasing unused capacity, substantial inventories, and increasing export orientation, we find that the likely volume of cumulated subject imports would be significant in the event of revocation of the orders.

D. Likely Price Effects of Subject Imports

Original Investigations. The Commission found that cumulated subject imports were moderately substitutable for the domestic like product and that price was an important factor in purchasing decisions.²²³ It found predominant underselling of the domestic like product by cumulated subject imports at high margins, with prices of those imports below those of the domestic like product in 101 of 134 quarterly comparisons (or 75.4 percent); on a volume basis, 166,888 short tons of cumulated subject imports were involved in underselling comparisons (or

²²⁰ Exports to the United States accounted for 17.1 percent of foreign producers' total shipments in 2016, 26.8 percent in 2017, 21.5 percent in 2018, 23.7 percent in 2019, 23.0 percent in 2020, and 32.0 percent in 2021; they accounted for 35.3 percent of total shipments in interim 2021 and 33.8 percent in interim 2022. CR/PR at Table IV-26.

²²¹ See CR/PR at Table IV-26.

²²² See CR/PR at IV-61-62.

²²³ Original Determinations, USITC Pub. 4651 at 25.

96.0 percent), while 6,959 short tons were involved in overselling comparisons. The Commission found that this underselling caused sales to shift from the domestic industry to cumulated subject imports, resulting in the 2013 to 2015 market share gain by subject imports.²²⁴

The Commission stated that prices for domestic CWP showed declines for all pricing products except Product 4.²²⁵ It found, however, that the observed price declines reflected the substantial drop in raw material costs; thus, it was unable to find that cumulated subject imports depressed prices of the domestic like product to a significant degree.²²⁶

The Commission also did not find that cumulated subject imports prevented price increases that would have otherwise occurred to a significant degree, in light of the domestic industry's improving ratio of COGS-to-net sales over the POI.²²⁷ It concluded that there was significant underselling of the domestic like product by cumulated subject imports, which had the effect of increasing the market share of cumulated subject imports at the expense of the domestic industry.²²⁸

Current Reviews. As discussed in section IV.B.3, the record in these reviews indicates that there is a moderate-to-high degree of substitutability between domestically produced CWP and CWP imported from subject sources, and that price is an important factor in purchasing decisions.

²²⁴ Original Determinations, USITC Pub. 4651 at 26-27.

²²⁵ Original Determinations, USITC Pub. 4651 at 28.

²²⁶ Original Determinations, USITC Pub. 4651 at 28.

²²⁷ Original Determinations, USITC Pub. 4651 at 28.

²²⁸ Original Determinations, USITC Pub. 4651 at 28.

The Commission collected quarterly pricing data on four pricing products.²²⁹ Five U.S. producers and six importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.²³⁰

These pricing data indicate that cumulated subject imports undersold the domestic like product in 100 of 107 quarterly comparisons, or 93.5 percent, at underselling margins that ranged from 0.9 percent to 66.6 percent and averaged 38.2 percent.²³¹ By volume, 308,958 short tons of subject imports were in quarters with underselling, which equates to 99.8 percent of the total subject import volume (309,721 short tons) reported in the pricing data.²³² Thus, notwithstanding the discipline of the orders, cumulated subject imports undersold the

²²⁹ The pricing products were the same as in the original investigations, except for the addition of standard specifications to product 4:

Product 1 – ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 2 – 4 inches inclusive;

Product 2 – ASTM A53 schedule 40 galvanized plain-end, with nominal outside diameter of 2 – 4 inches inclusive;

Product 3 – ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 6 – 8 inches inclusive;

Product 4 – ASTM A53 and/or F1083 schedule 40 galvanized fence tube, with nominal outside diameter of 1-1/4 – 3 inches, inclusive.

CR/PR at V-6.

²³⁰ CR/PR at V-6-7. Reported pricing data represented approximately 12.3 percent of U.S. producers' U.S. commercial shipments of CWP in 2021, 0.0 percent of importers' U.S. shipments of subject imports from Oman, and 70.6 percent of importers' U.S. shipments of subject imports from UAE in 2021. CR/PR at V-7. The reported pricing data for Oman accounted for approximately 0.5 percent of reported U.S. commercial shipments of subject imports from Oman during the entire period for which data were collected, January 2016 through June 2022. CR/PR at V-7 n.7. The Commission received no pricing data for subject imports from Pakistan. See CR/PR at V-7.

²³¹ CR/PR at Table V-10.

²³² CR/PR at Table V-10. A plurality of purchasers reported that domestic CWP was now relatively higher in price than CWP from Oman and the UAE. CR/PR at V-17.

domestic like product in nearly all comparisons and volume of subject imports reported for pricing product comparisons during the POR.²³³

Domestic prices for CWP fluctuated from 2016 to 2020 until increasing sharply in 2021.²³⁴ Domestic price increases ranged from *** percent (for product ***) to *** percent (for product ***) between the first quarter of 2016 and the second quarter of 2022.²³⁵ Prices for CWP generally tracked the price for hot-rolled coil during the POR, which increased 180.4 percent between January 2016 and June 2022.²³⁶ The domestic industry's COGS-to-net sales ratio increased irregularly over the POR from *** percent in 2016 to *** percent in 2021; it was higher in interim 2021 at *** percent than in interim 2020 at *** percent.²³⁷ Apparent U.S. consumption decreased irregularly by 5.5 percent from 2016 to 2021, and was 12.1 percent higher in interim 2022 than in interim 2021.²³⁸

²³³ In these reviews, the Commission received no pricing data for subject imports from Pakistan and limited data with respect to subject imports from Oman. However, we observe that, in the original investigations, subject imports from Oman were priced lower than the domestic like product in 38 of 45 comparisons, or 84.4 percent (and by volume *** out of *** short tons or *** percent), with underselling margin ranging from *** to *** percent and subject imports from Pakistan were priced lower than the domestic like product in 22 of 33 comparisons, or 66.6 percent (and by volume *** out of *** short tons or *** percent), with underselling margins ranging from *** to *** percent. Confidential Original Report, EDIS Doc. 599465, at Table V-8.

²³⁴ CR/PR at Fig. V-6

²³⁵ See CR/PR at Table V-9.

²³⁶ Compare CR/PR at Figs. V-1 and V.6. See also V-2 (Firms generally indicated that the increase in hot-rolled coil prices contributed to the rise in CWP prices). Most U.S. producers and importers also reported that they expect raw material prices to fluctuate in the future, with some expecting no change or that prices will continue to increase. CR/PR at V-2. Foreign producers reported that they expect raw material prices to either decrease or fluctuate. See CR/PR at Table V-1.

²³⁷ The domestic industry's COGS-to-net sales ratio was *** percent in 2016, *** percent in 2017 and 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021; it was *** percent in interim 2021 and *** percent in interim 2022. CR/PR at Table III-9.

²³⁸ CR/PR at Tables I-13 and C-1. Most U.S. producers, U.S. importers, and purchasers reported that they anticipate U.S. demand will either fluctuate or not change over the next two years, though several expect demand to increase. CR/PR at Table II-6.

In light of the underselling observed during the original POI and during the review period with the orders in place, the significance of price in purchasing decisions, and the degree of substitutability between the domestic like product and subject imports, we find that significant underselling by cumulated subject imports is likely to continue in the event of revocation of the orders. Additionally, the significant quantities of cumulated subject imports that would likely enter the United States and likely significantly undersell the domestic like product would likely force the domestic industry to lower prices, forego price increases, or risk losing market share.

Thus, we find that the significant volume of low-priced cumulated subject imports would likely have significant price effects in the event of revocation within a reasonably foreseeable time.

E. Likely Impact of Subject Imports

Original Investigations. In its final determinations, the Commission found that cumulated subject imports had a significant impact on the domestic industry.²³⁹ It found that when cumulated subject imports increased their share of the U.S. market from 2013 to 2015, they took market share away from the domestic industry through significant underselling and the domestic industry's output and shipments declined from 2013 to 2015, despite stronger apparent U.S. consumption. As a result of lost market share, the domestic industry's production, shipments, and net sales revenues were lower than they would have been absent subject import competition.²⁴⁰

²³⁹ Original Determinations, USITC Pub. 4651 at 30.

²⁴⁰ Original Determinations, USITC Pub. 4651 at 30-31.

Current Reviews. The domestic industry's trade indicators generally increased from 2016 to 2021, but were generally lower in interim 2022 compared to interim 2021. The industry's capacity and production fluctuated but increased by 6.6 percent and 6.1 percent, respectively, from 2016 to 2021; capacity was 4.5 percent higher and production was 1.6 percent lower in interim 2022 than in interim 2021.²⁴¹ Capacity utilization also fluctuated, but was largely steady, decreasing overall by 0.3 percentage points during 2016 to 2021; it was 4.2 percentage points lower in interim 2022 than in interim 2021.²⁴² The domestic industry's U.S. shipments increased irregularly over 2016 to 2021 by 7.9 percent; they were 1.8 percent lower in interim 2022 compared to interim 2021.²⁴³ The industry's market share decreased from 2016 to 2017 then steadily increased until 2021, when it decreased again, arriving at a level 7.8 percentage points higher than in 2016; it was 8.2 percentage points lower in interim 2022 than in interim 2021.²⁴⁴ U.S. producers' inventories fluctuated but increased overall during 2016 to

²⁴¹ CR/PR at Tables III-4 and C-1. U.S. producers' production capacity, measured in short tons, was 1.5 million in 2016, 1.6 million in 2017, 1.5 million in 2018, 1.6 million in 2019, 2020, and 2021; it was 793,159 in interim 2021 and 828,788 in interim 2022. CR/PR at Table III-4. Domestic CWP production, measured in short tons, was 1.0 million in 2016 and 2017 and 1.1 million in 2018, 2019, 2020, and 2021; it was 577,061 in interim 2021 and 568,024 in interim 2022. *Id.*

²⁴² CR/PR at Tables III-4 and C-1. Capacity utilization was 67.6 percent in 2016, 65.6 percent in 2017, 68.6 percent in 2018, 71.3 percent in 2019, 68.9 percent in 2020, and 67.3 percent in 2021; it was 72.8 percent in interim 2021 and 68.5 percent in interim 2022. CR/PR at Table III-4.

²⁴³ CR/PR at Tables I-13 and C-1. U.S. producers' U.S. shipments in short tons were 974,885 in 2016, 1.0 million in 2017 and 2018, and 1.1 million in 2019, 2020, and 2021; they were 562,686 in interim 2021 and 552,763 in interim 2022. CR/PR at Table I-13.

²⁴⁴ CR/PR at Tables I-13 and C-1. U.S. producers' U.S. shipments as a share of apparent U.S. consumption were 55.0 percent in 2016, 47.5 percent in 2017, 54.9 percent in 2018, 63.0 percent in 2019, 64.5 percent in 2020, and 62.8 percent in 2021; they were 66.2 percent in interim 2021 and 58.0 percent in interim 2022. CR/PR at Table I-13.

2021 by 44.6 percent; they were 5.7 percent higher in interim 2022 compared to interim 2021.²⁴⁵

The domestic industry's employment-related indicators also generally improved throughout the POR. The number of production-related workers and total hours worked fluctuated but increased by 6.9 percent and 7.1 percent, respectively, overall from 2016 to 2021; they were 6.9 and 2.4 percent higher in interim 2022 compared to interim 2021.²⁴⁶ Total wages paid increased 38.5 percent over 2016 to 2021 and were 8.7 percent higher in interim 2022 than in interim 2021, and hourly wages fluctuated but increased by 29.3 percent from 2016 to 2021 and were 6.2 percent higher in interim 2022 than in interim 2021.²⁴⁷ Productivity fluctuated, but decreased overall by 0.9 percent during 2016 to 2021; it was 3.9 percent lower in interim 2022 than in interim 2021.²⁴⁸

²⁴⁵ CR/PR at Tables III-7 and C-1. U.S. producers' inventories in short tons were 86,200 in 2016, 85,176 in 2017, 133,428 in 2018, 124,995 in 2019, 120,981 in 2020, and 124,658 in 2021; they were 120,934 in interim 2021 and 127,799 in interim 2022. CR/PR at Table III-7. The ratio of U.S. producers' inventories to total shipments was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019 and 2020, and *** percent in 2021; it was *** percent in interim 2021 and *** percent in interim 2022. *Id.*

²⁴⁶ CR/PR at Tables III-8 and C-1. The number of production-related workers was 1,800 in 2016, 1,855 in 2017, 1,893 in 2018, 1,909 in 2019, 1,876 in 2020, and 1,925 in 2021; it was 1,900 in interim 2021 and 2,031 in interim 2022. CR/PR at Table III-8. Total hours worked were 3.8 million in 2016, 4.0 million in 2017, 4.1 million in 2018 and 2019, 4.0 million in 2020, and 4.1 million in 2021; they were 2.0 million in interim 2021 and 2.1 million in interim 2022. CR/PR at Table III-8.

²⁴⁷ CR/PR at Tables III-8 and C-1. Total wages paid were \$120.1 million in 2016, \$124.3 million in 2017, \$143.8 million in 2018, \$145.9 million in 2019, \$160.8 million in 2020, and \$166.3 million in 2021; they were \$78.4 million in interim 2021 and \$85.2 million in interim 2022. CR/PR at Table III-8. Hourly wages were \$31.36 in 2016, \$30.86 in 2017, \$35.24 in 2018, \$35.46 in 2019, \$39.82 in 2020, and \$40.55 in 2021; they were \$38.48 in interim 2021 and \$40.86 in interim 2022. CR/PR at Table III-8.

²⁴⁸ CR/PR at Tables III-8 and C-1. Productivity, measured in short tons per 1,000 hours, was 265.4 in 2016, 256.0 in 2017, 259.7 in 2018, 271.0 in 2019, 269.9 in 2020, and 262.9 in 2021; it was 283.4 in interim 2021 and 272.4 in interim 2022. CR/PR at Table III-8.

The domestic industry's financial indicators generally improved overall from 2016 to 2021, but were more mixed between interim periods. Sales revenues improved from 2016 to 2018 before weakening in 2019 and 2020 and substantially improving in 2021, increasing by 134.4 percent from 2016 to 2021; they were 23.7 percent higher in interim 2022 compared to interim 2021.²⁴⁹ Gross profit,²⁵⁰ operating income,²⁵¹ and net income²⁵² all weakened from 2016 to 2017, improved from 2017 to 2018, weakened again from 2018 to 2019 before improving in 2020 and substantially improving in 2021. They increased by ***, ***, and *** percent overall from 2016 to 2021, respectively; gross profits were *** percent higher in interim 2022 than in interim 2021, and operating income and net income were *** and *** percent lower, respectively.²⁵³ The industry's ratios of operating income and net income to net sales fluctuated but decreased overall during 2016 to 2022, by *** percentage points and *** percentage points, respectively; they were both lower, by *** percentage points and *** percentage points, respectively, in interim 2022 compared to interim 2021.²⁵⁴ The industry's

²⁴⁹ CR/PR at Tables III-9 and C-1. Sales revenues were \$847.9 million in 2016, \$978.0 million in 2017, \$1.2 billion in 2018, \$1.1 billion in 2019, \$1.0 billion in 2020, and \$2.0 billion in 2021; they were \$890.0 million in interim 2021 and \$1.1 billion in interim 2022. CR/PR at Table III-9.

²⁵⁰ Gross profit was \$*** in 2016, \$*** in 2017, \$*** in 2018, \$*** in 2019, \$*** in 2020, and \$*** in 2021; it was \$*** in interim 2021 and \$*** in interim 2022. CR/PR at Table III-9.

²⁵¹ Operating income was \$*** in 2016, \$*** in 2017, \$*** in 2018, \$*** in 2019, \$*** in 2020, and \$*** in 2021; it was \$*** in interim 2021 and \$*** in interim 2022. CR/PR at Table III-9.

²⁵² Net income was \$*** in 2016, \$*** in 2017, \$*** in 2018, \$*** in 2019, \$*** in 2020, and \$*** in 2021; it was \$*** in interim 2021 and \$*** in interim 2022. CR/PR at Table III-9.

²⁵³ CR/PR at Table C-1.

²⁵⁴ CR/PR at Tables III-9 and C-1. The industry's ratio of operating income to net sales was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021; it was *** percent in interim 2021 and *** percent in interim 2022. CR/PR at Table III-9. The industry's ratio of net income to net sales was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021; it was *** percent in interim 2021 and *** percent in interim 2022. *Id.*

return on assets fluctuated but decreased overall from 2016 to 2021.²⁵⁵ The domestic industry capital expenditures fluctuated but increased from 2016 to 2021 by 185.7 percent and were 19.4 percent higher in interim 2022 than interim 2021.²⁵⁶

In assessing the vulnerability of the domestic industry, we observe that the domestic industry's performance generally improved over the full years of the POR, but certain indicators showed declining trends, with capacity utilization and operating and net sales ratios declining overall during the POR and inventories and the ratio of inventories to total shipments increasing overall during the POR. On the basis of the record as a whole, we do not find that the domestic industry is currently vulnerable.²⁵⁷

²⁵⁵ The industry's return on assets was *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021. CR/PR at Table III-16. The industry's total assets were \$*** in 2016, \$*** in 2017, \$*** in 2018, \$*** in 2019 and 2020, and \$*** in 2021. CR/PR at Table III-15.

²⁵⁶ CR/PR at Tables III-13 and C-1. Capital expenditures were \$20.4 million in 2016, \$17.5 million in 2017, \$32.7 million in 2018, \$35.4 million in 2019, \$57.1 million in 2020, and \$58.2 million in 2021; they were \$25.9 million in interim 2021 and \$31.0 million in interim 2022. CR/PR at Table III-13. ***. CR/PR at III-46 n.31.

²⁵⁷ According to Universal Respondent, the domestic industry's improved performance demonstrates that revocation of the antidumping duty orders on CWP from Oman, Pakistan, and the UAE, whether considered on a separate or cumulated basis, would not be likely to have an adverse impact on the domestic industry in a reasonably foreseeable time. Universal Respondents' Substantive Resp. at 3; Universal Respondents' Resp. to Commission Questions at 7. We find, however, that the domestic industry's improved condition is due, at least in part, to the antidumping duty orders under review. The domestic industry generally reported higher trade, employment, and financial indicators during the POR than during the POI in the original investigations, even with the increases in cumulated subject imports during the POR that still were below their peak level in 2015, prior to the orders being imposed. *Compare* Confidential Original Determinations, EDIS Doc. 597917, at 41-43 and CR/PR at Tables I-13, III-4, III-8, III-9 and III-13.

Universal Respondents further contend that, if the orders are revoked, the domestic industry will continue to be protected by the Section 232 duties, which they allege have had a more significant impact than the orders. Universal Respondents' Resp. to Commission Questions at 7. We have already found, however, that the domestic industry's improved condition during the POR is due, at least in part, to the antidumping duty orders under review. Initially, the domestic industry's operating income ratio improved from 3.4 percent in 2015 to *** percent in 2016 and its net income switched from *** to *** after the orders were imposed but prior to the imposition of Section 232 duties. *Compare* Confidential (Continued...)

As discussed above, if the orders were revoked, the volume of cumulated subject imports would likely be significant,²⁵⁸ and underselling would likely be greater without the disciplining effect of the orders. Given the high degree of substitutability between subject imports and the domestic like product and the importance of price to purchasers, the domestic industry would respond either by forgoing sales and ceding market share to subject imports, lowering their prices, or forgoing price increases that would otherwise have occurred. Under these circumstances, the likely significant volume and price effects of the cumulated subject imports would likely have a significant impact on the production, shipments, sales, market share, and revenue of the domestic industry. These declines would likely impact the domestic industry's profitability and employment, its ability to raise capital, and to make and maintain capital investments.

We have also considered the role of factors other than subject imports so as not to attribute likely injury from other factors to the subject imports upon revocation of the orders. Nonsubject imports fluctuated but decreased overall in volume and market share from 2016 to

(...Continued)

Original Determinations, EDIS Doc. 597917, at 43 and CR/PR at Table III-9. Further, while Section 232 duties impose additional duties on imports, these measures operate differently than antidumping and countervailing duty orders, which have distinct restraining effects. *See, e.g., See Hot-Rolled Steel from Australia, Brazil, Japan, Netherlands, Russia, South Korea, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-546 and 731-TA-1291-1297 (Review), and 731-TA-808 (Fourth Review), USITC Pub. 5380 (Nov. 2022) at 92 n.561.

²⁵⁸ As discussed in the cumulation section above, Universal Respondents contend that the antidumping margins have not curtailed imports of CWP from UAE since imposition of the order and thus elimination of the order will not result in an increase in imports. *See Universal Respondents' Substantive Resp.* at 5. However, subject imports from UAE did decline from 2015 to 2016 after the imposition of the order and grew at a slower rate from 2018 to 2021 than they did during the original POI, due at least in part to the disciplining effect of the order. *See CR/PR at Table I-13; Confidential Original Report*, EDIS Doc. 599465, at Tables IV-12 and IV-13.

2021.²⁵⁹ Although nonsubject imports are likely to remain in the U.S. market after revocation, the likely significant volume of subject imports would likely take market share from the domestic industry, given the domestic industry's large share of the U.S. market and the degree of substitutability between subject imports and the domestic like product. We find that the continued presence of nonsubject imports in the U.S. market would not preclude subject imports from taking market share from the domestic industry or forcing the domestic industry to lower prices in order to retain sales.

The record also indicates that future demand for CWP is uncertain. While apparent U.S. consumption decreased overall by 5.5 percent from 2016 to 2021 and was higher by 12.1 percent in interim 2022 than in interim 2021,²⁶⁰ most U.S. producers, U.S. importers, and purchasers reported that they anticipate U.S. demand will either fluctuate or not change over the next two years, though several expect demand to increase.²⁶¹ Moreover, given the likely significant volume and underselling by cumulated subject imports, declining demand would be unlikely to fully explain any decline in prices upon revocation of the orders or explain any loss in market share. In light of these considerations, we find that the likely effects attributable to the

²⁵⁹ CR/PR at Table I-13. Nonsubject import volume decreased from 710,744 short tons in 2016 to 450,364 short tons in 2021, and their share of apparent U.S. consumption decreased from 40.1 percent in 2016 to 26.9 percent in 2021. *Id.*

²⁶⁰ CR/PR at Tables I-13 and C-1. Conversely, demand indicators increased over the review period, although GDP and construction spending were impacted by the COVID-19 pandemic in 2020. CR/PR at II-9.

²⁶¹ CR/PR at Table II-6. The parties disagree as to demand trends in the reasonably foreseeable future. Universal Respondents and Ajmal stated in their substantive responses to the notice of initiation that demand for CWP in the United States is expected to increase. *See* Universal Respondents' Substantive Resp. at 7; Ajmal's Substantive Resp. at 9. Domestic Producers, however, contend that demand for CWP will likely decline as signs of an impending recession are increasingly apparent. *See* Domestic Producers' Prehear. Br. at 31; *see also* Domestic Producers' Posthear. Br. at Answers to Commission Questions in Lieu of Hearing at 3-5.

subject imports would be distinct from any likely effects of changes in demand if the orders were revoked.

In sum, we conclude that, if the antidumping duty orders were revoked, cumulated subject imports from Oman, Pakistan, and the UAE would likely have a significant impact on the domestic industry within a reasonably foreseeable time.

V. Conclusion

For the above reasons, we determine that revocation of the antidumping duty orders on CWP from Oman, Pakistan, and the UAE would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

Part I: Introduction

Background

On November 1, 2021, the U.S. International Trade Commission (“Commission” or “USITC”) gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”),¹ that it had instituted reviews to determine whether revocation of the antidumping duty order on circular welded carbon-quality steel pipe (“CWP”) from Oman, Pakistan, and the United Arab Emirates (“UAE”) would likely lead to the continuation or recurrence of material injury to a domestic industry.² ³ On February 4, 2022, the Commission determined that it would conduct full reviews pursuant to section 751(c)(5) of the Act.⁴ Table I-1 presents information relating to the background and schedule of this proceeding.⁵

¹ 19 U.S.C. 1675(c).

² 86 FR 60289, November 1, 2021. All interested parties were requested to respond to this notice by submitting the information requested by the Commission.

³ In accordance with section 751(c) of the Act, the U.S. Department of Commerce (“Commerce”) published a notice of initiation of five-year reviews of the subject antidumping and countervailing duty orders. 86 FR 60201, November 1, 2021.

⁴ 87 FR 9641, February 22, 2022. The Commission found that the domestic interested party group response and the respondent interested party group response from the UAE to its notice of institution were adequate, and determined to conduct a full review of the order on imports from the UAE. The Commission also found that the respondent interested party group responses from Oman and Pakistan were inadequate but determined to conduct full reviews of the orders on circular welded pipe from those countries in order to promote administrative efficiency in light of its determination to conduct a full review of the order with respect to the UAE.

⁵ The Commission’s notice of institution, notice to conduct full reviews, and scheduling notice are referenced in appendix A and may also be found at the Commission’s web site (internet address www.usitc.gov). Commissioners’ votes on whether to conduct expedited or full reviews may also be found at the web site. Appendix B presents the *Federal Register* notice cancelling the Commission’s hearing.

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

Effective date	Action
December 19, 2016	Commerce's antidumping duty orders on CWP from Oman, Pakistan, and the UAE (81 FR 91906)
November 1, 2021	Commission's institution of five-year reviews (86 FR 60289)
November 1, 2021	Commerce's initiation of five-year reviews (86 FR 60201)
February 4, 2022	Commission's determinations to conduct full five-year reviews (87 FR 9641, February 22, 2022)
February 18, 2022	Commerce's final results of expedited five-year reviews of the antidumping duty orders (87 FR 9315)
June 14, 2022	Commission's scheduling of the reviews (87 FR 36881, June 21, 2022)
October 13, 2022	Originally scheduled date for the Commission's hearing (Canceled per 87 FR 62890, October 17, 2021)
November 29, 2022	Commission's vote
December 16, 2022	Commission's determinations and views

The original investigations

The original investigations resulted from petitions filed by Bull Moose Tube Company, Chesterfield, Missouri; EXLTUBE, N. Kansas City, Missouri; Wheatland Tube, a division of JMC Steel Group,⁶ Chicago, Illinois; and Western Tube and Conduit, Long Beach, California, on October 28, 2015, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized imports of CWP from Pakistan and less-than-fair-value ("LTFV") imports of CWP from Oman, Pakistan, the Philippines, the UAE, and Vietnam. In the preliminary phase of the investigations, the Commission found that imports from the Philippines were negligible, and accordingly terminated the antidumping duty investigation with respect to Philippines, while making affirmative determinations with respect to imports from Oman, Pakistan, the UAE, and Vietnam.⁷ On October 28, 2016, Commerce determined that imports of CWP from Oman, Pakistan, the UAE, and Vietnam were being sold at LTFV and that imports of CWP from Pakistan were subsidized.⁸ The Commission determined on December 12, 2016 that the domestic industry was materially injured by reason of imports

⁶ On June 6, 2016, JMC Steel Group changed its corporate name to Zekelman Industries. JMC Steel Group Changes Name to Zekelman Industries Inc. at <https://www.zekelman.com/zekelman-perspective/jmc-steel-group-changes-name-to-zekelman-industries-inc/#:~:text=CHICAGO%2C%20Ill.,Tube%2C%20Picoma%20and%20Energetex%20Tube>, retrieved November 19, 2021.

⁷ Circular Welded Carbon-Quality Steel Pipe from Oman, Pakistan, the Philippines, the United Arab Emirates, and Vietnam, Inv. Nos. 701-TA-549 and 731-TA-1299-1303 (Preliminary), USITC Publication 4586, December 2015, p. 1.

⁸ 81 FR 75026, 81 FR 75028, 81 FR 75030, 81 FR 75042, and 81 FR 75045 October 28, 2016.

of CWP from Oman, Pakistan, and the UAE that were found by Commerce to be sold at LTFV.⁹ It further determined that imports of CWP from Vietnam found by Commerce to be sold at LTFV were negligible, and that imports of CWP from Pakistan subsidized by the government of Pakistan were negligible, and accordingly terminated the antidumping duty investigation with respect to imports from Vietnam and the countervailing duty investigation with respect to imports from Pakistan.¹⁰ On December 19, 2016, Commerce issued its antidumping duty orders.¹¹

Previous and related investigations

The Commission has conducted a number of previous import relief investigations on CWP. Table I-2 presents data on previous and related title VII investigations.

In December 2012, the Commission determined that an industry in the United States was not materially injured or threatened with material injury by reason of imports of CWP from India, Oman, the UAE, and Vietnam found by Commerce to be subsidized and/or sold at LTFV.¹² After a challenge by the petitioners in those investigations to the Commission's determinations, in October 2014, the U.S. Court of International Trade ("CIT") affirmed in part and remanded in part the Commission's negative determinations in those investigations.¹³ In February 2015, the

⁹ 81 FR 91199, December 16, 2016. Commissioners Broadbent, Kieff, and Pinkert dissented with respect to imports from Pakistan, finding that an industry was not materially injured or threatened with material injury by reason of imports from Pakistan found by Commerce to be sold at LTFV. Circular Welded Carbon-Quality Steel Pipe from Oman, Pakistan, the United Arab Emirates, and Vietnam, Inv. Nos. 701-TA-549 and 731-TA-1299, 1300, 1302, and 1303 (Final), USITC Publication 4651, December 2016 ("Original publication"), p. 3 n.1.

¹⁰ Original publication, p. 1.

¹¹ 81 FR 91906, December 19, 2016.

¹² Commerce made a negative final determination in its countervailing duty investigation with respect to imports from Vietnam, and the Commission accordingly terminated its countervailing duty investigation with respect to Vietnam. Circular Welded Carbon-Quality Steel Pipe from India, Oman, the United Arab Emirates, and Vietnam, Inv. Nos. 701-TA-482-484 and 731-TA-1191-1194 (Final), USITC Publication 4362, December 2012, p.1. Commissioners Pinkert and Williamson dissented, reaching affirmative determinations. *Id.*

¹³ *JMC Steel Group v. United States*, Slip Op. 14-120 (Ct. Int'l Trade Oct. 15, 2014).

Commission issued a remand determination, again determining that an industry in the United States was not materially injured or threatened with material injury by reason of imports of CWP from India, Oman, the UAE, and Vietnam sold at LTFV and subsidized by the governments of India, Oman, and the UAE.¹⁴ In May 2015, the CIT issued an order sustaining the Commission's remand determination.¹⁵

¹⁴ Circular Welded Carbon-Quality Steel Pipe from India, Oman, the United Arab Emirates, and Vietnam, Inv. Nos. 701-TA-482-484 and 731-TA-1191-1194 (Final) (Remand), USITC Publication 4521, February 2015, p.1. Commissioners Pinkert and Williamson again dissented and reached affirmative determinations. *Id.*

¹⁵ *JMC Steel Group v. United States*, Slip Op. 15-51 (Ct. Int'l Trade May 29, 2015).

Table I-2
CWP: Previous and related Commission proceedings and status of orders

Date	Number	Country	Determination	Current status of order
1982	701-TA-165	Brazil	Terminated	N/A
1982	701-TA-166	France	Terminated	N/A
1982	701-TA-167	Italy	Negative (P)	N/A
1982	701-TA-168	Korea	Affirmative	Order revoked by Commerce - 1985
1982	701-TA-169	West Germany	Terminated	N/A
1983	731-TA-132	Taiwan	Affirmative	Order continued after fourth five-year review, February 7, 2018
1984	701-TA-220	Spain	Terminated	N/A
1984	731-TA-183	Brazil	Terminated	N/A
1984	731-TA-197	Brazil	Terminated	N/A
1984	731-TA-198	Spain	Terminated	N/A
1985	701-TA-242	Venezuela	Terminated	N/A
1985	701-TA-251	India	ITA Negative	N/A
1985	701-TA-252	Taiwan	ITA Negative	N/A
1985	701-TA-253	Turkey	Affirmative	Order continued after fourth five-year review, February 7, 2018
1985	731-TA-211	Taiwan	Negative	N/A
1985	731-TA-212	Venezuela	Terminated	N/A
1985	731-TA-252	Thailand	Affirmative	Order continued after fourth five-year review, February 7, 2018
1985	731-TA-253	Venezuela	Terminated	N/A
1985	731-TA-271	India	Affirmative	Order continued after fourth five-year review, February 7, 2018

Table continued.

Table I-2 Continued

CWP: Previous and related Commission proceedings and status of orders

Date	Number	Country	Determination	Current status of order
1985	731-TA-273	Turkey	Affirmative	Order continued after fourth five-year review, February 7, 2018
1985	731-TA-274	Yugoslavia	Terminated	N/A
1986	731-TA-292	China	Negative	N/A
1986	731-TA-293	Philippines	Negative	N/A
1986	731-TA-294	Singapore	Negative	N/A
1991	701-TA-311	Brazil	ITA Negative	N/A
1991	731-TA-532	Brazil	Affirmative	Order continued after fourth five-year review, February 7, 2018
1991	731-TA-533	Korea	Affirmative	Order continued after fourth five-year review, February 7, 2018
1991	731-TA-534	Mexico	Affirmative	Order continued after fourth five-year review, February 7, 2018
1991	731-TA-535	Romania	Negative	N/A
1991	731-TA-536	Taiwan	Affirmative	Order continued after fourth five-year review, February 7, 2018
1991	731-TA-537	Venezuela	Affirmative	ITC negative, 2000 review
1995	731-TA-732	Romania	Negative	N/A
1995	731-TA-733	South Africa	Negative	N/A
2001	731-TA-943	China	Negative	N/A
2001	731-TA-944	Indonesia	Negative (P)	N/A
2001	731-TA-945	Malaysia	Negative (P)	N/A
2001	731-TA-946	Romania	Negative (P)	N/A
2001	731-TA-947	South Africa	Negative (P)	N/A

Table continued.

Table I-2 Continued**CWP: Previous and related Commission proceedings and status of orders**

Date	Number	Country	Determination	Current status of order
2007	701-TA-447	China	Affirmative	Order continued after second five-year review, June 26, 2019
2007	731-TA-1116	China	Affirmative	Order continued after second five-year review, June 26, 2019
2011	701-TA-482	India	Negative	N/A
2011	701-TA-483	Oman	Negative	N/A
2011	701-TA-484	UAE	Negative	N/A
2011	731-TA-1191	India	Negative	N/A
2011	731-TA-1192	Oman	Negative	N/A
2011	731-TA-1193	UAE	Negative	N/A
2011	731-TA-1194	Vietnam	Negative	N/A
2015	731-TA-1301	Philippines	Negative (P)	N/A
2015	701-TA-549	Pakistan	Negative	N/A
2015	731-TA-1303	Vietnam	Negative	N/A

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

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

Safeguard investigations

Over the past several decades various safeguard investigations undertaken by the Commission have involved CWP and other related products. In 1984 the Commission conducted an investigation under section 201 of the Trade Act of 1974 regarding imports of a wide range of carbon and certain alloy steel products. The Commission made affirmative determinations with respect to 5 of the 9 investigated products, and the Commission majority recommended various relief measures.¹⁶ On September 18, 1984, the President announced that he would not implement the remedies proposed by the Commission, however he recommended the negotiation of voluntary restraint agreements ("VRAs") with trading partners to address unfair surges in imports of steel products.¹⁷ Between October 1, 1984, and March 31, 1992, the United States limited imports into the U.S. market of non-alloy carbon steel products from the European Union and 19 other sources through VRAs.

¹⁶ Carbon and Certain Alloy Steel Products, Inv. No. TA-201-51, USITC Pub. 1553, July 1984.

¹⁷ 49 FR 36813, September 20, 1984 (President's Memorandum).

In 2001, the Commission determined that certain carbon and alloy steel welded tubular products other than OCTG (including CWP as defined in the current proceeding) were being imported into the United States in such increased quantities as to be a substantial cause of serious injury, or threat thereof, to the domestic industry producing such articles, and recommended certain remedy measures to the President.¹⁸ On March 5, 2002, the President announced the implementation of steel safeguard measures. Import relief relating to welded tubular products (other OCTG) consisted of an additional tariff for a period of three years and one day (15 percent ad valorem on imports in the first year, 12 percent in the second year, and 9 percent in the third year).¹⁹ Following receipt of the Commission's mid-term monitoring report in September 2003, the President determined that the effectiveness of the action taken had been impaired by changed circumstances. Therefore, he terminated the U.S. measure with respect to increased tariffs on December 4, 2003.²⁰

In 2005, the Commission conducted a China-specific safeguard investigation on circular welded non-alloy steel pipe (Inv. No. TA-421-6). Following the Commission's affirmative determination of market disruption and remedy recommendations, the President issued a proclamation on December 30, 2005, determining not to impose temporary import relief.²¹

Summary data

Table I-3 presents a summary of data from the original investigations and the current full five-year reviews. Apparent U.S. consumption, by quantity, was 7.6 percent lower in 2021 than in 2015, while by value it was 77.5 percent higher. U.S. producers' market share, by quantity, increased from 52.0 percent in 2015 to 62.8 percent in 2021. The market share of subject imports increased from *** percent in 2015 to 10.3 percent in 2021, while for nonsubject source imports it decreased from *** percent to 26.9 percent during the same

¹⁸ Steel; Import Investigations, 66 FR 67304, December 28, 2001.

¹⁹ Presidential Proclamation 7529 of March 5, 2002, To Facilitate Positive Adjustment to Competition from Imports of Certain Steel Products, 67 FR 10553, March 7, 2002. The President also instructed the Secretaries of Commerce and the Treasury to establish a system of import licensing to facilitate steel import monitoring.

²⁰ *Presidential Proclamation 7741 of December 4, 2003, To Provide for the Termination of Action Taken With Regard to Imports of Certain Steel Products*, 68 FR 68483, December 8, 2003. Import licensing, however, remained in place through March 21, 2005, and continues in modified form at this time.

²¹ Presidential Proclamation 2006-7 of December 30, 2005, Presidential Determination on Imports of Circular Welded Non-Alloy Steel Pipe from the People's Republic of China, 71 FR 871, January 5, 2006.

time period. Overall imports from subject sources, by quantity, were *** percent lower in 2021 than in 2015.

U.S. producers' capacity was 3.1 percent lower in 2021 than in 2015, while production was 10.2 percent higher. U.S. producers' number of production workers was 50.4 percent higher in 2021 than in 2015. U.S. producers reported gross profits of \$108.8 million in 2015 and \$*** in 2021. U.S. producers reported operating incomes of \$31.0 million in 2015 and \$*** in 2021.

Table I-3**CWP: Comparative data from the original investigations and subsequent reviews, by terminal years**

Quantity in short tons; value in 1,000 dollars; unit values in dollars per short ton; shares in percent

Item	Measure	2015	2021
Apparent consumption	Quantity	1,812,903	1,675,499
U.S. producers market share	Share of quantity	52.0	62.8
Oman market share	Share of quantity	***	3.5
Pakistan market share	Share of quantity	***	0.0
UAE market share	Share of quantity	***	6.8
Subject market share	Share of quantity	***	10.3
Nonsubject market share	Share of quantity	***	26.9
Import market share	Share of quantity	48.0	37.2
Apparent consumption	Value	1,621,944	2,879,054
U.S. producers market share	Share of value	53.5	68.8
Oman market share	Share of value	***	2.4
Pakistan market share	Share of value	***	0.0
UAE market share	Share of value	***	4.6
Subject market share	Share of value	***	7.0
Nonsubject market share	Share of value	***	24.3
Import market share	Share of value	46.5	31.2
Oman	Quantity	***	59,018
Oman	Value	***	67,933
Oman	Unit value	***	1,151
Pakistan	Quantity	***	57
Pakistan	Value	***	56
Pakistan	Unit value	***	981
UAE	Quantity	***	113,982
UAE	Value	***	132,809
UAE	Unit value	***	1,165
Subject sources	Quantity	***	173,057
Subject sources	Value	***	200,798
Subject sources	Unit value	***	1,160
Nonsubject sources	Quantity	***	450,364
Nonsubject sources	Value	***	698,216
Nonsubject sources	Unit value	***	1,550
All import sources	Quantity	870,744	623,420
All import sources	Value	754,771	899,014
All import sources	Unit value	867	1,442

Table continued.

Table I-3 Continued**CWP: Comparative data from the original investigation and subsequent reviews, by terminal years**

Quantity in short tons; value in 1,000 dollars; ratios in percent; hourly wages in dollars per hour; production workers as number of workers; productivity in short tons per 1,000 hours; unit values, unit labor costs, and unit expenses in dollars per short ton

Item	Measure	2015	2021
Capacity	Quantity	1,653,998	1,602,677
Production	Quantity	978,804	1,078,306
Capacity utilization	Ratio	59.2	67.3
Producer U.S. shipments	Quantity	942,159	1,052,079
Producer U.S. shipments	Value	867,173	1,980,040
Producer U.S. shipments	Unit value	920	1,882
Producer inventories	Quantity	92,899	124,658
Producer inventory ratio to total shipments	Ratio	9.5	***
Production workers (number)	Noted in label	1,280	1,925
Hours worked (in 1,000 hours)	Noted in label	2,704	4,101
Wages paid (1,000 dollars)	Value	87,301	166,303
Hourly wages (dollars per hour)	Value	\$32.29	\$40.55
Productivity (short tons per hour)	Noted in label	362.0	262.9
Net sales	Quantity	978,300	1,056,900
Net sales	Value	917,769	1,987,661
Net sales	Unit value	938	1,881
Cost of goods sold	Value	808,952	***
Gross profit or (loss)	Value	108,817	***
SG&A expense	Value	77,848	155,721
Operating income or (loss)	Value	30,969	***
Unit COGS	Unit value	827	***
Unit operating income	Unit value	32	***
COGS/Sales	Ratio	88.1	***
Operating income or (loss)/Sales	Ratio	3.4	***

Source: Office of Investigations memorandum INV-OO-102 (November 7, 2016), and from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed August 31, 2022. Imports are based on the imports for consumption data series, and import values are the landed duty paid value.

Table I-4 and figure I-1 present data on U.S. producers' U.S. shipments and U.S. importers' U.S. imports during the original investigations and these full reviews.

Table I-4**CWP: U.S. producers' U.S. shipments and U.S. importers' imports from the original investigations and these reviews, by source and period**

Quantity in short tons

Source	Measure	2013	2014	2015
U.S. producers	Quantity	969,534	951,925	942,159
Subject sources	Quantity	***	***	***
Nonsubject sources	Quantity	***	***	***
All import sources	Quantity	677,042	751,219	870,744
All sources	Quantity	1,646,576	1,703,144	1,812,903

Table continued.

Table I-4 Continued**CWP: U.S. producers' U.S. shipments and U.S. importers' imports from the original investigations and these reviews, by source and period**

Quantity in short tons

Source	Measure	2016	2017	2018
U.S. producers	Quantity	974,885	1,001,532	1,026,549
Subject sources	Quantity	88,029	154,371	139,208
Nonsubject sources	Quantity	710,744	952,937	702,849
All import sources	Quantity	798,773	1,107,308	842,057
All sources	Quantity	1,773,658	2,108,840	1,868,606

Table continued.

Table I-4 Continued**CWP: U.S. producers' U.S. shipments and U.S. importers' imports from the original investigations and these reviews, by source and period**

Quantity in short tons

Source	Measure	2019	2020	2021
U.S. producers	Quantity	1,110,373	1,069,687	1,052,079
Subject sources	Quantity	142,183	142,491	173,057
Nonsubject sources	Quantity	510,997	445,616	450,364
All import sources	Quantity	653,179	588,107	623,420
All sources	Quantity	1,763,552	1,657,794	1,675,499

Source: Office of Investigations memorandum INV-OO-102 (November 7, 2016), and from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed August 31, 2022. Imports are based on the imports for consumption data series, and import values are the landed duty paid value.

Note: Data presented for years 2013-15 are derived from questionnaire responses in the final phase of the original investigations, while data presented for years 2016-21 are derived from U.S. producers' questionnaire responses in these current reviews and from official U.S. import statistics.

Figure I-1
CWP: Apparent U.S. consumption, by source and by period

* * * * *

Source: Office of Investigations memorandum INV-OO-102 (November 7, 2016), and from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed August 31, 2022. Imports are based on the imports for consumption data series, and import values are the landed duty paid value.

Statutory criteria

Section 751(c) of the Act requires Commerce and the Commission to conduct a review no later than five years after the issuance of an antidumping or countervailing duty order or the suspension of an investigation to determine whether revocation of the order or termination of the suspended investigation “would be likely to lead to continuation or recurrence of dumping or a countervailable subsidy (as the case may be) and of material injury.”

Section 752(a) of the Act provides that in making its determination of likelihood of continuation or recurrence of material injury--

(1) IN GENERAL.-- . . . the Commission shall determine whether revocation of an order, or termination of a suspended investigation, would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time. The Commission shall consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the order is revoked or the suspended investigation is terminated. The Commission shall take into account--

(A) its prior injury determinations, including the volume, price effect, and impact of imports of the subject merchandise on the industry before the order was issued or the suspension agreement was accepted,

(B) whether any improvement in the state of the industry is related to the order or the suspension agreement,

(C) whether the industry is vulnerable to material injury if the order is revoked or the suspension agreement is terminated, and

(D) in an antidumping proceeding . . . , (Commerce's findings) regarding duty absorption . . .

(2) VOLUME.--In evaluating the likely volume of imports of the subject merchandise if the order is revoked or the suspended investigation is terminated, the Commission shall consider whether the likely volume of imports of the subject merchandise would be significant if the order is revoked or the suspended investigation is terminated, either in absolute terms or relative to production or consumption in the United States. In so doing, the Commission shall consider all relevant economic factors, including--

(A) any likely increase in production capacity or existing unused production capacity in the exporting country,

(B) existing inventories of the subject merchandise, or likely increases in inventories,

(C) the existence of barriers to the importation of such merchandise into countries other than the United States, and

(D) 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.

(3) PRICE.--In evaluating the likely price effects of imports of the subject merchandise if the order is revoked or the suspended investigation is terminated, the Commission shall consider whether--

(A) there is likely to be significant price underselling by imports of the subject merchandise as compared to domestic like products, and

(B) imports of the subject merchandise are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of domestic like products.

(4) IMPACT ON THE INDUSTRY.--In evaluating the likely impact of imports of the subject merchandise on the industry if the order is revoked or the suspended investigation is terminated, the Commission shall consider all relevant economic factors which are likely to have a bearing on the state of the industry in the United States, including, but not limited to—

(A) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity,

(B) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment, and

(C) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.

The Commission shall evaluate all such relevant economic factors . . . within the context of the business cycle and the conditions of competition that are distinctive to the affected industry.

Section 752(a)(6) of the Act states further that in making its determination, “the Commission may consider the magnitude of the margin of dumping or the magnitude of the net countervailable subsidy. If a countervailable subsidy is involved, the Commission shall consider information regarding the nature of the countervailable subsidy and whether the subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement.”

Organization of report

Information obtained during the course of the reviews that relates to the statutory criteria is presented throughout this report. A summary of trade and financial data for CWP as collected in the reviews is presented in appendix C. U.S. industry data are based on the questionnaire responses of seven U.S. producers of CWP that are believed to account for the majority of domestic production of CWP in 2021. U.S. import data and related information are based on Commerce’s official import statistics²² and the questionnaire responses of fourteen importers of CWP that are believed to have accounted for *** percent of the total subject

²² While 17 HTS statistical reporting numbers are provided in the scope as the numbers under which the subject product is “currently classifiable” (see the section entitled “Tariff Treatment” below), official import statistics presented in this report are based on 7 “primary HTS numbers” which are believed to account for the majority of imports of circular welded pipe: 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090.

U.S. imports during 2021. Foreign industry data and related information are based on the questionnaire responses of seven producers of CWP. Responses were received from one producer believed to account for *** production in Oman in 2021 and six producers in the UAE believed to account for at least seventy percent of total production in that country in 2021.²³ No response was received from any producer in Pakistan. Responses by U.S. producers, importers, purchasers, and foreign producers of CWP to a series of questions concerning the significance of the existing antidumping and countervailing duty orders and the likely effects of revocation of such orders are presented in appendix D.

Commerce's reviews

Administrative reviews²⁴

Commerce has completed three administrative reviews of the outstanding antidumping duty order on CWP from Oman, with an ongoing review covering the period of December 1, 2020 through November 30, 2021. Commerce has completed four administrative reviews of the

²³ These estimates are derived from aggregating the responding foreign producers' estimates of the share of production their firms accounted for in each country. The Commission received no responses to its questionnaire from foreign producers in Pakistan.

²⁴ Commerce has not conducted any administrative reviews, new shipper reviews, changed circumstances reviews, anti-circumvention reviews, or scope rulings since the imposition of the order on imports from Pakistan. With the exception of the referenced administrative reviews for Oman and the UAE, there have been no other completed administrative reviews (including new shipper reviews), scope inquiries, anti-circumvention reviews, changed circumstances reviews, or duty absorption findings in connection with the orders.

There is however an ongoing anti-circumvention review concerning whether imports of certain welded carbon steel standard pipe and tube, which are completed in Oman and the UAE from hot-rolled steel produced in India, are circumventing the antidumping duty order on certain welded carbon steel standard pipe and tube from India (87 FR 9571, February 22, 2022). Commerce has preliminarily determined that such imports from Oman and the UAE are not circumventing the order on pipe and tube from India (87 FR 52507, August 26, 2022), however interested party Universal argues that should Commerce ultimately find that such imports are circumventing the order on pipe and tube from India, then such imports would be subject to the order from India, and not subject to the orders concerning Oman or the UAE, and the Commission will have to consider the effect this would have on volume figures in these reviews accordingly. See Universal's prehearing brief pp. 1-8 and Universal's posthearing brief pp. 16-18. Domestic producers argue however that such an argument "has no legal basis" and that the circumvention proceeding "should not play any role in the Commission's analysis in these reviews." See Domestic Producers' posthearing brief, "Answers to Commission Questions in Lieu Of Hearing", pp. 38-44. The parties note that Commerce's final anti-circumvention determination is due by December 19, 2022, and Commerce may extend its deadline by up to 65 days (i.e., until February 22, 2023), though as of the time of the issuance of this report, it has not yet done so.

outstanding antidumping duty order on CWP from the UAE, with an ongoing review covering the period of December 1, 2020 through November 30, 2021.²⁵

Oman

Commerce has completed three administrative reviews of the outstanding antidumping duty order on CWP from Oman. The results of the administrative reviews are shown in table I-5.

Table I-5
CWP: Administrative reviews of the antidumping duty order for Oman

Date results published	Period of review	Producer or exporter	Margin (percent)
June 25, 2019, 84 FR 29846	June 8, 2016 – November 30, 2017	Al Jazeera Steel Products Co. SAOG	3.84
April 24, 2020, 85 FR 22997	December 1, 2017 – November 30, 2018	Al Jazeera Steel Products Co. SAOG	1.10
April 9, 2021, 86 FR 18513	December 1, 2018 – November 30, 2019	Al Jazeera Steel Products Co. SAOG	1.56

Source: Cited Federal Register notices.

United Arab Emirates

Commerce has completed four administrative reviews of the outstanding antidumping duty order on CWP from the UAE. The results of the administrative reviews are shown in table I-6.

²⁵ For previously reviewed or investigated companies not included in an administrative review, the cash deposit rate continues to be the company-specific rate published for the most recent period.

Table I-6

CWP: Administrative reviews of the antidumping duty order for the UAE

Date results published	Period of review	Producer or exporter	Margin (percent)
October 10, 2019, 84 FR 54587	June 8, 2016 – November 30, 2017	Ajmal Steel Tubes & Pipes Ind. L.L.C./Noble Steel Industries L.L.C	1.83
October 10, 2019, 84 FR 54587	June 8, 2016 – November 30, 2017	Universal Tube and Plastic Industries, Ltd./THL Tube and Pipe Industries LLC/KHK Scaffolding and Formwork LLC	1.65
October 10, 2019, 84 FR 54587	June 8, 2016 – November 30, 2017	Review-Specific Average Rate	1.74
January 5, 2021, 86 FR 289	December 1, 2017 – November 30, 2018	Conares Metal Supply Ltd.	2.49
January 5, 2021, 86 FR 289	December 1, 2017 – November 30, 2018	Universal Tube and Plastic Industries, Ltd./THL Tube and Pipe Industries LLC/KHK Scaffolding and Formwork LLC	3.63
January 5, 2021, 86 FR 289	December 1, 2017 – November 30, 2018	Review-Specific Average Rate	3.06
October 27, 2021, 86 FR 59364	December 1, 2018 – November 30, 2019	Ajmal Steel Tubes & Pipes Ind. L.L.C./Noble Steel Industries L.L.C	54.27
October 27, 2021, 86 FR 59364	December 1, 2018 – November 30, 2019	Universal Tube and Plastic Industries, Ltd./THL Tube and Pipe Industries LLC/KHK Scaffolding and Formwork LLC	1.62
October 27, 2021, 86 FR 59364	December 1, 2018 – November 30, 2019	Conares Metal Supply Limited	1.62
July 11, 2022, 87 FR 41111	December 1, 2019 – November 30, 2020	Ajmal Steel Tubes & Pipes Ind. L.L.C./Noble Steel Industries L.L.C	2.27
July 11, 2022, 87 FR 41111	December 1, 2019 – November 30, 2020	Universal Tube and Plastic Industries, Ltd./THL Tube and Pipe Industries LLC/KHK Scaffolding and Formwork LLC	3.54
July 11, 2022, 87 FR 41111	December 1, 2019 – November 30, 2020	Conares Metal Supply Limited	2.77
July 11, 2022, 87 FR 41111	December 1, 2019 – November 30, 2020	TSI Metal Industries LLC	2.77
July 11, 2022, 87 FR 41111	December 1, 2019 – November 30, 2020	K.D. Industries Inc.	2.77

Source: Cited Federal Register notices.

Note: June 8, 2016 – November 30, 2017 review: Review-specific average rate applicable to the following companies: Abu Dhabi Metal Pipes and Profiles Industries Complex; Ferrolab LLC; Global Steel Industries; Lamprell; Link Middle East Ltd; PSL FZE; and Three Star Metal Ind LLC.

Note: December 1, 2017 – November 30, 2018 review: Review-specific average rate applicable to the following companies: Abu Dhabi Metal Pipes and Profiles Industries Complex; Ajmal Steel Tubes & Pipes Ind. L.L.C./Noble Steel Industries L.L.C; Al Mansoori Industrial Supply; Baker Hughes EHO Ltd; BioAir Solutions LLC; Bridgeway Shipping & Clearing Services, LLC; Ferrofab FTZ; Ferrolab LLC; Global Steel Industries; Halima Pipe Co., Ltd; K.D. Industries Inc; Lamprell; Link Middle East Ltd; Noble Marine Metals Co., W.L.L.; PSL FZE; Reyah Metal Trading FZE; Three Star Metal Ind LLC; and Tiger Steel Industries LLC.

Five-year reviews

Commerce has issued the final results of its expedited reviews with respect to all subject countries.²⁶ Tables I-7 through I-9 present the dumping margins calculated by Commerce in its original investigations and first reviews.

Table I-7

CWP: Commerce’s original and first five-year dumping margins for producers/exporters in Oman

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Al Jazeera Steel Products Co. SAOG	7.36	--
All others	7.36	7.36

Source: 87 FR 9315, February 18, 2022.

Table I-8

CWP: Commerce’s original and first five-year dumping margins for producers/exporters in Pakistan

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
International Industries Limited	11.80	--
All others	11.80	11.80

Source: 87 FR 9315, February 18, 2022.

²⁶ 87 FR 9315.

Table I-9

CWP: Commerce’s original and first five-year dumping margins for producers/exporters in the UAE

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Ajmal Steel Tubes & Pipes Ind. LLC	6.43	--
Universal Tube and Plastic Industries, LLC—Jebel Ali Branch/Universal Tube and Pipe Industries, Ltd./KHK Scaffolding and Framework LLC	5.58	--
All others	5.95	6.43

Source: 87 FR 9315, February 18, 2022.

The subject merchandise

Commerce’s scope

In the current proceeding, Commerce has defined the scope as:²⁷

welded carbon-quality steel pipes and tube, of circular cross-section, with an outside diameter (O.D.) not more than nominal 16 inches (406.4 mm), regardless of wall thickness, surface finish (e.g., black, galvanized, or painted), end finish (plain end, beveled end, grooved, threaded, or threaded and coupled), or industry specification (e.g., American Society for Testing and Materials International (ASTM), proprietary, or other), generally known as standard pipe, fence pipe and tube, sprinkler pipe, and structural pipe (although subject product may also be referred to as mechanical tubing). Specifically, the term “carbon quality” includes products in which:

- (a) iron predominates, by weight, over each of the other contained elements;*
- (b) the carbon content is 2 percent or less, by weight; and*
- (c) none of the elements listed below exceeds the quantity, by weight, as indicated:*

²⁷ Issues and Decision Memorandum for the Final Results of the Expedited Sunset Reviews of the Antidumping Duty Orders on Circular Welded Carbon-Quality Steel Pipe from Oman, Pakistan, and the United Arab Emirates, February 11, 2022.

- (i) 1.80 percent of manganese;*
- (ii) 2.25 percent of silicon;*
- (iii) 1.00 percent of copper;*
- (iv) 0.50 percent of aluminum;*
- (v) 1.25 percent of chromium;*
- (vi) 0.30 percent of cobalt;*
- (vii) 0.40 percent of lead;*
- (viii) 1.25 percent of nickel;*
- (ix) 0.30 percent of tungsten;*
- (x) 0.15 percent of molybdenum;*
- (xi) 0.10 percent of niobium;*
- (xii) 0.41 percent of titanium;*
- (xiii) 0.15 percent of vanadium; or*
- (xiv) 0.15 percent of zirconium.*

Covered products are generally made to standard O.D. and wall thickness combinations. Pipe multi-stenciled to a standard and/or structural specification and to other specifications, such as American Petroleum Institute (API) API-5L specification, may also be covered by the scope of these investigations. In particular, such multi-stenciled merchandise is covered when it meets the physical description set forth above, and also has one or more of the following characteristics: is 32 feet in length or less; is less than 2.0 inches (50 mm) in outside diameter; has a galvanized and/or painted (e.g., polyester coated) surface finish; or has a threaded and/or coupled end finish.

Standard pipe is ordinarily made to ASTM specifications A53, A135, and A795, but can also be made to other specifications. Structural pipe is made primarily to ASTM specifications A252 and A500. Standard and structural pipe may also be produced to proprietary specifications rather than to industry specifications.

Sprinkler pipe is designed for sprinkler fire suppression systems and may be made to industry specifications such as ASTM A53 or to proprietary specifications.

Fence tubing is included in the scope regardless of certification to a specification listed in the exclusions below, and can also be made to the ASTM A513 specification. Products that meet the physical description set forth above but are made to the following nominal outside diameter and wall thickness combinations, which are recognized by the industry as

typical for fence tubing, are included despite being certified to ASTM mechanical tubing specifications:²⁸

O.D. in inches (nominal)	Wall thickness in inches (nominal)	Gage
1.315	0.035	20
1.315	0.047	18
1.315	0.055	17
1.315	0.065	16
1.315	0.072	15
1.315	0.083	14
1.315	0.095	13
1.660	0.055	17
1.660	0.065	16
1.660	0.083	14
1.660	0.095	13
1.660	0.109	12
1.900	0.047	18
1.900	0.055	17
1.900	0.065	16
1.900	0.072	15
1.900	0.095	13
1.900	0.109	12
2.375	0.047	18
2.375	0.055	17
2.375	0.065	16
2.375	0.072	15
2.375	0.095	13
2.375	0.109	12
2.375	0.120	11
2.875	0.109	12
2.875	0.165	8
3.500	0.109	12

²⁸ The scope also specifies that the following products are not included: (a) pipe suitable for use in boilers, superheaters, heat exchangers, refining furnaces and feedwater heaters, whether or not cold drawn, which are defined by standards such as ASTM A178 or ASTM A192; (b) finished electrical conduit, i.e., Electrical Rigid Steel Conduit (also known as Electrical Rigid Metal Conduit and Electrical Rigid Metal Steel Conduit), Finished Electrical Metallic Tubing, and Electrical Intermediate Metal Conduit, which are defined by specifications such as American National Standard (ANSI) C80.1-2005, ANSI C80.3-2005, or ANSI C80.6-2005, and Underwriters Laboratories Inc. (UL) UL-6, UL-797, or UL-1242; (c) finished scaffolding, i.e., component parts of final, finished scaffolding that enter the United States unassembled as a “kit.” A kit is understood to mean a packaged combination of component parts that contains, at the time of importation, all of the necessary component parts to fully assemble final, finished scaffolding; (d) tube and pipe hollows for redrawing; (e) oil country tubular goods produced to API specifications; (f) line pipe produced to only API specifications, such as API 5L, and not multi-stenciled; and (g) mechanical tubing, whether or not cold-drawn, other than what is included in the scope definition.

3.500	0.165	8
4.000	0.148	9
4.000	0.165	8
4.500	0.203	7

Tariff treatment

CWP is currently imported under HTS statistical reporting numbers 7306.19.1010, 7306.19.1050, 7306.19.5110, 7306.19.5150, 7306.30.1000, 7306.30.5015, 7306.30.5020, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, 7306.30.5090, 7306.50.1000, 7306.50.5030, 7306.50.5050, and 7306.50.5070. CWP originating in Oman, Pakistan, and the UAE comes into the U.S. market at a column 1-general duty rate of “Free.”²⁹

Effective April 9, 2022, Congress imposed the column 2 duty rates of 5.5–45 percent *ad valorem* upon CWP originating in either Belarus or Russia (both nonsubject countries).³⁰ CWP produced in China (nonsubject country) is currently subject to an additional 7.5 percent *ad valorem* duty under Section 301 of the Trade Act of 1974.³¹ Effective March 23, 2018, CWP originating in Oman, Pakistan, and the UAE are subject to an additional 25 percent *ad valorem* duty under Section 232 of the Trade Expansion Act of 1962, as amended.³² Nonsubject CWP originating in Australia, Canada, Mexico, and Ukraine are currently exempt from Section 232 duties; imports originating in Argentina, Brazil, and South Korea are currently exempt from Section 232 duties within absolute annual quota limits; imports originating in European Union

²⁹ HTSUS (2022) Basic Revision 8, USITC Publication 5345, July 2022, pp. 73-16 – 73-18, 99-III-263.

³⁰ Suspending Normal Trade Relations with Russia and Belarus Act, P.L. 117-110, April 8, 2022; HTSUS (2022) Basic Revision 8, USITC Publication 5345, July 2022, pp. 73-16 – 73-18.

³¹ The U. S. Trade Representative imposed the tariffs under Section 301 of the Trade Act of 1974 (19 U.S.C. § 2411) after determining that certain acts, policies, and practices of China are unreasonable or discriminatory and burden or restrict U.S. commerce. (82 Fed. Reg. 40213, August 24, 2017; 83 FR 14906, April 6, 2018). Effective September 1, 2019, CWP products originating in China were subject to an additional 15 percent *ad valorem* duty under Section 301 tariffs, but this duty rate was reduced to 7.5 percent, effective on February 14, 2020. HTSUS (2022) Basic Revision 8, Publication 5345, July 2022, pp. 99-III-86-97, and 99-III-293. 84 FR 43304, August 20, 2019; 85 FR 3741, January 22, 2020.

³² Section 232 of the Trade Expansion Act of 1962, as amended (19 U.S.C. §1862), authorizes the President, on advice of the Secretary of Commerce, to adjust the imports of an article and its derivatives that are being imported into the United States in such quantities or under such circumstances as to threaten to impair the national security. *Adjusting Imports of Steel into the United States*, Presidential Proclamation 9705, March 8, 2018, 83 FR 11625, March 15, 2018.

See also HTS heading 9903.80.01 and U.S. notes 16(a), 16(b), and 16(3) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTSUS (2022) Basic Revision 8, Publication 5345, July 2022, pp. 99-III-5-8, and 99-III-263-283.

member countries, Japan, and the United Kingdom are exempt from Section 232 duties subject to tariff rate quotas; and imports from all other countries are subject to 25 percent additional duties.³³ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

The product

Description and uses³⁴

Standard pipe of non-alloy steel is the primary product within the scope of these investigations. Standard pipe is intended for the low-pressure conveyance of water, steam, natural gas, air, and other liquids and gases in plumbing and heating systems, air conditioning units, automatic sprinkler systems, and other related uses. Standard pipe may carry liquids at elevated temperatures but may not be subject to the application of external heat. It is manufactured primarily to meet American Society for Testing and Materials (“ASTM”) A53,³⁵ A135, and A795 specifications, but can also be manufactured to meet other specifications. Since these standards often specify required engineering characteristics that overlap, a standard pipe can also be “dual stenciled” — i.e., stamped with monograms signifying compliance with two different specifications, such as ASTM A53 and American Petroleum Institute (“API”) 5L. CWP is frequently available in different grades. Grades A and B refer to the chemical composition of the steel used to produce the pipe as well as its mechanical properties, as determined by the ASTM specifications. In the case of ASTM A53, Grade B pipe has higher tensile and yield strength than Grade A pipe.³⁶

³³ 83 FR 13361, March 28, 2018; 83 FR 20683, May 7, 2018; 83 FR 25857, June 5, 2018; 83 FR 40429, August 15, 2018; 84 FR 23987, May 23, 2019; 87 FR 11, January 3, 2022; 87 FR 19351, April 1, 2022; 87 FR 33407, June 2, 2022; and 87 FR 33591, June 3, 2022.

³⁴ Original publication, pp. I-18—I-19.

³⁵ ASTM A53 is one of the most widely used material standards for steel pipes used in oil and gas and other process industries. Grade B of ASTM A53 is more popular than other grades. In oil and gas applications, ASTM A53 pipes are used in structural and noncritical applications but not used in hydrocarbon services or any high pressure and temperature services. Domestic interested parties’ posthearing brief, exhibit 1.

³⁶ According to domestic interested parties, in practice, project engineers specify whether a certain grade of pipe is required for a given application. Higher grade pipe with higher physical values (e.g., higher tensile and yield strength) and testing could be substituted for lower grade products but not vice versa and such substitution does occur. This Domestic interested parties’ posthearing brief, answers to commission questions in lieu of hearing, p.2.

In addition, CWP is used for structural applications in general construction. Structural pipe is generally used for structural or load-bearing purposes by the construction industry, as well as for structural members in ships, trailers, farm equipment, and other similar uses. It is manufactured in nominal wall thicknesses and sizes to meet ASTM specifications. These products are manufactured primarily to meet standard ASTM specifications such as A500 or A252 as well as American Society of Mechanical Engineers (“ASME”) specifications.

Other uses of CWP include light load-bearing and mechanical applications, such as for fence tubing, scaffolding components, and protection of electrical wiring (e.g., as conduit shells). Fence tubing is commonly manufactured to meet ASTM specification F1083, which covers hot-dipped galvanized welded steel pipe used for fence structures. However, pipe mills also manufacture fence tubing either without reference to an ASTM specification or reference to a general specification such as ASTM A513.

Standard pipe used in light load-bearing, mechanical, and structural applications may be galvanized (zinc-coated by dipping in molten zinc), lacquered (black finish), or painted “black” to provide corrosion resistance, which is important for storage in humid conditions or for ocean transport. End finishes include plain end, which may be either cut, or beveled suitable for welding, or include threaded ends, or threaded or coupled, as well as other special end finishes. Pipe with threaded ends is usually provided “threaded and coupled,” meaning that a coupling is attached to one end of each length of pipe.

Manufacturing process³⁷

CWP is manufactured by either the electric resistance-welding (“ERW”) process, the continuous-welding (“CW”) process, or the stretch reduction process. The ERW process is a cold-forming process. The raw material input is steel sheet which has been slit into strips of appropriate width that equal the diameter of the pipe to be welded. The strips (or “skelps”) are formed into a tubular shape by passing it through a series of rollers, which provide the initial shaping into round form, as well as guidance into the welding section.

After the strips have been formed to a tubular shape, the edges are heated by electrical resistance and welded by a combination of heat and pressure. The heat for welding is generated by the resistance of the steel to the flow of the electric current. The welding pressure causes some of the metal to be squeezed from the joint, forming beads of metal on both the inside and outside of the tube. While still in the continuous processing line, the tube is then subjected to post-weld heat treatment, as required. This may involve heat treatment of

³⁷ Unless otherwise noted, this information is based on Original publication, pp. I-20—I-22.

the welded seam only, or treatment of the entire pipe. After heat treatment, sizing rollers shape the tube to the correct diameter. The product is cooled and then cut at the end of the tube mill by a flying shear or saw, synchronized with the tube's movement. The ERW process can be used to cover the full range of standard pipe diameters subject to these reviews.

In the CW process,³⁸ the entire steel strip is heated to approximately over 2,000 degrees Fahrenheit in a gas-fired, continuous furnace. As the strip leaves the furnace, super-heated air from a blower raises the temperature of the edges for welding. The strip is formed into tubular shape by a series of rollers, and the edges are butted together under pressure to form the weld. While still hot, the product may be processed through a stretch reduction mill, which simultaneously reduces the diameter and wall thickness of the pipe. The continuous tube is then cut into predetermined lengths by a flying saw or shear. The CW method can be used to produce pipe up to 4.5 inches in outside diameter ("O.D").

In the stretch reduction process, a "mother" tube produced on an ERW or CW mill is subsequently placed on a stretch reduction mill which heats and stretches the tube to produce pipe of various smaller diameters and thinner wall thicknesses. Use of a stretch mill can be advantageous because it allows the company to produce a single diameter and wall thickness of mother tubes on its ERW or CW mill allowing these operations to run more efficiently while still producing other pipe sizes on the stretch reduction mill.

Finishing operations on standard pipe and tube may include hydrostatic testing, oiling, and galvanizing. The process of galvanizing involves the application of a zinc coating to steel pipe for protection from atmospheric corrosion. In a hot-dip process of galvanizing, cut lengths of steel pipe are dipped in a bath of molten zinc maintained at a temperature of 820 to 860 degrees Fahrenheit. The combination of the temperature of both the zinc and the steel, as well as the immersion time within the zinc bath, determines the thickness of the coating. The zinc coating may be applied to the outside only, or both the inside and outside of the steel pipe, depending on end-use application and industry (e.g., ASTM) specification. In a continuous galvanizing process, the zinc coating may be applied to the outside of the pipe before the steel pipe is cut to length by passing it through a bath of molten zinc.

End finishing may include square cutting, beveling, threading, or grooving. Threaded pipe may be furnished "threaded and coupled," in which case both ends of each length of pipe are threaded and a threaded coupling is applied to one end.

³⁸ Wheatland Tube is the only U.S. producer of continuous welded standard pipe. Wheatland Tube, "SureThread Standard Pipe," <http://www.wheatland.com/surethread>, retrieved on December 16, 2021.

The ERW manufacturing process is similar in the United States and in subject countries. The CW manufacturing process is not used in the subject countries.

Domestic like product issues

In its original determinations, the Commission defined a single domestic like product consisting of CWP coextensive with Commerce's scope.³⁹ In its notice of institution in these current five-year reviews, the Commission solicited comments from interested parties regarding the appropriate domestic like product and domestic industry.⁴⁰ Three interested parties have commented on the Commission's definition of the domestic like product and indicated that they agree with the domestic like product definition or have no comment.⁴¹ No party requested that the Commission collect data concerning other possible domestic like products in their comments on the Commission's draft questionnaires.

U.S. market participants

U.S. producers

During the original investigations, nine firms supplied the Commission with information on their U.S. operations with respect to CWP. These firms accounted for the majority of U.S. shipments of CWP in 2015.⁴² In these current proceedings, the Commission issued U.S. producers' questionnaires to 22 firms, 7 of which provided the Commission with information on their CWP operations. These firms are believed to account for majority of U.S. production of CWP in 2021.⁴³ Presented in table I-10 is a list of current domestic producers of CWP and each

³⁹ Original publication, p. 9.

⁴⁰ 86 FR 60289, November 1, 2021.

⁴¹ Domestic Producers' Response to Notice of Institution of Five-Year Reviews, p. 28; Ajmal's Written Response to the Notice of Institution, p. 10; Universal Respondents' Prehearing Brief at p. 1.

⁴² Original publication, p. III-1. The nine U.S. producers that supplied the Commission with usable questionnaire information during the original investigations were: Allied Tube & Conduit Corporation, Bull Moose Tube Company, California Steel Industries, Maruichi American Corporation, Maruichi Leavitt Pipe & Tube, LLC, Steel Ventures dba EXLTUBE, TMK IPSCO, Western Tube & Conduit Corporation, and Wheatland Tube LLC.

⁴³ Staff's assessment is based on a comparison of which firms responded in these reviews to the firms listed as being potential domestic producers of circular welded pipe by domestic parties in their responses to the notices of institution in the adequacy phase of these reviews, and in the 2018-19 second review for circular welded carbon-quality steel pipe from China (Inv. Nos. 701-TA-447 and 731-TA-1116).

company's position on continuation of the orders, production locations(s), related and/or affiliated firms, and share of reported production of CWP in 2021.

Table I-10

CWP: U.S. producers, positions on orders, U.S. production locations, and shares of reported U.S. production in 2021, by firm

Share in percent

Firm	Position on orders	Production location(s)	Share of production
Atlas Tube	***	Chicago, IL Plymouth, MI Blytheville, AK Birmingham, AL	***
Bull Moose	***	Gerald, MO Chicago Heights, IL Casa Grande, AZ Masury, OH Trenton, GA	***
CSI	***	Fontana, CA	***
EXLTUBE	***	North Kansas City, MO	***
Maruichi	***	Santa Fe Springs, CA	***
Nucor	***	Birmingham, AL Chicago, IL Marseilles, IL Trinity, AL Decatur, AL	***
Wheatland	***	Wheatland, PA Warren, OH Chicago, IL Long Beach, CA	***
All firms	Various	Various	***

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

As indicated in table I-11, no U.S. producers are related to foreign producers of the subject merchandise. In addition, no U.S. producers directly imported the subject merchandise or purchased the subject merchandise from U.S. importers.

U.S. importers

In the original investigations, 35 U.S. importing firms supplied the Commission with usable information on their operations involving the importation of CWP, accounting for *** percent of U.S. imports of CWP during 2015.⁴⁴ Of the responding U.S. importers, one was a domestic producer: ***.

In the current proceeding, the Commission issued U.S. importers' questionnaires to 85 firms believed to be importers of CWP, as well as to all U.S. producers of CWP. Usable questionnaire responses were received from 14 firms, representing *** percent of U.S. imports from subject sources and *** percent of total U.S. imports in 2021.⁴⁵ Table I-12 lists all responding U.S. importers of CWP from Oman, Pakistan, the UAE, and other sources, their locations, and their shares of U.S. imports in 2021.

⁴⁴ This coverage figure is inclusive of the 35 usable questionnaires as well as several firms which certified that they had not imported circular welded pipe into the U.S. since January 2013. Office of Investigations memorandum INV-OO-104 ("revised confidential staff report"), p. IV-1.

⁴⁵ These coverage figures are based on a comparison of import quantities reported in questionnaire responses with official U.S. import statistics quantity data for the seven primary HTS numbers (7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090) in 2021.

Questionnaire responses for importers of CWP from Oman represent *** percent of U.S. imports from Oman in 2021, while questionnaire responses for importers of CWP from the UAE represent *** percent of U.S. imports from the UAE in 2021.

Table I-12
CWP: U.S. importers, their headquarters, and share of imports within each source in 2021, by firm

Share in percent

Firm	Headquarters	Oman	Pakistan	United Arab Emirates	Subject sources	Non-subject sources	All import sources
Ajmal	Abu Dhabi, UAE	***	***	***	***	***	***
Al Jazeera	Suhar, Oman	***	***	***	***	***	***
Atlas	Harrow, ON	***	***	***	***	***	***
Borusan	Istanbul, Turkey	***	***	***	***	***	***
Ferrum	New York, NY	***	***	***	***	***	***
KD Industries	Dubai, UAE	***	***	***	***	***	***
Midwest Air	Long Grove, IL	***	***	***	***	***	***
Optima	Pleasant Hill, CA	***	***	***	***	***	***
Prime Metal	Walden, NY	***	***	***	***	***	***
S&P Steel	Houston, TX	***	***	***	***	***	***
Steel and Pipes	Caguas, PR	***	***	***	***	***	***
Toyota Tsusho	Georgetown, KY	***	***	***	***	***	***
TSI Metal	Dubai, UAE	***	***	***	***	***	***
UTP	Walden, NY	***	***	***	***	***	***
All firms	Various	***	***	***	***	***	***

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. purchasers

The Commission received 30 usable questionnaire responses from firms that bought CWP since January 1, 2016.⁴⁶ Twenty-five responding purchasers are distributors, 3 are end users, 4 are retailers, and 1 identified itself as an equipment manufacturer. Responding U.S. purchasers were located in all regions of the United States, including Puerto Rico, but were most concentrated in the Central Southwest, Midwest, and Southeast. The largest purchasers of CWP during 2016-21 included ***, which accounted for *** percent, *** percent, and *** percent of all reported purchases during this period. Of the total reported purchase quantity during 2016-21, 54.9 percent was of domestic product, 4.5 percent was of subject product, 29.8 percent was of product from nonsubject countries, and 10.8 percent was of product from unknown source countries.⁴⁷

Apparent U.S. consumption and market shares

Quantity

Table I-13 and figure I-2 present data on apparent U.S. consumption and U.S. market shares by quantity for CWP. Apparent consumption decreased irregularly by 5.5 percent from 2016-21, but was 12.1 percent higher in January-June (“interim”) 2022 than in interim 2021. Apparent consumption was at its highest in 2017 (an 18.9 percent increase from the prior year), and at its lowest in 2020 (a 6.0 percent decrease from the prior year). Apparent consumption increased 1.1 percent from 2020 to 2021, however it was nevertheless at its second lowest level among annual periods in 2021.⁴⁸

The share of apparent consumption held by U.S. producers increased irregularly by 7.8 percentage points from 2016-21, but it was 8.2 percentage points lower in interim 2022 than in

⁴⁶ Of the 30 responding purchasers, 28 purchased the domestic product, 5 purchased imports of the subject merchandise from Oman, none purchased imports of the subject merchandise from Pakistan, 8 purchased imports of the subject merchandise from the UAE, and 21 purchased imports of CWP from other sources, including Korea (reported by 12 firms), Canada (9 firms), India (7 firms), Thailand (6 firms), Mexico and Turkey (5 firms each), Taiwan and Vietnam (4 firms each), the Philippines (3 firms), Italy and Ukraine (2 firms each), and Brazil, China, the Dominican Republic, Guatemala, France, Japan, Russia, and South Africa (1 firm each).

⁴⁷ Among the subject countries, 1.8 percent of total reported purchases during 2016-21 was of CWP from Oman, none was of CWP from Pakistan, and 2.8 percent was of CWP from the UAE.

⁴⁸ For further discussions on the trends in U.S. producers’ U.S. shipments, see Part III. For further discussions on trends in subject and nonsubject imports, see Part IV.

interim 2021. After an initial decrease from 2016-17, the share held by U.S. producers increased year to year until 2021, when it decreased 1.7 percentage points from the share in 2020.

The share of apparent consumption held by imports from subject sources increased by 5.4 percentage points from 2016-21, and it was 2.1 percentage points higher in interim 2022 than in interim 2021. The share of apparent consumption held by imports from subject sources increased year to year from 2016-21, with the biggest increase occurring from 2016-17. The share of apparent consumption held by imports from nonsubject sources decreased by 13.2 percentage points from 2016-21, but it was 6.1 percentage points higher in interim 2022 than in interim 2021. The share of apparent consumption held by imports from nonsubject sources increased by 5.1 percentage points from 2016-17, and then fell in every subsequent annual period until 2021, when the share was essentially unchanged from 2020.

Table I-13
CWP: Apparent U.S. consumption and market shares based on quantity, by source and period

Quantity in short tons; shares in percent

Source	Measure	2016	2017	2018
U.S. producers	Quantity	974,885	1,001,532	1,026,549
Oman	Quantity	28,147	48,239	53,704
Pakistan	Quantity	7,010	---	535
UAE	Quantity	52,872	106,132	84,969
Subject sources	Quantity	88,029	154,371	139,208
Nonsubject sources	Quantity	710,744	952,937	702,849
All import sources	Quantity	798,773	1,107,308	842,057
All sources	Quantity	1,773,658	2,108,840	1,868,606
U.S. producers	Share	55.0	47.5	54.9
Oman	Share	1.6	2.3	2.9
Pakistan	Share	0.4	---	0.0
UAE	Share	3.0	5.0	4.5
Subject sources	Share	5.0	7.3	7.4
Nonsubject sources	Share	40.1	45.2	37.6
All import sources	Share	45.0	52.5	45.1
All sources	Share	100.0	100.0	100.0

Table continued.

Table I-13 Continued**CWP: Apparent U.S. consumption and market shares based on quantity, by source and period**

Quantity in short tons; shares in percent

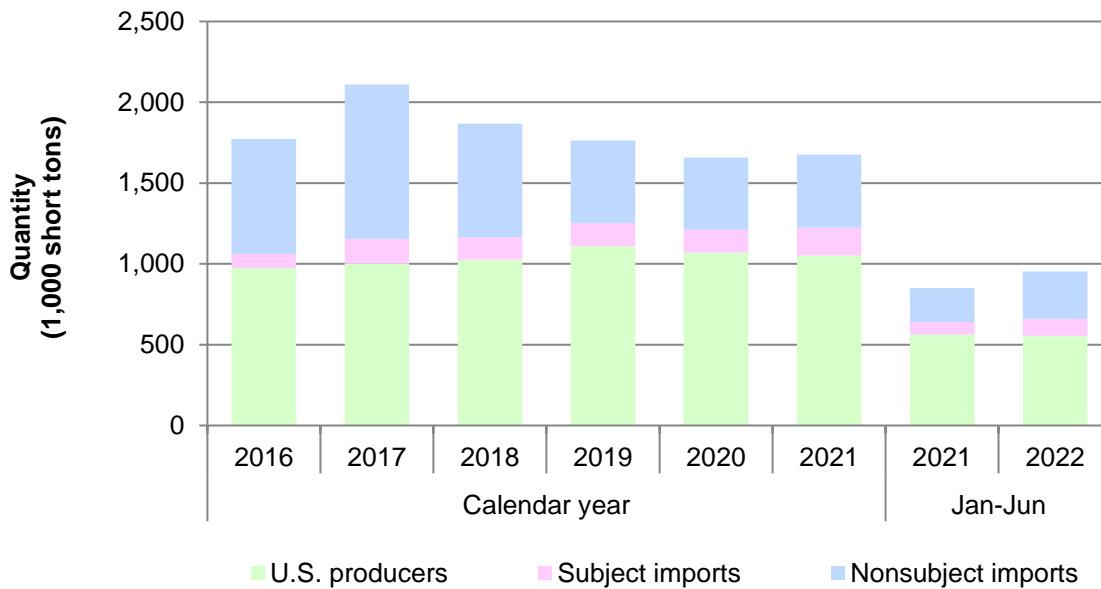
Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
U.S. producers	Quantity	1,110,373	1,069,687	1,052,079	562,686	552,763
Oman	Quantity	54,699	37,375	59,018	26,594	39,829
Pakistan	Quantity	95	---	57	---	---
UAE	Quantity	87,388	105,116	113,982	51,845	68,128
Subject sources	Quantity	142,183	142,491	173,057	78,439	107,958
Nonsubject sources	Quantity	510,997	445,616	450,364	208,994	292,481
All import sources	Quantity	653,179	588,107	623,420	287,434	400,438
All sources	Quantity	1,763,552	1,657,794	1,675,499	850,120	953,201
U.S. producers	Share	63.0	64.5	62.8	66.2	58.0
Oman	Share	3.1	2.3	3.5	3.1	4.2
Pakistan	Share	0.0	---	0.0	---	---
UAE	Share	5.0	6.3	6.8	6.1	7.1
Subject sources	Share	8.1	8.6	10.3	9.2	11.3
Nonsubject sources	Share	29.0	26.9	26.9	24.6	30.7
All import sources	Share	37.0	35.5	37.2	33.8	42.0
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090 accessed August 30, 2022. Imports are based on the imports for consumption data series.

Note: In the original investigation, petitioners estimated that 50-60 percent of imports from nonsubject sources Canada and Mexico were out-of-scope, and staff was able to present more comprehensive import data primarily using questionnaire data (given high coverage from subject and nonsubject sources) and additional data included from proprietary Customs records. (Petition, pp. 17-18, and Original publication, p. IV-1, fn. 3.) Therefore, official import statistics presented in this report from nonsubject sources may be overstated.

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 shown as "---".

Figure I-2
CWP: Apparent U.S. consumption based on quantity, by source and period



Source: Compiled from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090 accessed August 30, 2022. Imports are based on the imports for consumption data series.

Note: In the original investigation, petitioners estimated that 50-60 percent of imports from nonsubject sources Canada and Mexico were out-of-scope, and staff was able to present more comprehensive import data primarily using questionnaire data (given high coverage from subject and nonsubject sources) and additional data included from proprietary Customs records. (Petition, pp. 17-18, and Original publication, p. IV-1, fn. 3.) Therefore, official import statistics presented in this report from nonsubject sources may be overstated.

Value

Table I-14 and figure I-3 present data on apparent U.S. consumption and U.S. market shares by value for CWP.

Table I-14
CWP: Apparent U.S. consumption and market shares based on value, by source and period

Value in 1,000 dollars; shares in percent

Source	Measure	2016	2017	2018
U.S. producers	Value	839,541	972,321	1,228,996
Oman	Value	16,202	33,643	48,306
Pakistan	Value	3,969	---	452
UAE	Value	32,346	79,402	81,828
Subject sources	Value	52,518	113,045	130,585
Nonsubject sources	Value	634,549	842,481	772,491
All import sources	Value	687,067	955,526	903,076
All sources	Value	1,526,608	1,927,847	2,132,072
U.S. producers	Share of value	55.0	50.4	57.6
Oman	Share of value	1.1	1.7	2.3
Pakistan	Share of value	0.3	---	0.0
UAE	Share of value	2.1	4.1	3.8
Subject sources	Share of value	3.4	5.9	6.1
Nonsubject sources	Share of value	41.6	43.7	36.2
All import sources	Share of value	45.0	49.6	42.4
All sources	Share of value	100.0	100.0	100.0

Table continued.

Table I-14 Continued**CWP: Apparent U.S. consumption and market shares based on value, by source and period**

Value in 1,000 dollars; shares in percent

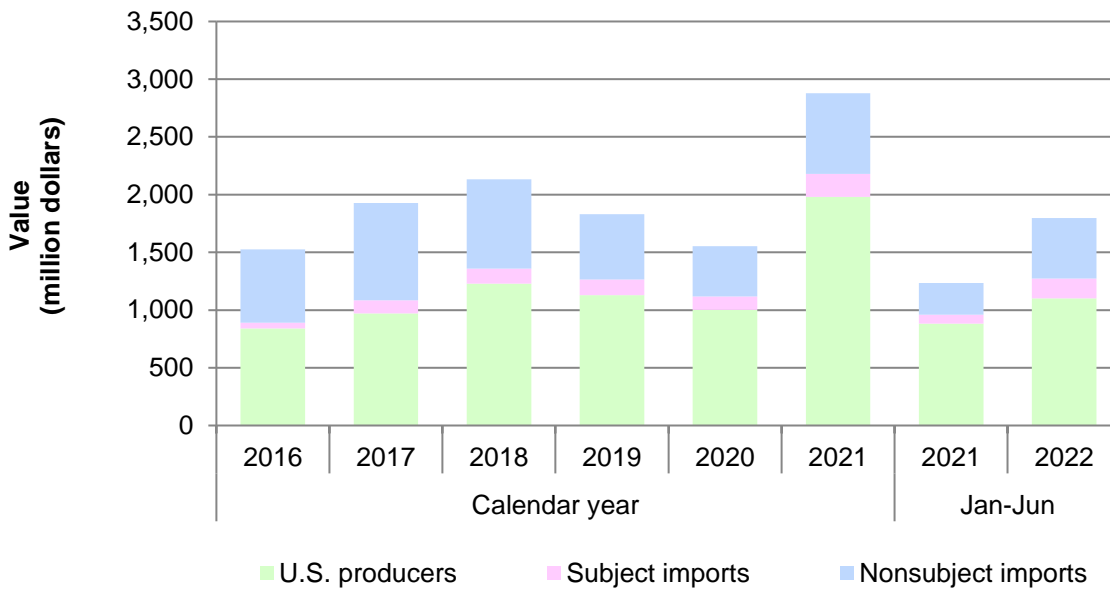
Source	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
U.S. producers	Value	1,130,275	1,002,365	1,980,040	881,974	1,100,295
Oman	Value	50,062	29,675	67,933	25,093	62,819
Pakistan	Value	69	---	56	---	---
UAE	Value	84,312	87,159	132,809	51,939	110,349
Subject sources	Value	134,443	116,834	200,798	77,032	173,168
Nonsubject sources	Value	566,306	432,809	698,216	275,179	523,124
All import sources	Value	700,749	549,643	899,014	352,211	696,292
All sources	Value	1,831,024	1,552,008	2,879,054	1,234,185	1,796,587
U.S. producers	Share of value	61.7	64.6	68.8	71.5	61.2
Oman	Share of value	2.7	1.9	2.4	2.0	3.5
Pakistan	Share of value	0.0	---	0.0	---	---
UAE	Share of value	4.6	5.6	4.6	4.2	6.1
Subject sources	Share of value	7.3	7.5	7.0	6.2	9.6
Nonsubject sources	Share of value	30.9	27.9	24.3	22.3	29.1
All import sources	Share of value	38.3	35.4	31.2	28.5	38.8
All sources	Share of value	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090 accessed August 30, 2022. Imports are based on the imports for consumption data series, and import values are reported on a landed, (normal) duty-paid value.

Note: In the original investigation, petitioners estimated that 50-60 percent of imports from nonsubject sources Canada and Mexico were out-of-scope, and staff was able to present more comprehensive import data primarily using questionnaire data (given high coverage from subject and nonsubject sources) and additional data included from proprietary Customs records. (Petition, pp. 17-18, and Original publication, p. IV-1, fn. 3.) Therefore, official import statistics presented in this report from nonsubject sources may be overstated.

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 shown as "---".

Figure I-3
CWP: Apparent U.S. consumption based on value, by source and period



Source: Compiled from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090 accessed August 30, 2022. Imports are based on the imports for consumption data series, and import values are reported on a landed, (normal) duty-paid value.

Note: In the original investigation, petitioners estimated that 50-60 percent of imports from nonsubject sources Canada and Mexico were out-of-scope, and staff was able to present more comprehensive import data primarily using questionnaire data (given high coverage from subject and nonsubject sources) and additional data included from proprietary Customs records. (Petition, pp. 17-18, and Original publication, p. IV-1, fn. 3.) Therefore, official import statistics presented in this report from nonsubject sources may be overstated.

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

U.S. market characteristics

CWP is used for the low-pressure conveyance of water, steam, natural gas, air and other liquids and gases in plumbing and heating systems, air conditioning units, automatic sprinkler systems, and other similar uses.¹ CWP may also be used for light load-bearing and mechanical applications, such as fence tubing and scaffolding. Most firms reported no changes in end uses since January 1, 2016. Demand for CWP is a derived demand, driven by overall U.S. economic activity and construction spending, in particular nonresidential construction spending, as well as oil and gas prices. The domestic CWP market is served mostly by domestic producers and nonsubject imports; U.S. producers' shipments have accounted for slightly less than two-thirds of the domestic market since 2019 (increasing from approximately half in 2016-18), while nonsubject imports represented between one-quarter and one-third of the market during most the review period. The vast majority of responding firms, including all six U.S. producers, 10 of 12 importers, and 3 of 6 foreign producers reported that there have been no significant changes in the product range, product mix, or marketing in the CWP market since January 1, 2016, nor do they anticipate any changes in the future.

Apparent U.S. consumption of CWP fluctuated but decreased overall during January 2016-June 2022. Overall, apparent U.S. consumption in 2021 was 5.5 percent lower than in 2016.

Impact of section 232 tariffs

U.S. producers, importers, purchasers, and foreign producers were asked whether the section 232 measures imposed in March 2018 on imported steel/aluminum or changes in the measures had an impact on the cost, price, supply, and/or demand for CWP in the United States since January 1, 2016. Most firms reported that the measures did have an impact in the market for CWP in the United States; several firms, especially purchasers, reported that they did not know (table II-1). Among the firms elaborating on the impact of the section 232 measures, most reported that cost, price, domestic supply, and demand for domestic product all increased.

¹ Original publication, p. II-1.

Table II-1**CWP: Count of firms' responses regarding whether the 232 measures had an impact on the CWP market**

Count in number of firms reporting

Source	Yes	No	Don't Know
U.S. producers	***	***	***
Importers	***	***	***
Purchasers	***	***	***
Foreign producers	***	***	NA

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

Firms generally indicated that hot-rolled coil costs increased, that the demand for imported hot-rolled coil and CWP decreased, at least initially, which led to increased domestic market share of CWP. Several firms also reported that the increase in prices were passed on to consumers and that this contributed to inflation.

Channels of distribution

As shown in table II-2, U.S. producers and importers of both subject and nonsubject product all sold mainly to distributors, though the share of both subject imports and nonsubject imports shipped to end users increased slightly over the review period.

Table II-2**CWP: Share of U.S. shipments by source, channel of distribution, and period**

Shares in percent

Source	Channel	2016	2017	2018	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
United States	Distributor	***	***	***	***	***	***	***	***
United States	End user	***	***	***	***	***	***	***	***
Oman	Distributor	***	***	***	***	***	***	***	***
Oman	End user	***	***	***	***	***	***	***	***
Pakistan	Distributor	***	***	***	***	***	***	***	***
Pakistan	End user	***	***	***	***	***	***	***	***
UAE	Distributor	***	***	***	***	***	***	***	***
UAE	End user	***	***	***	***	***	***	***	***
Subject sources	Distributor	***	***	***	***	***	***	***	***
Subject sources	End user	***	***	***	***	***	***	***	***
Nonsubject sources	Distributor	***	***	***	***	***	***	***	***
Nonsubject sources	End user	***	***	***	***	***	***	***	***
All import sources	Distributor	***	***	***	***	***	***	***	***
All import sources	End user	***	***	***	***	***	***	***	***

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

Geographic distribution

U.S. producers reported selling CWP to all regions in the contiguous United States, while importers reported selling subject product to all but the Mountain region (table II-3). Importers reported selling subject product from *** and subject product from ***. For U.S. producers, *** percent of sales were within 100 miles of their production facilities, *** percent were between 101 and 1,000 miles, and *** percent were over 1,000 miles. Importers sold *** percent within 100 miles of their U.S. points of shipment, *** percent between 101 and 1,000 miles, and *** percent over 1,000 miles.

Table II-3
CWP: Count of U.S. producers' and U.S. importers' geographic markets

Number of firms reporting

Region	U.S. producers	Oman	Pakistan	UAE	Subject sources
Northeast	5	***	0	***	5
Midwest	5	***	0	***	4
Southeast	6	***	0	***	6
Central Southwest	6	***	0	***	5
Mountain	7	***	0	***	0
Pacific Coast	7	***	0	***	7
Other	2	***	0	***	0
All regions (except Other)	5	***	0	***	0
Reporting firms	7	1	0	6	7

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-4 provides a summary of the supply factors regarding CWP from U.S. producers and from subject countries. In general, domestic producers' capacity utilization remained relatively steady while capacity utilization from cumulated subject sources decreased, and almost all firms reported an ability to shift production of CWP to other products.

Table II-4
CWP: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Quantity in short tons; ratio and share in percent

Factor	Measure	United States	Oman	Pakistan	UAE	Subject sources
Capacity 2016	Quantity	1,503,724	***	---	***	771,873
Capacity 2021	Quantity	1,602,677	***	---	***	1,029,465
Capacity utilization 2016	Ratio	67.6	***	---	***	64.5
Capacity utilization 2021	Ratio	67.3	***	---	***	51.4
Inventories to total shipments 2016	Ratio	***	***	---	***	***
Inventories to total shipments 2021	Ratio	***	***	---	***	***
Home market shipments 2021	Share	***	***	---	***	27.5
Non-US export market shipments 2021	Share	***	***	---	***	***
Ability to shift production (firms reporting "yes")	Count	*** of 7	*** of 1	0 of 0	*** of 6	*** of 7

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

Note: Responding U.S. producers accounted for the majority of U.S. production of CWP in 2021. Responding foreign producer/exporter firms accounted for ***. No foreign producer questionnaire responses were submitted by producers from Pakistan. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Part I, "Summary Data and Data Sources" and Part IV.

Domestic production

Based on available information, U.S. producers of CWP have the ability to respond to changes in demand with relatively large changes in the quantity of shipments of U.S.-produced CWP to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity, some inventories, and the ability to shift production to or from alternate products. The primary factor mitigating domestic producers' supply responsiveness is the limited ability to shift shipments from alternate markets.

Domestic producers' overall capacity and production both increased between 2016 and 2021, by 6.6 percent and 6.1 percent, respectively, leading to a slight decrease in capacity utilization of 0.3 percentage points.² Domestic producers' inventories as a ratio to total shipments increased by *** percentage points between 2016 and 2021. Domestic producers' export shipments as a share of total shipments were relatively small and decreased over the

² ***. See Part III, "Financial experience of U.S. producers," for more information.

period. U.S. producers' primary export markets were reported to be Canada (***) and Mexico (***) firms). Other products that domestic producers reportedly can produce on the same equipment as CWP include several types of tubing (including heavy-walled and light-walled rectangular tubing, mechanical tubing, and square tubing), line pipe and OCTG products, electrical conduit products and conduit shells for rigid electrical conduit, and solar torque tubes. Factors affecting U.S. producers' ability to shift production include down time for capital improvements or equipment replacement and re-tooling.

Subject imports from Oman

Based on available information, the responding producer of CWP from Oman, Al Jazeera, has the ability to respond to changes in demand with large changes in the quantity of shipments of CWP to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity, *** inventories, the ability to shift shipments from alternate markets, ***.

The responding Omani producer's capacity utilization ***. Inventories as a ratio to total shipments ***. Al Jazeera identified its major export markets for CWP as ***,³ ***.

Subject imports from Pakistan

No producers in Pakistan provided foreign producer questionnaire responses in this current proceeding. Based on available information, producers of CWP from Pakistan have the ability to respond to changes in demand with large changes in the quantity of shipments of CWP to the U.S. market. The main contributing factors to this degree of responsiveness of supply appear to be the availability of unused capacity and the ability to shift shipments from alternate markets.⁴ There were no reported major developments in the Pakistani CWP industry

³ ***.

⁴ For more on the current industry in Pakistan, see Part IV, "The industry in Pakistan." In the original investigations, based on information provided by the sole responding producer of CWP from Pakistan,

(continued...)

since the imposition of the antidumping duty order identified by interested parties in this proceeding.⁵

Subject imports from the UAE

Based on available information, producers of CWP from the UAE have the ability to respond to changes in demand with large changes in the quantity of shipments of CWP to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity along with increasing overall capacity, the ability to shift shipments from alternate markets, and the ability to shift production to or from alternate products. A factor mitigating responsiveness of supply includes somewhat limited inventories.

Emirati producers' capacity utilization decreased between 2016 and 2021, driven primarily by an increase in total capacity (of *** percent) alongside a very slight increase in production (of *** percent). Capacity utilization during January-June 2022 (at *** percent) was higher than in 2021 (at *** percent). Emirati producers' non-U.S. export shipments made up almost half of their total shipments in 2021. *** of the six responding Emirati producers reported being able to switch production (capacity) between CWP and other products using the same equipment and/or labor. The other products these firms reported producing on the same equipment as CWP included square and rectangular tubes and square and rectangular hollow section pipes. Factors affecting foreign producers' ability to shift production included downtime, added costs, and raw material and equipment availability.

Imports from nonsubject sources

Nonsubject imports accounted for a majority of all imports of CWP during 2016-21, although their share decreased gradually over the period. Nonsubject imports accounted for 89.0 percent of total U.S. imports in 2016 and 72.2 percent in 2021. The largest single source of nonsubject imports during January 2016-June 2022 was Canada, which accounted for *** percent of reported nonsubject imports during the review period.⁶ Other reported nonsubject

International Industries Limited, producers of CWP from Pakistan were estimated to have the ability to respond to changes in demand with large changes in the quantity of shipments of CWP to the U.S. market due to the availability of unused capacity and the ability to shift shipments from alternate markets. Original publication, p. II-7.

⁵ Though not limited to CWP, domestic producers in their response to the notice of institution noted a scholarly article that describes rapid growth in the overall steel industry in Pakistan since 2015. Domestic producers' response to the notice of institution, pp. 16-17.

⁶ Official import statistics for nonsubject sources, particularly Canada and Mexico, may be overstated. In the original investigations, record evidence suggested that considerable volumes of

(continued...)

sources included Costa Rica, Guatemala, India, Japan, Turkey, and several countries in Southeast Asia (such as Indonesia, Korea, Malaysia, Taiwan, and Vietnam).

Supply constraints

Most firms reported that they did not experience any supply constraints since January 1, 2016. However, 1 of 7 U.S. producers, 3 of 13 importers, and 10 of 30 purchasers reported that they did. Most of these firms reported supply chain disruptions for a variety of reasons, including order limitations, insufficient supply of shipping vessels, port congestion, and availability of truckers. Several purchasers also noted a lack of raw materials (such as hot-rolled coil substrate), while several more reported constraints on CWP from South Korea due to the section 232 measures. Many of them cited 2021 as the worst-affected year for these constraints.

New suppliers

Only 1 of 30 purchasers indicated that new suppliers entered the U.S. market since January 1, 2016, though 4 of 23 expect additional entrants. Purchaser *** cited Jindal USA as a new entrant, and the firms anticipating additional entrants suggested that some small production lines are in process now, that some foreign suppliers are opening U.S. locations, and that “there are always new companies arising.”

U.S. demand

Based on available information, the overall demand for CWP is likely to experience moderate changes in response to changes in price. The main contributing factors are the somewhat limited range of substitute products and the wide range of cost shares of CWP in most of its end-use products.

End uses and cost share

U.S. demand for CWP depends on the demand for U.S.-produced downstream products, of which there is a wide variety. As discussed earlier, CWP is used for the low-pressure conveyance of water, steam, natural gas, air and other liquids and gases in plumbing and heating systems, air conditioning units, automatic sprinkler systems, as well as other similar uses. In the original investigations, the reported end uses included basement columns, fencing, fire sprinkler systems, handrail construction, helical piers, low pressure lines, manufacturing,

imports under the primary HTS numbers from Canada and Mexico were out-of-scope. Original publication, p. IV-1, fn. 4.

mechanical tube, non-residential construction, pipelines, plumbing, shopping carts, and gas and water transmission.⁷ It was also reported that galvanized CWP is generally used in corrosive or freezer environments, while black pipe is generally used in standard building applications.⁸ In the current reviews, most firms, including all seven responding U.S. producers, 11 of 12 importers, and 12 of 13 purchasers reported no changes in end uses since January 1, 2016, and most do not anticipate any changes in the future.

In the original investigations, in addition to the wide variety of end use applications, firms reported a wide range of cost shares for CWP. In those investigations, the reported cost shares were as follows:

- Commercial and industrial construction (5-60 percent)
- Plumbing (15-50 percent)
- Water wells (33-80 percent)
- Fencing (40-75 percent)
- Shopping carts (45 percent)
- Fire sprinkler systems (50 percent)
- Handrail construction (85 percent)
- Mechanical tubing (90 percent)
- Oil and gas applications (95 percent)⁹

Business cycles

Most firms reported that the CWP market was not subject to business cycles or distinct conditions of competition. However, 2 of 7 U.S. producers, 8 of 13 importers, and 10 of 30 purchasers indicated that the market was subject to business cycles, and 3 of 7 U.S. producers, 2 of 13 importers, and 2 of 30 purchaser reported that the CWP market was subject to distinct conditions of competition. Among the firms reporting business cycles, firms generally reported that the CWP market follows seasonal cycles in the construction industry (with less building in the winter months), while a few firms indicated that it follows consumer spending and the overall economy. Regarding distinct conditions of competition, firms cited “import surges” (***), producers switching from line pipe and OCTG to CWP (***), the COVID-19 pandemic (***), and global tariffs, the cost of oil, and ocean freight rates (***) .

⁷ Original publication, p. II-10.

⁸ Original publication, p. II-10.

⁹ Original publication, p. II-11.

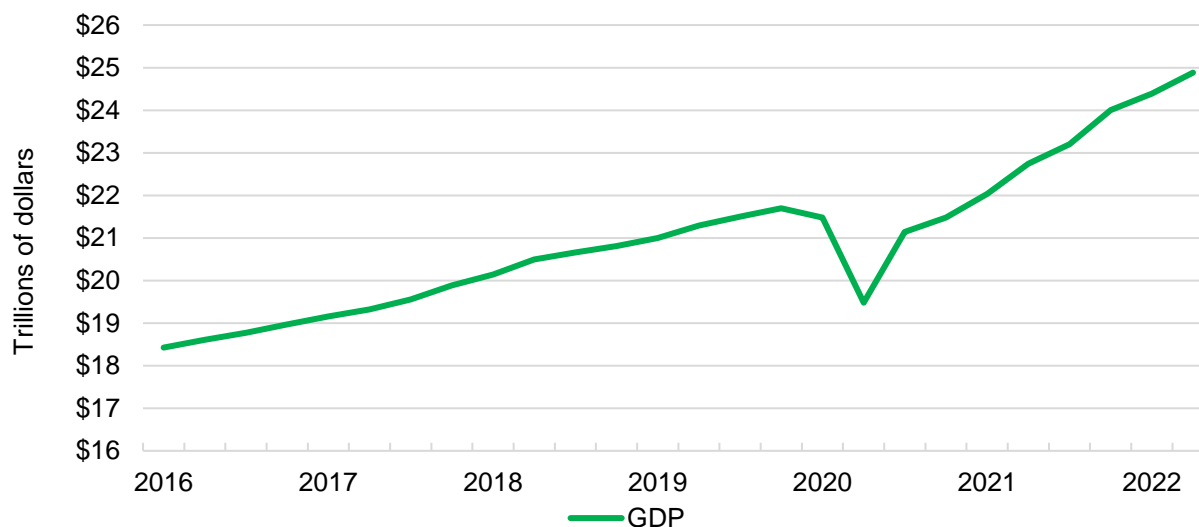
Demand trends

Demand for CWP is driven by overall U.S. economic activity and construction spending, in particular nonresidential construction spending, while a smaller market segment for CWP is affected by the oil and gas industry.¹⁰ All of these demand indicators increased over the review period, though the impact of the COVID-19 pandemic beginning in 2020 particularly impacted GDP and construction spending.¹¹

As shown in figure II-1, U.S. gross domestic product increased steadily through the fourth quarter of 2019, then dropped in the first two quarters of 2020 before increasing through the second quarter of 2022, ending at 35.0 percent higher in the second quarter of 2022 compared to the first quarter of 2016.

Figure II-1

GDP: Gross Domestic Product, trillions of dollars, seasonally adjusted annual rate, by first quarter of 2016–second quarter of 2022



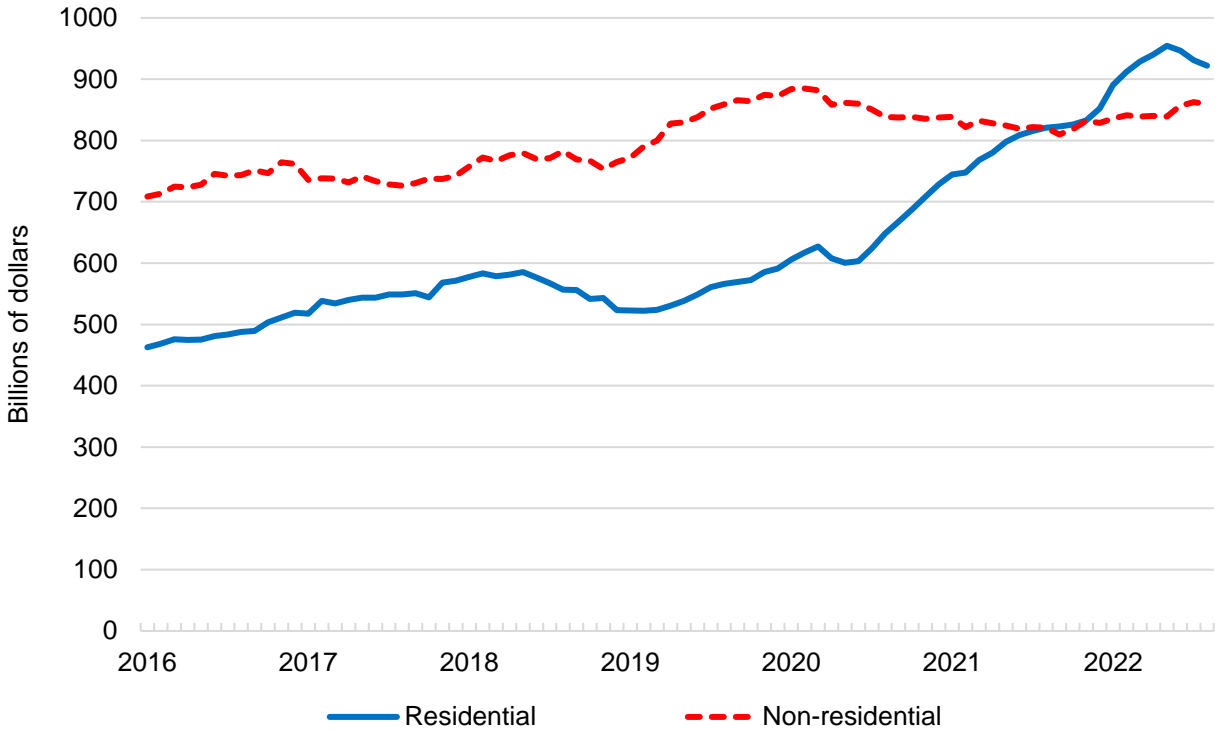
Source: Bureau of Economic Analysis, National Income and Product Accounts-Table 1.1.5, Gross Domestic Product, available at <https://apps.bea.gov/iTable/iTable.cfm?reqid=19&step=2#reqid=19&step=2&isuri=1&1921=survey>, retrieved September 11, 2022.

¹⁰ See Original publication, p. II-8. Mr. Michael Blatz, President of the Bull Moose Company, a domestic producer of CWP, testified in the original investigations that multi-family dwelling construction, such as apartments or condominiums, require significant amounts of sprinkler pipe and that changing regulations for commercial building construction requires retrofitting. Original publication, p. II-8.

¹¹ See also NIH National Library of Medicine, *An impact study of COVID-19 on six different industries: Automobile, energy and power, agriculture, education, travel and tourism and consumer electronics*, section 2.2, available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8014102/>, accessed September 11, 2022.

As shown in figure II-2, construction spending for residential and non-residential applications both increased between January 2016 and August 2022. Non-residential construction spending generally decreased throughout 2020 compared to previous years and remained relatively steady through August 2022. Residential construction spending showed three periods of decline over the review period, between May 2018 and February 2019, March–May 2020, and May–August 2022. Residential construction spending overtook non-residential construction spending in September 2021 and has generally outpaced non-residential construction spending since. Residential construction spending, non-residential construction spending, and total construction spending increased by 104.6 percent, 20.9 percent, and 54.0 percent, respectively, between January 2016 and June 2022. Between June and August of 2022, residential and total construction spending decreased by 2.6 percent and 1.2 percent, respectively, while nonresidential construction spending increased by 0.3 percent.

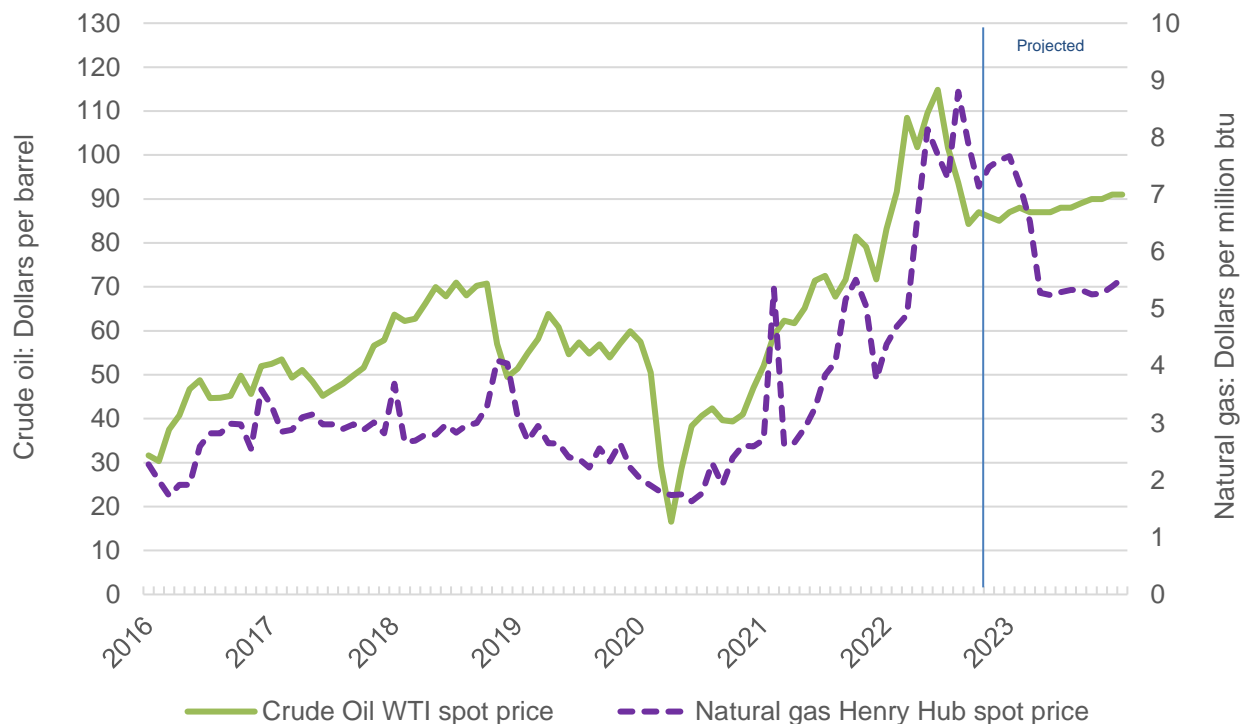
Figure II-2
U.S. construction spending: Value of construction put in place, residential and non-residential construction, seasonally adjusted annual rate, billions of dollars, monthly, January 2016–August 2022



Source: United States Census Bureau, Construction Spending, available at https://www.census.gov/construction/c30/historical_data.html, retrieved October 25, 2022.

As shown in figure II-3, crude oil and natural gas prices fluctuated over the review period, but were higher in August 2022 than in January 2016 by 195.7 and 286.0 percent, respectively. The U.S. Energy Information Administration projects crude oil prices to increase steadily and for natural gas prices to decline steeply in 2023.

Figure II-3
Crude oil and natural gas prices: Crude oil West Texas Intermediate spot price (dollars per barrel) and Natural gas Henry Hub spot price (dollars per million btu), monthly, January 2016–September 2022 actual, October 2022–December 2023 projected



Source: U.S. Energy Information Administration, U.S. Energy Markets Summary, available at <https://www.eia.gov/outlooks/steo/data/browser/#/?v=3&f=M&s=&start=201601&end=202312&linechart=COPRUS&ctype=linechart&maptype=0&id=>, retrieved October.

Firms’ responses regarding U.S. demand for CWP since January 1, 2016 were mixed, though most firms reported that it either fluctuated or did not change (table II-5). Several firms also reported that it increased, although no firms reported a decrease in U.S. demand for CWP since January 1, 2016.¹² Regarding foreign demand for CWP, most firms reported that it either

¹² Domestic producers argue that “while economic activity and construction spending have generally increased since 2016, these demand drivers suggest that demand for CWP will likely decline in the reasonably foreseeable future as signs of an impending recession are increasingly apparent.” They also argue that “since the Commission received the responses to questionnaires on August 15, 2022, the
(continued...)

fluctuated or did not change. Most firms also expect demand to either fluctuate or not change over the next two years, though several expect demand to increase (table II-6).

Table II-5
CWP: Count of firms' responses regarding overall domestic and foreign demand since January 1, 2016, by firm type

Number of firms reporting

Market	Firm type	Increase	No change	Decrease	Fluctuate
U.S. demand	U.S. producers	2	2	0	2
U.S. demand	Importers	3	1	0	8
U.S. demand	Purchasers	7	9	0	13
U.S. demand	Foreign producers	2	1	0	2
Foreign demand	U.S. producers	0	2	0	3
Foreign demand	Importers	2	1	0	7
Foreign demand	Purchasers	0	11	2	8
Demand in subject country	Foreign producers	3	0	0	2
Demand in other export markets	Foreign producers	3	0	0	2
Demand for end use products	Purchasers	3	6	1	5

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

Table II-6
CWP: Count of firms' responses regarding anticipated overall domestic and foreign demand, by firm type

Number of firms reporting

Market	Firm type	Increase	No change	Decrease	Fluctuate
U.S. demand	U.S. producers	0	4	0	2
U.S. demand	Importers	4	1	0	7
U.S. demand	Purchasers	4	7	3	13
U.S. demand	Foreign producers	1	2	0	3
Foreign demand	U.S. producers	0	2	0	3
Foreign demand	Importers	3	1	0	6
Foreign demand	Purchasers	0	8	3	9
Demand in subject country	Foreign producers	3	0	0	3
Demand in other export markets	Foreign producers	3	0	0	3

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

outlook for U.S. economic activity and construction spending has further deteriorated and steel demand has fallen. See Domestic producers' prehearing brief, pp. 31-36; Domestic producers' posthearing brief, Answers to Commission Questions In Lieu of Hearing, pp. 3-5.

When purchasers were asked if the demand for their final products incorporating CWP had changed since January 1, 2016, most firms reported either no change (6 firms) or fluctuating demand (5 firms). Three firms reported an increase in demand for their final products, however, and one firm reported a decrease, and four responding purchasers reported that this had an effect on their demand for CWP.

Substitute products

In the original investigations, most firms reported that there were no substitutes for CWP, though some reported substitutes for various end-use applications.¹³ Among the reported substitutes were stamped parts like door and chassis beams and extruded door beams for automotive end uses; seamless pipe, beams, API line pipe, square or rectangular tube, wide flange or standard beams, concrete, and wood in structural or construction end uses; concrete, cast iron, plastic pipe, and seamless tubing in water and gas transmission applications; and wood, vinyl, and plastic in plumbing applications.¹⁴

In the current reviews, most firms, including 6 of 7 U.S. producers, 11 of 12 importers, and 28 of 29 purchasers, reported that there have been no changes in end use applications since January 1, 2016, and most do not anticipate any changes in the immediate future. Among the firms reporting changes in end use applications, *** reported that CWP is being used as handrails, *** reported changes “***” and *** reported that fiberglass, polyethylene, and hybrid (flex-steel) are newer substitutes.

Substitutability issues

This section assesses the degree to which U.S.-produced CWP and imports of CWP from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of CWP from domestic and imported sources based on those factors. Based on available data, staff believes that there is a moderate-to-high degree of substitutability between domestically produced CWP and CWP imported from subject sources.¹⁵ Factors contributing to this level of substitutability include similarities between

¹³ Original publication, pp. II-12–13.

¹⁴ Original publication, pp. II-12–13.

¹⁵ The degree of substitution between domestic and imported CWP depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers

(continued...)

domestically produced CWP and CWP imported from subject countries across multiple purchase factors, interchangeability between domestic and subject sources, limited significant factors other than price, limited domestic content requirements, and similar types of CWP being available from both domestic and subject sources. Factors reducing substitutability may include some preference for domestic product due to availability and lead times advantages and/or firm or customer preferences, and some potential quality differences.

Factors affecting purchasing decisions¹⁶

Purchaser decisions based on source

As shown in table II-7, most purchasers and their customers sometimes make purchasing decisions based on the producer or country of origin. Of the purchasers that reported that they always make decisions based on the manufacturer, firms cited quality, availability, and location as reasons. Of the purchasers that reported that they always make decisions based on the country of origin, both firms that elaborated reported prioritizing the United States and Canada for their purchases.

Table II-7

CWP: Count of purchasers' responses regarding frequency of purchasing decisions based on producer and country of origin

Number of firms reporting

Firm making decision	Decision based on	Always	Usually	Sometimes	Never
Purchaser	Producer	5	6	10	9
Customer	Producer	0	1	14	12
Purchaser	Country	4	6	16	3
Customer	Country	0	1	18	8

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

can switch from domestically produced CWP to the CWP 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.).

¹⁶ Twenty-nine of 30 purchasers indicated they had marketing/pricing knowledge of domestic product, 3 of product from Oman, none of product from Pakistan, 9 of product from the UAE, and 19 of product from nonsubject countries. The nonsubject countries purchasers reported knowledge of included South Korea (9 firms), Canada (7 firms), India (6 firms), Turkey (5 firms), Thailand and Vietnam (4 firms each), Italy, Mexico, Taiwan, and Ukraine (2 firms each), and China, the Dominican Republic, Germany, Guatemala, the Philippines, and Russia (1 firm each).

When purchasers were asked whether they or their customers ever specifically order CWP from one country in particular over other possible sources, a majority (20 of 30 firms) reported that they do. Nearly all of these firms reported that they or their customers occasionally prefer domestic CWP due to Buy America requirements or because their customers request it. Two firms also reported a preference for CWP from South Korea, and one reported that its customers prefer domestic or “North American” CWP.

When purchasers were asked if certain grades, types, and/or sizes of CWP were only available from certain country sources, almost all responding firms (24 of 25) reported that there were not. One firm stated “I would think mill size and capabilities vary but {I’m} not sure.”

Importance of purchasing domestic product

All of the 27 responding purchasers reported that most or all of their purchases had no domestic requirement, representing 75.0 percent of their total reported purchases.¹⁷ Seventeen purchasers reported that domestic product was required by law (for 6.2 percent of their total purchases), and fifteen purchasers reported it was required by their customers (for 4.3 percent of their total purchases). Six purchasers reported other preferences for domestic product (for 14.5 percent of their total purchases), including a preference for using domestic product in state or highway projects, and personal and/or customer preferences for domestic CWP.

Most important purchase factors

The most often cited top three factors firms consider in their purchasing decisions for CWP were price (29 firms), quality (20 firms), and availability (15 firms) as shown in table II-8. Price was the most frequently cited first-, second-, and third-most important factor (cited by 12 firms, 9 firms, and 8 firms, respectively). Quality was the second most frequently cited factor, and availability was the third most frequently cited factor. Delivery and product range were also mentioned by 6 firms and 5 firms, respectively.

¹⁷ Only one firm, ***, reported that a minority (25.0 percent) of its purchases had no domestic requirement.

Table II-8

CWP: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Number of firms reporting

Factor	First	Second	Third	Total
Price/Cost	12	9	8	29
Quality	8	7	5	20
Availability	6	7	2	15
Delivery	---	2	4	6
Product range	---	---	5	5
All other factors	4	5	6	15

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

Note: Other factors include lead time and supplier relationship (2 firms each), and approved supplier, continuity of supply customer requirements, discounts, domestic requirements, location, preferred status, product offerings, reliability, service, and terms (1 firm each).

The majority of purchasers (15 of 29 firms) reported that they usually purchase the lowest-priced product, while 9 reported sometimes doing so, and 5 reported always doing so. No firms reported that they never purchase the lowest-priced product.

Importance of specified purchase factors

Purchasers were asked to rate the importance of 18 factors in their purchasing decisions (table II-9). The factors rated as very important by more than half of responding purchasers were price and product consistency (28 firms each), availability and quality meets industry standards (26 firms each), reliability of supply (25 firms), delivery time (19 firms), and delivery terms and grade of steel (15 firms each).

Table II-9
CWP: Count of purchasers' responses regarding importance of purchase factors, by factor

Number of firms reporting

Factor	Very important	Somewhat important	Not important
Availability	26	3	0
Certified as lead-free	7	10	13
Delivery terms	15	10	5
Delivery time	19	8	2
Discounts offered	14	10	6
Extension of credit	4	15	11
Grade of steel	15	13	2
Minimum quantity requirements	2	20	7
Packaging	5	18	6
Payment terms	13	13	4
Price	28	1	1
Product consistency	28	2	0
Product range	12	12	3
Quality meets industry standards	26	2	1
Quality exceeds industry standards	9	13	6
Reliability of supply	25	4	1
Technical support/service	4	22	4
U.S. transportation costs	13	14	3

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

Lead times

CWP from U.S. producers is primarily sold from inventory, while CWP from subject importers is primarily produced-to-order. U.S. producers reported that *** percent of their commercial shipments were sold from inventory, with lead times averaging *** days. The remaining *** percent of their commercial shipments were produced-to-order, with lead times averaging *** days. Importers reported that *** percent of their commercial shipments were produced-to-order, with lead times averaging *** days, while *** percent were sold from U.S. inventory, with lead times averaging *** days. The remaining *** percent of importers' commercial shipments were sold from the foreign manufacturers' inventories.

Supplier certification

Twelve of 30 responding purchasers require their suppliers to become certified or qualified to sell CWP to their firm, with the reported time to qualify a new supplier ranging from 1 to 120 days. No purchasers reported that a domestic or foreign supplier had failed in its attempt to qualify CWP or had lost its approved status since 2016.

Minimum quality specifications

As can be seen from table II-10, most responding purchasers reported that domestically produced product always met minimum quality specifications, while most reported that they did not know whether subject product from Oman, Pakistan, or the UAE met minimum quality specifications. Among the purchasers that did, most reported that CWP from Oman always met minimum quality specification, while most reported that CWP from the UAE usually did.

Table II-10
CWP: Count of purchasers' responses regarding suppliers' ability to meet minimum quality specifications, by source

Number of firms reporting

Source of purchases	Always	Usually	Sometimes	Rarely or never	Don't Know
United States	17	9	0	1	3
Oman	3	2	0	0	23
Pakistan	0	0	0	0	28
UAE	4	5	0	0	18
All other sources	10	9	0	1	7

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

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

When asked what characteristics they consider when evaluating the quality of CWP, the most frequently cited characteristic was the ability of the product to meet industry/ASTM standards and specifications. Other factors that purchasers cited included availability, chemistry tolerance, coating quality, consistency, dimension accuracy, gauge control, material certification, no corrosion or rust, overall appearance, reputation in the market, "re-saleability," straightness, surface quality, thread consistency, and weld quality/tolerance.

Changes in purchasing patterns

Purchasers were asked several questions about changes in their purchasing patterns from different sources before and since 2016. When asked whether they used to purchase CWP from the United States, Oman, Pakistan, and/or the UAE before 2016, most responding purchasers (27 of 30 firms) reported that they did. When asked if their pattern of purchasing CWP from each of these sources had changed since 2016, most reported that their pattern was essentially unchanged from the United States (24 of 26 firms), Oman (14 of 19 firms), Pakistan

(15 of 17 firms), the UAE (15 of 21 firms), and nonsubject sources (19 of 30 firms).¹⁸ Only one firm reported reducing purchases from Oman as a result of the antidumping and countervailing duty orders, while the remaining firms reported reducing purchases from all sources for reasons unrelated to the orders.

When asked to report how the shares of their firms' purchases of CWP from the United States, Oman, Pakistan, the UAE, nonsubject sources, and unknown sources had changed since January 1, 2016, firm's responses were mixed. A plurality of purchasers reported constant purchases of domestic product, while the next most reported increasing domestic purchases. Most firms reported that they had not purchased CWP from any of the subject countries since January 1, 2016. Of the firms that did purchase subject product since January 1, 2016, pluralities reported fluctuating purchases from Oman and Pakistan, while a plurality reported increasing purchases from the UAE. Pluralities reported fluctuating purchases from nonsubject and unknown source countries.

Table II-11
CWP: Count of purchasers' responses regarding changes in purchase patterns from U.S., subject, and nonsubject countries

Number of firms reporting

Source of purchases	Decreased	Increased	Constant	Fluctuated	Did not purchase
United States	3	8	11	7	0
Oman	2	1	1	3	15
Pakistan	0	0	0	1	21
UAE	3	4	1	3	12
All other countries	6	4	4	7	3
Unknown sources	3	1	2	6	11

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

Most responding purchasers (24 of 30 firms) also reported that they had not changed suppliers since January 1, 2016. Among the six purchasers that did, most reported adding suppliers for reasons related to availability and supply chain issues, delivery terms, the antidumping and countervailing duty orders, and pricing. Firms reported adding the Aldarra Overseas Group, Dynamic Metals, International Steel Trading, Kurt Orban Partners, Macsteel Exports, Mercadex, and Tubex. Only one purchaser reported dropping firms for reasons related to pricing, delivery terms, and availability; the firms that purchaser dropped included ***

¹⁸ Of the 30 responding purchasers, 28 purchased the domestic product, 5 purchased imports of the subject merchandise from Oman, none purchased imports of the subject merchandise from Pakistan, 8 purchased imports of the subject merchandise from the UAE, and 21 purchased imports of CWP from other sources.

***.

Purchase factor comparisons of domestic products, subject imports, and nonsubject imports

Purchasers were asked a number of questions comparing CWP produced in the United States, subject countries, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 18 factors, for which they were asked to rate the importance (table II-12).

When comparing domestic CWP and CWP from Oman and the UAE, purchasers rated them as comparable for most factors, while most purchasers rated the United States as superior to CWP from Pakistan on most factors. Most purchasers rated domestic CWP as superior to CWP from Oman on availability, delivery terms, delivery time, product consistency, and technical support/service. A plurality of purchasers rated the United States as inferior to Oman on price, while a plurality rated the U.S. and the UAE as comparable on price. A plurality of purchasers rated the U.S. as superior to CWP from the UAE on availability. When comparing U.S. and nonsubject CWP, a majority of purchasers rated them as comparable on all factors.

Table II-12
CWP: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	US v. Oman	6	2	1
Certified as lead-free	US v. Oman	0	3	0
Delivery terms	US v. Oman	4	2	0
Delivery time	US v. Oman	4	2	0
Discounts offered	US v. Oman	2	3	0
Extension of credit	US v. Oman	1	4	0
Grade of steel	US v. Oman	2	4	0
Minimum quantity requirements	US v. Oman	3	4	0
Packaging	US v. Oman	1	5	0
Payment terms	US v. Oman	2	4	0
Price	US v. Oman	2	2	3
Product consistency	US v. Oman	4	2	0
Product range	US v. Oman	2	4	0
Quality meets industry standards	US v. Oman	2	4	0
Quality exceeds industry standards	US v. Oman	2	4	0
Reliability of supply	US v. Oman	3	3	0
Technical support/service	US v. Oman	4	2	0
U.S. transportation costs	US v. Oman	2	5	0

Table continued.

Table II-12 Continued**CWP: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	US v. Pakistan	3	0	0
Certified as lead-free	US v. Pakistan	0	0	0
Delivery terms	US v. Pakistan	1	0	0
Delivery time	US v. Pakistan	1	0	0
Discounts offered	US v. Pakistan	0	0	0
Extension of credit	US v. Pakistan	0	0	0
Grade of steel	US v. Pakistan	1	0	0
Minimum quantity requirements	US v. Pakistan	0	1	0
Packaging	US v. Pakistan	1	0	0
Payment terms	US v. Pakistan	1	0	0
Price ¹	US v. Pakistan	0	1	0
Product consistency	US v. Pakistan	1	0	0
Product range	US v. Pakistan	1	0	0
Quality meets industry standards	US v. Pakistan	1	0	0
Quality exceeds industry standards	US v. Pakistan	1	0	0
Reliability of supply	US v. Pakistan	1	0	0
Technical support/service	US v. Pakistan	1	0	0
U.S. transportation costs	US v. Pakistan	0	1	0

Table continued.

Table II-12 Continued**CWP: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	US v. UAE	6	5	1
Certified as lead-free	US v. UAE	0	6	0
Delivery terms	US v. UAE	4	5	0
Delivery time	US v. UAE	4	5	0
Discounts offered	US v. UAE	2	6	0
Extension of credit	US v. UAE	1	7	0
Grade of steel	US v. UAE	2	7	0
Minimum quantity requirements	US v. UAE	1	9	0
Packaging	US v. UAE	1	8	0
Payment terms	US v. UAE	2	6	0
Price	US v. UAE	3	5	3
Product consistency	US v. UAE	3	6	0
Product range	US v. UAE	1	8	0
Quality meets industry standards	US v. UAE	1	8	0
Quality exceeds industry standards	US v. UAE	0	9	0
Reliability of supply	US v. UAE	2	7	0
Technical support/service	US v. UAE	3	6	0
U.S. transportation costs	US v. UAE	2	7	1

Table continued.

Table II-12 Continued**CWP: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	US v. Nonsubject	6	15	1
Certified as lead-free	US v. Nonsubject	1	11	0
Delivery terms	US v. Nonsubject	6	12	0
Delivery time	US v. Nonsubject	8	11	0
Discounts offered	US v. Nonsubject	4	12	0
Extension of credit	US v. Nonsubject	2	16	0
Grade of steel	US v. Nonsubject	3	14	0
Minimum quantity requirements	US v. Nonsubject	4	15	0
Packaging	US v. Nonsubject	2	17	0
Payment terms	US v. Nonsubject	4	13	0
Price	US v. Nonsubject	3	10	6
Product consistency	US v. Nonsubject	3	15	0
Product range	US v. Nonsubject	2	17	0
Quality meets industry standards	US v. Nonsubject	2	17	0
Quality exceeds industry standards	US v. Nonsubject	3	16	0
Reliability of supply	US v. Nonsubject	5	15	0
Technical support/service	US v. Nonsubject	8	11	0
U.S. transportation costs	US v. Nonsubject	4	13	1

Table continued.

Table II-12 Continued**CWP: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	Oman vs. Pakistan	0	0	0
Certified as lead-free	Oman vs. Pakistan	0	0	0
Delivery terms	Oman vs. Pakistan	0	0	0
Delivery time	Oman vs. Pakistan	0	0	0
Discounts offered	Oman vs. Pakistan	0	0	0
Extension of credit	Oman vs. Pakistan	0	0	0
Grade of steel	Oman vs. Pakistan	0	0	0
Minimum quantity requirements	Oman vs. Pakistan	0	0	0
Packaging	Oman vs. Pakistan	0	0	0
Payment terms	Oman vs. Pakistan	0	0	0
Price	Oman vs. Pakistan	0	0	0
Product consistency	Oman vs. Pakistan	0	0	0
Product range	Oman vs. Pakistan	0	0	0
Quality meets industry standards	Oman vs. Pakistan	0	0	0
Quality exceeds industry standards	Oman vs. Pakistan	0	0	0
Reliability of supply	Oman vs. Pakistan	0	0	0
Technical support/service	Oman vs. Pakistan	0	0	0
U.S. transportation costs	Oman vs. Pakistan	0	0	0

Table continued.

Table II-12 Continued**CWP: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	Oman vs. UAE	0	6	0
Certified as lead-free	Oman vs. UAE	0	4	0
Delivery terms	Oman vs. UAE	0	6	0
Delivery time	Oman vs. UAE	0	6	0
Discounts offered	Oman vs. UAE	0	6	0
Extension of credit	Oman vs. UAE	0	5	1
Grade of steel	Oman vs. UAE	0	6	0
Minimum quantity requirements	Oman vs. UAE	0	6	0
Packaging	Oman vs. UAE	0	6	0
Payment terms	Oman vs. UAE	0	5	1
Price	Oman vs. UAE	0	6	0
Product consistency	Oman vs. UAE	0	6	0
Product range	Oman vs. UAE	0	5	1
Quality meets industry standards	Oman vs. UAE	0	6	0
Quality exceeds industry standards	Oman vs. UAE	0	5	0
Reliability of supply	Oman vs. UAE	1	5	0
Technical support/service	Oman vs. UAE	0	6	0
U.S. transportation costs	Oman vs. UAE	0	6	0

Table continued.

Table II-12 Continued**CWP: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	Pakistan vs. UAE	0	0	0
Certified as lead-free	Pakistan vs. UAE	0	0	0
Delivery terms	Pakistan vs. UAE	0	0	0
Delivery time	Pakistan vs. UAE	0	0	0
Discounts offered	Pakistan vs. UAE	0	0	0
Extension of credit	Pakistan vs. UAE	0	0	0
Grade of steel	Pakistan vs. UAE	0	0	0
Minimum quantity requirements	Pakistan vs. UAE	0	0	0
Packaging	Pakistan vs. UAE	0	0	0
Payment terms	Pakistan vs. UAE	0	0	0
Price	Pakistan vs. UAE	0	0	0
Product consistency	Pakistan vs. UAE	0	0	0
Product range	Pakistan vs. UAE	0	0	0
Quality meets industry standards	Pakistan vs. UAE	0	0	0
Quality exceeds industry standards	Pakistan vs. UAE	0	0	0
Reliability of supply	Pakistan vs. UAE	0	0	0
Technical support/service	Pakistan vs. UAE	0	0	0
U.S. transportation costs	Pakistan vs. UAE	0	0	0

Table continued.

Table II-12 Continued**CWP: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	Oman vs. Nonsubject	0	4	1
Certified as lead-free	Oman vs. Nonsubject	1	2	0
Delivery terms	Oman vs. Nonsubject	0	4	1
Delivery time	Oman vs. Nonsubject	0	4	1
Discounts offered	Oman vs. Nonsubject	0	5	0
Extension of credit	Oman vs. Nonsubject	0	4	1
Grade of steel	Oman vs. Nonsubject	0	5	0
Minimum quantity requirements	Oman vs. Nonsubject	0	5	0
Packaging	Oman vs. Nonsubject	1	4	0
Payment terms	Oman vs. Nonsubject	0	4	1
Price	Oman vs. Nonsubject	1	4	0
Product consistency	Oman vs. Nonsubject	1	4	0
Product range	Oman vs. Nonsubject	0	4	1
Quality meets industry standards	Oman vs. Nonsubject	0	5	0
Quality exceeds industry standards	Oman vs. Nonsubject	0	5	0
Reliability of supply	Oman vs. Nonsubject	0	5	0
Technical support/service	Oman vs. Nonsubject	0	4	1
U.S. transportation costs	Oman vs. Nonsubject	0	5	0

Table continued.

Table II-12 Continued**CWP: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	Pakistan vs. Nonsubject	0	0	0
Certified as lead-free	Pakistan vs. Nonsubject	0	0	0
Delivery terms	Pakistan vs. Nonsubject	0	0	0
Delivery time	Pakistan vs. Nonsubject	0	0	0
Discounts offered	Pakistan vs. Nonsubject	0	0	0
Extension of credit	Pakistan vs. Nonsubject	0	0	0
Grade of steel	Pakistan vs. Nonsubject	0	0	0
Minimum quantity requirements	Pakistan vs. Nonsubject	0	0	0
Packaging	Pakistan vs. Nonsubject	0	0	0
Payment terms	Pakistan vs. Nonsubject	0	0	0
Price	Pakistan vs. Nonsubject	0	0	0
Product consistency	Pakistan vs. Nonsubject	0	0	0
Product range	Pakistan vs. Nonsubject	0	0	0
Quality meets industry standards	Pakistan vs. Nonsubject	0	0	0
Quality exceeds industry standards	Pakistan vs. Nonsubject	0	0	0
Reliability of supply	Pakistan vs. Nonsubject	0	0	0
Technical support/service	Pakistan vs. Nonsubject	0	0	0
U.S. transportation costs	Pakistan vs. Nonsubject	0	0	0

Table continued.

Table II-12 Continued**CWP: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	UAE vs. Nonsubject	0	8	0
Certified as lead-free	UAE vs. Nonsubject	1	5	0
Delivery terms	UAE vs. Nonsubject	0	8	0
Delivery time	UAE vs. Nonsubject	0	8	0
Discounts offered	UAE vs. Nonsubject	0	8	0
Extension of credit	UAE vs. Nonsubject	0	8	0
Grade of steel	UAE vs. Nonsubject	0	8	0
Minimum quantity requirements	UAE vs. Nonsubject	0	8	0
Packaging	UAE vs. Nonsubject	1	7	0
Payment terms	UAE vs. Nonsubject	0	8	0
Price	UAE vs. Nonsubject	0	8	0
Product consistency	UAE vs. Nonsubject	1	7	0
Product range	UAE vs. Nonsubject	0	7	1
Quality meets industry standards	UAE vs. Nonsubject	0	8	0
Quality exceeds industry standards	UAE vs. Nonsubject	0	8	0
Reliability of supply	UAE vs. Nonsubject	0	8	0
Technical support/service	UAE vs. Nonsubject	0	8	0
U.S. transportation costs	UAE vs. Nonsubject	0	7	1

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

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

Comparison of U.S.-produced and imported CWP

In order to determine whether U.S.-produced CWP can generally be used in the same applications as imports from the subject countries, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. All producers and a plurality of purchasers rated CWP as always interchangeable for each country comparison (tables II-13 and II-15). Half of the responding importers rated domestic CWP as always interchangeable with CWP from Oman and Pakistan, while three importers each rated domestic CWP and CWP from the UAE as frequently and sometimes interchangeable (table II-14).

Table II-13**CWP: Count of U.S. producers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. Oman	5	0	0	0
U.S. vs. Pakistan	5	0	0	0
U.S. vs. UAE	5	0	0	0
Oman vs. Pakistan	4	0	0	0
Oman vs. UAE	4	0	0	0
Pakistan vs. UAE	4	0	0	0
U.S. vs. Other	4	0	0	0
Oman vs. Other	3	0	0	0
Pakistan vs. Other	3	0	0	0
UAE vs. Other	3	0	0	0

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

Table II-14**CWP: Count of importers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. Oman	2	1	1	0
U.S. vs. Pakistan	2	1	1	0
U.S. vs. UAE	2	3	3	0
Oman vs. Pakistan	2	1	0	0
Oman vs. UAE	2	3	0	0
Pakistan vs. UAE	2	3	0	0
U.S. vs. Other	2	5	1	0
Oman vs. Other	2	1	0	0
Pakistan vs. Other	2	1	0	0
UAE vs. Other	2	3	0	0

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

Table II-15
CWP: Count of purchasers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. Oman	6	4	2	1
U.S. vs. Pakistan	4	2	1	1
U.S. vs. UAE	7	3	2	1
Oman vs. Pakistan	3	0	0	0
Oman vs. UAE	6	3	0	0
Pakistan vs. UAE	3	2	1	0
U.S. vs. Other	9	6	5	1
Oman vs. Other	6	4	0	0
Pakistan vs. Other	3	2	1	0
UAE vs. Other	6	3	1	0

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

In additional comments, three purchasers reported that Canadian product can sometimes be interchangeable with domestic CWP, with two firms indicating that “some industry standards have different designations but similar requirements.” One purchaser reported that it has used Chinese CWP but has had some issues with metric sizing, while another (***) reported that “many users do not accept products from Pakistan because of poor quality.” One purchaser also stated that even when customers have source requirements, whether domestic or import, “sometimes the opposite can be used during shortage periods.”

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of CWP from the United States, subject, or nonsubject countries. While most U.S. producers reported that differences other than price were never significant when comparing U.S. and subject product (the rest reported that they are sometimes significant), importer and purchaser responses were more mixed. Among importers, when comparing U.S. to Omani CWP and U.S. to Pakistani CWP, half of the responding firms rated differences other than price as sometimes significant. When comparing domestic CWP to CWP from the UAE, three importers each rated differences other than prices as always and sometimes significant. When comparing U.S. to nonsubject CWP, two importers each rated differences other than price as always, frequently, and sometimes significant, while one firm rated them as never significant. Among purchasers, a plurality reported that differences other than price were always significant when comparing U.S. CWP to CWP from all the subject sources. When comparing U.S. to nonsubject CWP, a plurality of purchasers rated differences other than price as sometimes significant.

Table II-16**CWP: 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**

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. Oman	0	0	2	3
U.S. vs. Pakistan	0	0	2	3
U.S. vs. UAE	0	0	2	3
Oman vs. Pakistan	0	0	1	2
Oman vs. UAE	0	0	1	2
Pakistan vs. UAE	0	0	1	2
United States vs. Other	0	0	3	1
Oman vs. Other	0	0	1	1
Pakistan vs. Other	0	0	1	1
UAE vs. Other	0	0	1	1

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

Table II-17**CWP: Count of importers reporting the significance of differences between product produced in the United States and in other countries, by country pair**

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. Oman	1	0	2	1
U.S. vs. Pakistan	1	0	2	1
U.S. vs. UAE	3	1	3	1
Oman vs. Pakistan	1	0	1	1
Oman vs. UAE	3	0	1	1
Pakistan vs. UAE	3	0	1	1
United States vs. Other	2	2	2	1
Oman vs. Other	1	0	1	1
Pakistan vs. Other	1	0	1	1
UAE vs. Other	3	0	1	1

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

Table II-18**CWP: Count of purchasers reporting the significance of differences between product produced in the United States and in other countries, by country pair**

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. Oman	4	2	3	3
U.S. vs. Pakistan	3	1	1	2
U.S. vs. UAE	5	2	3	3
Oman vs. Pakistan	1	0	0	2
Oman vs. UAE	1	1	2	3
Pakistan vs. UAE	0	0	0	3
United States vs. Other	4	3	8	5
Oman vs. Other	1	3	2	2
Pakistan vs. Other	0	1	0	2
UAE vs. Other	1	2	3	3

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

In additional comments, two purchasers cited lead time and supply chain as important non-price factors, with one stating that lead times from China are “very long” and that “unloading containers is difficult and can be unsafe,” while another stated that domestic partners provide critically important reliability with a consistent supply chain. Another firm stated that product from Oman and Pakistan are similar in quality, while another (***) reiterated its concerns about quality in CWP from Pakistan.

Elasticity estimates¹⁹

U.S. supply elasticity

The domestic supply elasticity for CWP measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of CWP. The elasticity of domestic supply depends on several factors including the level of excess capacity, the ease with which producers can alter capacity, producers’ ability to shift to production of other products, the existence of inventories, and the availability of alternate markets for U.S.-produced CWP. Analysis of these factors above indicates that the U.S. industry has the ability to measurably increase or decrease shipments to the U.S. market; an estimate in the range of 4 to 8 is suggested.

¹⁹ No party submitted comments on staff’s elasticity estimates.

U.S. demand elasticity

The U.S. demand elasticity for CWP measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of CWP. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the CWP in the production of any downstream products. Based on the available information, the aggregate demand for CWP is likely to be moderately inelastic; a range of -0.3 to -0.75 is suggested.

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.²⁰ Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). Based on available information, the elasticity of substitution between U.S.-produced CWP and imported CWP is likely to be in the range of 3 to 5. Firm responses suggest similarities between domestically produced CWP and CWP imported from subject countries across multiple purchase factors, interchangeability between domestic and subject sources, limited significant factors other than price, limited (albeit some) domestic content requirements, and similar types of CWP being available from both domestic and subject sources. However, firm responses suggest some preference for domestic product due to availability and lead times advantages and/or firm or customer preference.

²⁰ The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the subject imports and the domestic like products to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the subject products (or vice versa) when prices change.

Part III: Condition of the U.S. industry

Overview

The information in this section of the report was compiled from responses to the Commission’s questionnaires. Seven firms, which accounted for the majority of U.S. production of CWP during 2021, supplied information on their operations in these reviews and other proceedings on CWP.¹

Since the original investigations, Nucor Corporation, one of the leading domestic producers of hot-rolled sheet steel, a primary input used to produce CWP, has increased its pipe and tube production capacity through the acquisitions of companies that make up the Nucor Tubular Products group. Nucor Tubular Products consists of the Independence Tube Corporation (acquired in October 2016), Southland Tube, Inc. (acquired in January 2017), Republic Conduit (acquired in January 2017), and the assets of Century Tube, LLC (acquired in December 2018). Nucor also acquired majority ownership of California Steel Industries, Inc. in February 2022. The firms acquired since 2016 operate eight pipe and tube mills producing or capable of producing CWP (see table III-1 for details).²

Additionally, certain U.S. imports of hot-rolled steel became subject to additional duties or import quotas. Since October 2016, U.S. imports of hot-rolled steel flat products (hot-rolled steel) from Australia, Brazil, Japan, Korea, the Netherlands, the Republic of Turkey, and the United Kingdom, have been subject to antidumping and countervailing duties.³ Effective on March 23, 2018, U.S. imports of hot-rolled steel originating in certain countries are subject to an additional 25 percent ad valorem duty or tariff rate quotas under Section 232 of the Trade Expansion Act of 1962, as amended.⁴ Finally, as of September 1, 2019, U.S. imports of hot-rolled

¹ Staff’s assessment is based on a comparison of which firms responded in these reviews to the firms listed as being potential domestic producers of circular welded pipe by domestic parties in their responses to the notices of institution in the adequacy phase of these reviews, and in the 2018-19 second review for circular welded carbon-quality steel pipe from China (Inv. Nos. 701-TA-447 and 731-TA-1116).

² Nucor, “Pipe and Tube,” <https://www.nucor.com/products/Pipe-and-Tube/>. Nucor Tubular Products, “About Us,” <https://www.nucortubular.com/company/about-us/>. Nucor’s 2018 Form 10-K, p. 2 (as filed).

³ USITC, “Research Tools, Antidumping and Countervailing Duty Orders in Place,” January 18, 2022, https://www.usitc.gov/sites/default/files/trade_remedy/documents/orders.xls.

⁴ As discussed in the section of this report entitled “Tariff treatment” in part I.

steel originating in China are subject to an additional 7.5 percent ad valorem duty under Section 301 of the Trade Act of 1974, as amended.⁵

Table III-1 presents events in the U.S. industry since the original investigations.

Table III-1
Circular welded pipe: Recent developments in the U.S. industry

Item	Firm	Event
Acquisition/ expansion	Bull Moose	July 2016— Bull Moose announced that it had purchased additional sprinkler pipe mills that were incorporated into its existing sprinkler-pipe manufacturing operations at two of its existing locations: The first of these mills was scheduled to be added to Bull Moose’s operations in Trenton, Georgia, later in 2016, representing the company’s first sprinkler manufacturing mill in the Southeast. The second mill was scheduled to be added to the company’s existing operations in Casa Grande, Arizona, after the mill in Trenton, Georgia was completed, to service customers on the West Coast. With the addition of these two mills, coupled with investments made in the fall of 2015, Bull Moose effectively doubled its sprinkler pipe output capabilities.
Acquisition	Nucor	October 2016— Nucor Corporation acquired Independence Tube Corporation (“ITC”), a leading independent manufacturer of hollow structural section (“HSS”) steel tubing, for \$435 million. ITC operated four facilities in Illinois and Alabama that annually produced about 600,000 short tons of HSS tubing and employed approximately 335 teammates. ITC purchased hot-rolled coil from suppliers to produce its HSS steel tubing and its manufacturing plants are located close to Nucor’s sheet mills in Alabama, Indiana, and Kentucky.
Acquisition	Zekelman	February 2017— Zekelman acquired Western Tube & Conduit Corp. (Long Beach, CA). Western Tube & Conduit Corp. produces electrical, fence and mechanical tubing for customers in the western half of the United States.
Capital Investment	Maruichi Leavitt	2018— Maruichi Leavitt started operations at a new mechanical tube mill in Chicago, Illinois. The new mill replaced two legacy mills at the same site and is capable of producing a range of pipe and tube products.

Table continued.

⁵ As discussed in the section of this report entitled “Tariff treatment” in part I.

Table III-1 Continued
Circular welded pipe: Recent developments in the U.S. industry

Item	Firm	Event
Capital Investment	Bull Moose	January 2021— Bull Moose announced completion of major capital investment projects at its two largest tubular facilities in Elkhart, Indiana and Trenton, Georgia. The multi-million-dollar investments in new high-performance equipment were for optimizing both facilities’ operational capabilities. The projects involved upgrades to the drive and automation control system, installation of a new induction unit, upgrades to the sizing section of the mill, and upgraded cutoff quality and length accuracy capabilities. According to the company, the upgrades will enhance product quality, increase production efficiency and reliability, and add operational flexibility.
Expansion (under development)	Nucor	March 2021— Nucor announced that it plans to build a new tube mill on the site of its Nucor Steel Gallatin sheet mill in Kentucky. This location will allow the company to take advantage of its prior investments to expand production capacity of the Gallatin mill. The \$164 million mill is scheduled to be operational by the middle of 2023 and to create more than 70 new full-time jobs. This new tube mill will have the capacity to produce approximately 250,000 short tons of hollow structural section (HSS) steel tubing, mechanical steel tubing, and galvanized solar torque tube.
Capital Investment (under development)	Wheatland	May 2021— Wheatland Tube Co. (a subsidiary of Zekelman) announced plans to build a \$30 million fully automated warehouse at its Wheatland Tube facility in Warren, Ohio. The 83,000-square foot warehouse is scheduled to begin operating in December 2022. The new warehouse will convey pipe from the production lines of the manufacturing facility into the warehouse storage system and “will significantly increase safety and shipping capacity.”
Expansion (under development)	Bull Moose	June 2021— Bull Moose announced plans to build a 350,000 short tons per year hollow structural steel (“HSS”) and sprinkler pipe mill. The mill will be built on Steel Dynamics’ new Sinton, Texas, flat-rolled campus. The new mill will produce square pipe ranging in size from 4 to 14 inches and round pipe ranging from 5 to 18 inches in diameter, up to 80 feet in length, and thicknesses ranging from 0.187 to 0.750 inches. According to Bull Moose, the new plant will allow it to better serve customers in the Southwest, West Coast, and Mexican markets, as well as across the entire business region.
Expansion (under development)	Nova Tube & Steel, LLC	July 2021— Nova Tube & Steel LLC (an entity of Nova Steel Inc.) will install two new electric-resistance welding tube mills in Delta, Ohio. The mills will produce hollow structural sections and standard pipe for customers in construction and infrastructure, mining, solar energy, and defense industries. The first of the mills is scheduled to open in the summer of 2022.

Table continued.

Table III-1 Continued
Circular welded pipe: Recent developments in the U.S. industry

Item	Firm	Event
Expansion (under development)	Lock Joint Tube	December 2021— Lock Joint Tube, a mechanical grade steel tubing manufacturer based in Indiana, with production locations in Ohio, Tennessee, and Texas, announced plans to expand its tube mill in Temple, Texas. Lock Joint Tube plans to expand its footprint by 37,500 square feet pending final negotiations with the city and county. This \$21 million investment will double the tube production capacity at the mill.
Acquisition	PTC Alliance LLC/Metal- Matic, Inc.	December 2021— PTC Alliance LLC agreed to purchase certain operations of Metal-Matic, Inc., “a global leader in the production of welded and drawn over mandrel carbon steel tubing for standard and specialty applications.” This transaction includes four production facilities with over 500 employees in Illinois, Minnesota, and Ohio and is scheduled to be completed by the end of 2021.
Acquisition	Nucor	February 2022—Nucor acquired a majority ownership position in California Steel Industries, Inc. (CSI) by purchasing a 50 percent equity interest in CSI for \$400 million and 1 percent stake from JFE Steel Corporation. CSI is a flat-rolled steel converter with the capability to produce more than two million short tons of finished steel and steel mill products annually. The company has five product lines, including hot-rolled, pickled and oiled, cold rolled, galvanized, and electric resistance welded (ERW) pipe.

Source: Bull Moose Tube Company, “Purchase of Mill Equipment Furthers Bull Moose Tube’s Investment Strategy in Sprinkler Pipe, Ensures Company Will Continue to Meet Industry Demand,” July 12, 2016, <https://www.bullmoosetube.com/bull-moose-tube-acquires-sprinkler-pipe-assets/>. Nucor Corporation, “Nucor Completes Acquisition of Independence Tube Corporation,” November 1, 2016, <https://nucor.com/news-release/10061>. Maruichi Leavitt Pipe & Tube, “About Maruichi Leavitt: History,” <https://www.maruichi-leavitt.com/about-maruichi-leavitt.html>. Zekelman Industries, “Zekelman Industries completes acquisition of Western Tube & Conduit Corporation,” February 15, 2017. Bull Moose Tube Company, “Bull Moose Tube Announces Completion of Capital Investment Upgrades at its Two Largest Facilities,” January 12, 2021, <https://www.bullmoosetube.com/bull-moose-tube-announces-completion-of-capital-investment-upgrades-at-its-two-largest-facilities/>. Nucor Corporation, “Nucor to Build New Tube Mill in Kentucky near its Gallatin Sheet Mill,” March 25, 2021, <https://www.nucor.com/news-release/#item=17871>. Zekelman Industries, “Zekelman Industries Plans a Fully Automated Warehouse in Warren, OH, for Wheatland Tube,” May 28, 2021, <https://www.zekelman.com/news/zekelman-industries-plans-a-fully-automated-warehouse-in-warren-oh-for-wheatland-tube/>. Bull Moose Tube Company, “Bull Moose Tube Announces Plans to Construct a New HSS and Sprinkler Pipe Mill in Sinton, Texas,” June 4, 2021, <https://www.bullmoosetube.com/bull-moose-tube-announces-plans-to-construct-a-new-hss-and-sprinkler-pipe-mill-in-sinton-texas/>. Nova Steel, “Announcing Delta, Ohio Tube Mills—Summer 2022,” July 2021, <https://novasteelcorp.com/blog/news/nova-tube-delta-ohio-tube-mill/>. Temple Economic Development Corporation, “Lock Joint Tube to Expand in Temple, Texas,” December 17, 2021, <https://templeedc.com/lock-joint-tube-to-expand-in-temple-texas/>. PTC Alliance LLC, “PTC Alliance LLC Announces Purchase of Metal-Matic, Inc.’s Business,” December 17, 2021, <https://ptcalliance.com/ptca-news/ptc-alliance-llc-announces-purchase-of-metal-matic-inc-s-business/>. Nucor Corporation, “Nucor Completes Acquisition of California Steel Industries,” February 2, 2022, [Nucor | Nucor Completes Acquisition of California Steel Industries](https://www.nucor.com/news/nucor-completes-acquisition-of-california-steel-industries).

Changes experienced by the industry

Domestic producers were asked to indicate whether their firm had experienced any plant openings, relocations, expansions, acquisitions, consolidations, closures, or prolonged shutdowns because of strikes or equipment failure; curtailment of production because of shortages of materials or other reasons, including revision of labor agreements; or any other change in the character of their operations or organization relating to the production of CWP since January 1, 2016. Five of the seven domestic producers which provided responses in these reviews indicated that they had experienced such changes; their responses are presented in table III-2.

Table III-2
CWP: U.S. producers' reported changes in operations since January 1 2016, by type of change and firm

Type of change	Firm name and narrative on changes in operations
Plant openings	***
Expansions	***
Expansions	***
Expansions	***
Acquisitions	***

Table continued.

Table III-2 Continued

CWP: U.S. producers' reported changes in operations since January 1 2016, by type of change and firm

Type of change	Firm name and narrative on changes in operations
Acquisitions	***
Acquisitions	***
Acquisitions	***
Prolonged shutdowns or curtailments	***
Prolonged shutdowns or curtailments	***
Prolonged shutdowns or curtailments	***
Revised labor agreements	***
Revised labor agreements	***
Other	***

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

Anticipated changes in operations

The Commission asked domestic producers to report anticipated changes in the character of their operations relating to the production of CWP. Their responses appear in table III-3.

Table III-3
CWP: Anticipated changes in operations

Firm	Narrative on anticipated changes in operations
***	*** .
***	*** .
***	*** .
***	*** .

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

U.S. production, capacity, and capacity utilization

Table III-4 presents U.S. producers' production, capacity, and capacity utilization. U.S. producers' combined capacity increased irregularly⁶ by 6.6 percent during 2016-21 and was 4.5 percent higher during January-June ("interim") 2022 compared to interim 2021.⁷ ⁸ U.S. producers' combined production increased by 6.1 percent during 2016-21 but was 1.6 percent lower during interim 2022 compared to interim 2021. Combined capacity utilization decreased by 0.3 percentage points during 2016-21 but was 4.2 percentage points lower during interim 2022 compared to interim 2021.

⁶ ***.

Additionally, ***.

⁷ *** firm reported increases in capacity from 2016 to 2021, except for ***. ***.

***.

⁸ Over the period examined the largest increase in U.S. producer's reported capacity occurred between 2016 and 2017 and was largely due to ***.

Table III-4
CWP: Firm-by-firm capacity, by period

Quantity in short tons		Capacity		
Firm	2016	2017	2018	
Atlas Tube	***	***	***	
Bull Moose	***	***	***	
CSI	***	***	***	
EXLTUBE	***	***	***	
Maruichi	***	***	***	
Nucor	***	***	***	
Wheatland	***	***	***	
All firms	1,503,724	1,570,888	1,544,415	

Table continued.

Table III-4 Continued
CWP: Firm-by-firm capacity, by period

Quantity in short tons		Capacity			
Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	1,564,371	1,581,769	1,602,677	793,159	828,788

Table continued.

Table III-4 Continued
CWP: Firm-by-firm production, by period

Quantity in short tons		Production		
Firm	2016	2017	2018	
Atlas Tube	***	***	***	
Bull Moose	***	***	***	
CSI	***	***	***	
EXLTUBE	***	***	***	
Maruichi	***	***	***	
Nucor	***	***	***	
Wheatland	***	***	***	
All firms	1,016,201	1,030,736	1,059,877	

Table continued.

Table III-4 Continued
CWP: Firm-by-firm production, by period

Production

Quantity in short tons

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	1,115,082	1,089,586	1,078,306	577,061	568,024

Table continued.

Table III-4 Continued
CWP: Firm-by-firm capacity utilization, by period

Capacity utilization

Ratio in percent

Firm	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	67.6	65.6	68.6

Table continued.

Table III-4 Continued
CWP: Firm-by-firm capacity utilization, by period

Capacity utilization

Ratio in percent

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	71.3	68.9	67.3	72.8	68.5

Table continued.

Table III-4 Continued
CWP: Firm-by-firm share of production, by period

Share of production

Share in percent

Firm	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	100.0	100.0	100.0

Table continued.

Table III-4 Continued
CWP: Firm-by-firm share of production, by period

Share of production

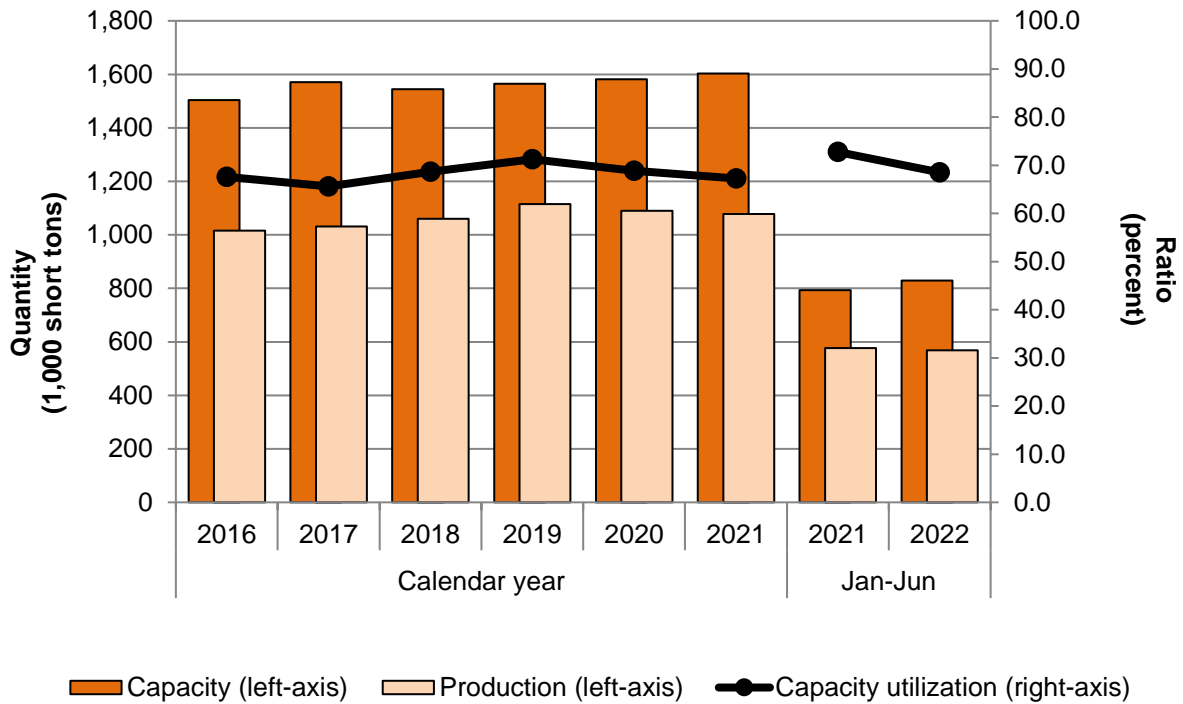
Share in percent

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
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.

Figure III-1
CWP: U.S. producers' production, capacity, and capacity utilization, by period



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

Alternative products

As shown in table III-5, CWP accounted for between 34.9 and 42.5 percent of total production on shared equipment during 2016-21 and January-June 2022. In 2016, CWP constituted its highest share of overall production in any period at 42.5 percent, but constituted a smaller share (roughly 35-40 percent per period) of overall production in all other periods. Every firm reported producing out-of-scope merchandise using the same equipment as subject production in every period except for ***.

Table III-5**CWP: U.S. producers' overall capacity and production on the same equipment as subject production, by period**

Quantity in short tons; ratio and share in percent

Item	Measure	2016	2017	2018
Overall capacity	Quantity	3,706,518	4,300,639	4,352,902
Production: CWP	Quantity	1,016,201	1,030,736	1,059,877
Production: Line pipe <=16 OD	Quantity	***	***	***
Production: Line pipe >16 OD	Quantity	***	***	***
Production: Mechanical tubing	Quantity	***	***	***
Production: OCTG	Quantity	***	***	***
Production: Other products	Quantity	***	***	***
Production: All out-of-scope products	Quantity	1,375,533	1,722,722	1,977,254
Production: All products	Quantity	2,391,734	2,753,458	3,037,131
Overall capacity utilization	Ratio	64.5	64.0	69.8
Production: CWP	Share	42.5	37.4	34.9
Production: Line pipe <=16 OD	Share	***	***	***
Production: Line pipe >16 OD	Share	***	***	***
Production: Mechanical tubing	Share	***	***	***
Production: OCTG	Share	***	***	***
Production: Other products	Share	***	***	***
Production: All out-of-scope products	Share	57.5	62.6	65.1
Production: All products	Share	100.0	100.0	100.0

Table continued.

Table III-5 Continued
CWP: U.S. producers' overall capacity and production on the same equipment as subject production, by period

Quantity in short tons; ratio and share in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Overall capacity	Quantity	4,372,241	4,396,905	4,468,740	2,222,341	2,416,841
Production: CWP	Quantity	1,115,082	1,089,586	1,078,306	577,061	568,024
Production: Line pipe <=16 OD	Quantity	***	***	***	***	***
Production: Line pipe >16 OD	Quantity	***	***	***	***	***
Production: Mechanical tubing	Quantity	***	***	***	***	***
Production: OCTG	Quantity	***	***	***	***	***
Production: Other products	Quantity	***	***	***	***	***
Production: All out-of-scope products	Quantity	1,954,825	1,699,360	1,688,268	879,544	849,119
Production: All products	Quantity	3,069,907	2,788,946	2,766,574	1,456,605	1,417,143
Overall capacity utilization	Ratio	70.2	63.4	61.9	65.5	58.6
Production: CWP	Share	36.3	39.1	39.0	39.6	40.1
Production: Line pipe <=16 OD	Share	***	***	***	***	***
Production: Line pipe >16 OD	Share	***	***	***	***	***
Production: Mechanical tubing	Share	***	***	***	***	***
Production: OCTG	Share	***	***	***	***	***
Production: Other products	Share	***	***	***	***	***
Production: All out-of-scope products	Share	63.7	60.9	61.0	60.4	59.9
Production: All products	Share	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.

Constraints on capacity

All responding U.S. producers reported constraints in the manufacturing process. ***.

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

Table III-6 presents U.S. producers' U.S. shipments, export shipments, and total shipments. U.S. shipments increased irregularly by 7.9 percent during 2016-21 but were 1.8 percent lower during interim 2022 compared to interim 2021. Export shipments decreased by *** percent during 2016-21 and were *** percent lower during interim 2022 compared to interim 2021, however the share of total shipments accounted for by export shipments did not exceed *** percent in any period.⁹

Table III-6
CWP: U.S. producers' shipments, by destination and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; shares in percent

Item	Measure	2016	2017	2018
U.S. shipments	Quantity	974,885	1,001,532	1,026,549
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
U.S. shipments	Value	839,541	972,321	1,228,996
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***
U.S. shipments	Unit value	861	971	1,197
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
U.S. shipments	Share of quantity	***	***	***
Export shipments	Share of quantity	***	***	***
Total shipments	Share of quantity	***	***	***
U.S. shipments	Share of value	***	***	***
Export shipments	Share of value	***	***	***
Total shipments	Share of value	***	***	***

Table continued.

⁹ The majority of U.S. shipments in every period were of commercial U.S. shipments, ranging from *** to *** in every period from 2016-21. The share of U.S. shipments which were commercial shipments was *** percent in interim 2022.

Table III-6 Continued
CWP: U.S. producers' U.S. shipments, by destination and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; shares in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
U.S. shipments	Quantity	1,110,373	1,069,687	1,052,079	562,686	552,763
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	1,130,275	1,002,365	1,980,040	881,974	1,100,295
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	1,018	937	1,882	1,567	1,991
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
U.S. shipments	Share of quantity	***	***	***	***	***
Export shipments	Share of quantity	***	***	***	***	***
Total shipments	Share of quantity	***	***	***	***	***
U.S. shipments	Share of value	***	***	***	***	***
Export shipments	Share of value	***	***	***	***	***
Total shipments	Share of value	***	***	***	***	***

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

U.S. producers' inventories

Table III-7 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. U.S. producers' inventories increased irregularly by 44.6 percent during 2016-21 and were 5.7 percent higher during interim 2022 compared to interim 2021.¹⁰ The ratio of U.S. producers' inventories to U.S. production ranged between 8.3 percent and 12.6 percent during 2016-21 and interim 2022, while the ratio of U.S. producers' inventories to U.S. shipments ranged between 8.5 percent and 13.0 percent during the same time period.

¹⁰ The increase in inventories from 2017 to 2018 was attributable to ***.

Table III-7
CWP: U.S. producers' inventories and their ratio to select items, by period

Quantity in short tons; ratio in percent

Item	Measure	2016	2017	2018
End-of-period inventory	Quantity	86,200	85,176	133,428
Inventory to U.S. production	Ratio	8.5	8.3	12.6
Inventory to U.S. shipments	Ratio	8.8	8.5	13.0
Inventory to total shipments	Ratio	***	***	***

Table continued.

Table III-7 Continued
CWP: U.S. producers' inventories and their ratio to select items, by period

Quantity in short tons; ratio in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
End-of-period inventory	Quantity	124,995	120,981	124,658	120,934	127,799
Inventory to U.S. production	Ratio	11.2	11.1	11.6	10.5	11.2
Inventory to U.S. shipments	Ratio	11.3	11.3	11.8	10.7	11.6
Inventory to total shipments	Ratio	***	***	***	***	***

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

U.S. producers' imports from subject sources

As reported in Part I, no U.S. producers are related to foreign producers of the subject merchandise. In addition, no U.S. producers directly import the subject merchandise or purchase the subject merchandise from U.S. importers.

U.S. employment, wages, and productivity

Table III-8 shows U.S. producers' employment-related data. The number of PRWs reported by U.S. producers increased by 6.9 percent from 2016-21 and was 6.9 percent higher during interim 2022 compared to interim 2021. Wages paid increased by 38.5 percent during 2016-21 and were 8.7 percent higher during interim 2022 compared to interim 2021, while hourly wages increased by 29.3 percent during 2016-21 and were 6.2 percent higher during interim 2022 compared to interim 2021. Productivity however decreased by 0.9 percent from 2016-21 and was 3.9 percent lower in interim 2022 than in interim 2021.

Table III-8**CWP: U.S. producers' employment related information, by period**

Item	2016	2017	2018
Production and related workers (PRWs) (number)	1,800	1,855	1,893
Total hours worked (1,000 hours)	3,829	4,027	4,081
Hours worked per PRW (hours)	2,127	2,171	2,156
Wages paid (\$1,000)	120,085	124,270	143,824
Hourly wages (dollars per hour)	\$31.36	\$30.86	\$35.24
Productivity (short tons per 1,000 hours)	265.4	256.0	259.7
Unit labor costs (dollars per short ton)	\$118	\$121	\$136

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

Table III-8 Continued**CWP: U.S. producers' employment related information, by period**

Item	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Production and related workers (PRWs) (number)	1,909	1,876	1,925	1,900	2,031
Total hours worked (1,000 hours)	4,115	4,037	4,101	2,036	2,085
Hours worked per PRW (hours)	2,156	2,152	2,130	1,072	1,027
Wages paid (\$1,000)	145,899	160,752	166,303	78,352	85,186
Hourly wages (dollars per hour)	\$35.46	\$39.82	\$40.55	\$38.48	\$40.86
Productivity (short tons per 1,000 hours)	271.0	269.9	262.9	283.4	272.4
Unit labor costs (dollars per short ton)	\$131	\$148	\$154	\$136	\$150

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

Financial experience of U.S. producers

Background¹¹

Seven U.S. producers (Atlas Tube, Bull Moose, CSI, EXLTUBE, Maruichi, Nucor and Wheatland) provided usable financial results on their CWP operations. *** responding U.S. producers reported financial data on a calendar year and on a GAAP basis.^{12 13}

Figure III-2 presents each responding firm's share of the total reported net sales quantity in 2021.

¹¹ 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"), cost of goods sold ("COGS"), selling, general, and administrative expenses ("SG&A expenses"), average unit values ("AUVs"), research and development ("R&D"), and return on assets ("ROA").

¹² As previously mentioned, ***. Email from ***, August 29, and October 19, 2022, and U.S. producers' questionnaire response, section II-2a.

***. U.S. producers' questionnaire response, section II-2a, and Email from ***, September 15, and November 9, 2022.

¹³ ***. Email from ***, August 30, 2022.

Figure III-2
CWP: Share of net sales quantity in 2021, by firm

* * * * *

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

Operations on CWP

Table III-9 presents aggregated data on U.S. producers' operations in relation to CWP, while table III-10 presents corresponding changes in AUVs. Table III-11 presents selected company-specific financial data.

Table III-9
CWP: Results of operations of U.S. producers, by item and period

Quantity in short tons; value in 1,000 dollars; ratios in percent

Item	Measure	2016	2017	2018
Total net sales	Quantity	989,241	1,011,269	1,030,645
Total net sales	Value	847,916	978,021	1,231,459
COGS: Raw materials	Value	***	***	***
COGS: Direct labor	Value	***	***	***
COGS: Other factory	Value	***	***	***
COGS: Total	Value	***	***	***
Gross profit or (loss)	Value	***	***	***
SG&A expenses	Value	71,761	87,098	113,779
Operating income or (loss)	Value	***	***	***
All 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	8.5	8.9	9.2
Operating income or (loss)	Ratio to NS	***	***	***
Net income or (loss)	Ratio to NS	***	***	***

Table continued.

Table III-9 Continued
CWP: Results of operations of U.S. producers, by item and period

Quantity in short tons; value in 1,000 dollars; ratios in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Total net sales	Quantity	1,111,214	1,077,904	1,056,900	567,947	556,176
Total net sales	Value	1,129,771	1,008,043	1,987,661	889,989	1,101,075
COGS: Raw materials	Value	***	***	***	***	***
COGS: Direct labor	Value	***	***	***	***	***
COGS: Other factory	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	71,778	92,499	155,721	43,792	51,108
Operating income or (loss)	Value	***	***	***	***	***
All 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	6.4	9.2	7.8	4.9	4.6
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table continued.

Table III-9 Continued
CWP: Results of operations of U.S. producers, by item and period

Shares in percent; unit values in dollars per short ton; count in number of firms reporting

Item	Measure	2016	2017	2018
COGS: Raw materials	Share	***	***	***
COGS: Direct labor	Share	***	***	***
COGS: Other factory	Share	***	***	***
COGS: Total	Share	***	***	***
Total net sales	Unit value	857	967	1,195
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	73	86	110
Operating income or (loss)	Unit value	***	***	***
Net income or (loss)	Unit value	***	***	***
Operating losses	Count	***	***	***
Net losses	Count	***	***	***
Data	Count	***	***	***

Table Continued.

Table III-9 Continued
CWP: Results of operations of U.S. producers, by item and period

Shares in percent; unit values in dollars per short ton; 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	1,017	935	1,881	1,567	1,980
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	65	86	147	77	92
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 III-10
CWP: Changes in AUVs between comparison periods

Changes in percent

Item	2016-21	2016-17	2017-18	2018-19	2019-20	2020-21	Jan-Jun 2021-22
Total net sales	▲ 119.4	▲ 12.8	▲ 23.5	▼ (14.9)	▼ (8.0)	▲ 101.1	▲ 26.3
COGS: Raw materials	▲ ***	▲ ***	▲ ***	▼ ***	▼ ***	▲ ***	▲ ***
COGS: Direct labor	▲ ***	▲ ***	▲ ***	▲ ***	▼ ***	▲ ***	▲ ***
COGS: Other factory	▲ ***	▲ ***	▲ ***	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Total	▲ ***	▲ ***	▲ ***	▼ ***	▼ ***	▲ ***	▲ ***

Table continued.

Table III-10 Continued
CWP: Changes in AUVs between comparison periods

Changes in dollars per short ton

Item	2016-21	2016-17	2017-18	2018-19	2019-20	2020-21	Jan-Jun 2021-22
Total net sales	▲ 1,024	▲ 110	▲ 228	▼ (178)	▼ (82)	▲ 945	▲ 413
COGS: Raw materials	▲ ***	▲ ***	▲ ***	▼ ***	▼ ***	▲ ***	▲ ***
COGS: Direct labor	▲ ***	▲ ***	▲ ***	▲ ***	▼ ***	▲ ***	▲ ***
COGS: Other factory	▲ ***	▲ ***	▲ ***	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Total	▲ ***	▲ ***	▲ ***	▼ ***	▼ ***	▲ ***	▲ ***
Gross profit or (loss)	▲ ***	▼ ***	▲ ***	▼ ***	▲ ***	▲ ***	▲ ***
SG&A expense	▲ 75	▲ 14	▲ 24	▼ (46)	▲ 21	▲ 62	▲ 15
Operating income or (loss)	▲ ***	▼ ***	▲ ***	▼ ***	▲ ***	▲ ***	▼ ***
Net income or (loss)	▲ ***	▼ ***	▲ ***	▼ ***	▲ ***	▲ ***	▼ ***

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

Table III-11
CWP: Firm-by-firm total net sales quantity, by period

Net sales quantity

Quantity in short tons

Firm	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	989,241	1,011,269	1,030,645

Table continued.

Table III-11 Continued
CWP: Firm-by-firm total net sales quantity, by period

Net sales quantity

Quantity in short tons

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	1,111,214	1,077,904	1,056,900	567,947	556,176

Table continued.

Table III-11 Continued
CWP: Firm-by-firm total net sales value, by period

Net sales value

Value in 1,000 dollars

Firm	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	847,916	978,021	1,231,459

Table continued.

Table III-11 Continued
CWP: 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
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	1,129,771	1,008,043	1,987,661	889,989	1,101,075

Table continued.

Table III-11 Continued
CWP: Firm-by-firm cost of goods sold (“COGS”), by period

COGS

Value in 1,000 dollars

Firm	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	***	***	***

Table continued.

Table III-11 Continued
CWP: 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
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-11 Continued
CWP: Firm-by-firm gross profit or (loss), by period

Gross profit or (loss)

Value in 1,000 dollars

Firm	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	***	***	***

Table continued.

Table III-11 Continued
CWP: 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
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-11 Continued
CWP: Firm-by-firm selling, general, and administrative (“SG&A”) expenses, by period

SG&A expenses

Value in 1,000 dollars

Firm	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	71,761	87,098	113,779

Table Continued.

Table III-11 Continued**CWP: Firm-by-firm selling, general, and administrative (“SG&A”) expenses, by period****SG&A expenses**

Value in 1,000 dollars

	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	71,778	92,499	155,721	43,792	51,108

Table continued.

Table III-11 Continued**CWP: Firm-by-firm operating income or (loss), by period****Operating income or (loss)**

Value in 1,000 dollars

Firm	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	***	***	***

Table continued.

Table III-11 Continued**CWP: 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
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-11 Continued
CWP: Firm-by-firm net income or (loss), by period

Net income or (loss)

Value in 1,000 dollars

Firm	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	***	***	***

Table continued.

Table III-11 Continued
CWP: 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
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-11 Continued
CWP: Firm-by-firm ratio of COGS to net sales value, by period

COGS to net sales ratio

Ratios in percent

Firm	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	***	***	***

Table continued.

Table III-11 Continued

CWP: 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
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-11 Continued

CWP: 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	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	***	***	***

Table continued.

Table III-11 Continued

CWP: 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
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-11 Continued**CWP: 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	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	8.5	8.9	9.2

Table continued.

Table III-11 Continued**CWP: 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
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	6.4	9.2	7.8	4.9	4.6

Table continued.

Table III-11 Continued**CWP: 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	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	***	***	***

Table continued.

Table III-11 Continued

CWP: 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
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-11 Continued

CWP: 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	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	***	***	***

Table continued.

Table III-11 Continued

CWP: 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
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-11 Continued
CWP: Firm-by-firm unit net sales value, by period

Unit net sales value

Unit values in dollars per short ton

Firm	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	857	967	1,195

Table continued.

Table III-11 Continued
CWP: Firm-by-firm unit net sales value, by period

Unit net sales value

Unit values in dollars per short ton

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	1,017	935	1,881	1,567	1,980

Table continued.

Table III-11 Continued
CWP: Firm-by-firm unit raw material costs, by period

Unit raw material

Unit values in dollars per short ton

Firm	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	***	***	***

Table continued.

Table III-11 Continued
CWP: Firm-by-firm unit raw material costs, by period

Unit raw material

Unit values in dollars per short ton

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-11 Continued
CWP: Firm-by-firm unit direct labor cost, by period

Unit direct labor

Unit values in dollars per short ton

Firm	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	***	***	***

Table continued.

Table III-11 Continued
CWP: Firm-by-firm unit direct labor cost, by period

Unit direct labor

Unit values in dollars per short ton

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-11 Continued
CWP: Firm-by-firm unit other factory costs, by period

Unit other factory costs

Unit values in dollars per short ton

Firm	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	***	***	***

Table continued.

Table III-11 Continued
CWP: Firm-by-firm unit other factory costs, by period

Unit other factory costs

Unit values in dollars per short ton

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-11 Continued
CWP: Firm-by-firm unit COGS, by period

Unit COGS

Unit values in dollars per short ton

Firm	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	***	***	***

Table continued.

Table III-11 Continued
CWP: Firm-by-firm unit COGS, by period

Unit COGS

Unit values in dollars per short ton

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-11 Continued
CWP: Firm-by-firm unit gross profit or (loss), by period

Unit gross profit or (loss)

Unit values in dollars per short ton

Firm	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	***	***	***

Table continued.

Table III-11 Continued
CWP: Firm-by-firm unit gross profit or (loss), by period

Unit gross profit or (loss)

Unit values in dollars per short ton

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-11 Continued
CWP: Firm-by-firm unit SG&A expenses, by period

Unit SG&A expenses

Unit values in dollars per short ton

Firm	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	73	86	110

Table continued.

Table III-11 Continued
CWP: Firm-by-firm unit SG&A expenses, by period

Unit SG&A expenses

Unit values in dollars per short ton

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	65	86	147	77	92

Table continued.

Table III-11 Continued
CWP: Firm-by-firm unit operating income or (loss), by period

Unit operating income or (loss)

Unit values in dollars per short ton

Firm	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	***	***	***

Table continued.

Table III-11 Continued
CWP: Firm-by-firm unit operating income or (loss), by period

Unit operating income or (loss)

Unit values in dollars per short ton

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-11 Continued
CWP: Firm-by-firm unit net income or (loss), by period

Unit net income or (loss)

Unit values in dollars per short ton

Firm	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	***	***	***

Table continued.

Table III-11 Continued
CWP: Firm-by-firm unit net income or (loss), by period

Unit net income or (loss)

Unit values in dollars per short ton

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	***	***	***	***	***

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

Net sales

Total revenue consists mainly of commercial sales, with a small amount of internal consumption and transfers to related firms. In 2021, internal consumption and transfers to related firms accounted for *** and *** percent of total revenue, respectively. Internal consumption and transfers to related firms are included in the financial data, but not shown separately in this section of the report.¹⁴

As shown in table III-9, total sales quantity increased from 2016 to 2019, then declined from 2019 to 2021; and overall increased from 2016 to 2021. Total sales quantity was lower in interim 2022 compared with interim 2021. Total net sales value also increased from 2016 (\$847.9 million) to 2018 (\$1.2 billion), then declined from 2018 to 2020 (\$1.0 billion) before increasing to its highest level of \$2.0 billion in 2021. Total net sales value was higher in interim 2022 at \$1.1 billion compared with interim 2021 at \$890.0 million.¹⁵ On a firm-by-firm basis, all U.S. producers except *** reported an overall increase in net sales quantity from 2016 to 2021 and all except *** reported an overall increase in sales values from 2016 to 2021. The directional trends of sales quantity varied during the interim periods while those of sales value were more uniform, with the majority of firms showing higher sales values in interim 2022 compared with interim 2021. On an average per-short-ton basis, net sales value increased from \$857 in 2016 to \$1,195 in 2018 then declined to \$1,017 in 2019 and \$935 in

¹⁴ ***. Email from ***, August 23, 2022, and Email from ***, September 7, 2022. Transfers to related firms were reported by ***. U.S. producers' response, section II-8.

¹⁵ ***. Emails from ***, August 29, 2022, and September 15, 2022. ***. Email from *** August 30, 2022.

2020 before increasing to \$1,881 in 2021, and was higher in interim 2022 at \$1,980 compared with interim 2021 at \$1,567.¹⁶ On a firm-by-firm basis, *** U.S. producers reported an increase in their unit values from 2016 to 2018 followed by a decline in 2019 and 2020 before a substantial increase in 2021 related to the increase in prices of hot-rolled steel during that same year. *** U.S. producers except *** reported higher unit sales values in interim 2022 compared with interim 2021.¹⁷

Cost of goods sold and gross profit or loss

Raw material costs, direct labor and other factory costs accounted for *** percent of total COGS, respectively, in 2021.

Raw material costs, the largest component of COGS, were directly affected by the prices of hot-rolled steel and increased from 2016 to 2018 then declined in 2019 and 2020 before substantially increasing by *** percent from 2020 to 2021.¹⁸ Raw material costs were also higher in interim 2022 compared with interim 2021.¹⁹ On an average per-short-ton basis, raw

¹⁶ In response to Commission staff about its trends ***. Email from ***, August 24, 2022.

¹⁷ ***. Email from ***, September 6, 2022.

¹⁸ ***. Domestic producers' posthearing brief, responses to Commission questions, #3, p.5.

¹⁹ *** U.S. producers except *** indicated that raw material costs overall increased since 2016 and that they were able to pass along steel costs increases to their customers indicating that prices of hot-rolled steel affect the prices of CWP. U.S. producers' questionnaires responses, sections III-9d and IV-20. ***. Email from ***, August 23, 2022, and *** U.S. producers' questionnaire response, part VI-20 and III-9d. *** stated that in 2021 ***. Email from *** also stated that ***. Email from ***, September 7, 2022.

material costs increased from \$*** in 2016 to \$*** in 2018, then declined to \$*** in 2019 and \$*** in 2020 before increasing to \$*** in 2021, and were higher in interim 2022 at \$*** compared with interim 2021 at \$***. On a firm-by-firm basis, *** of U.S. producers' raw material costs per short ton followed the same directional trend as the broader average for the full years and the interim periods.²⁰ As a ratio to net sales, raw material costs increased from *** percent in 2016 to *** percent in 2018 then declined to *** and *** percent in 2019 and 2020, respectively, before increasing to *** percent in 2021. In interim 2022, the raw material costs ratio was higher at *** percent compared with interim 2021 at *** percent.

Table III-12 presents details on specific raw material inputs as a share of total raw material costs in 2021. Hot-rolled steel accounted for the largest share of raw material costs accounting for *** percent, while coating and other material inputs such as couplings and thread protectors accounted for *** and *** percent, respectively.²¹

Table III-12
CWP: Raw material costs in 2021

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

Item	Value	Share of value
Hot-rolled steel	***	***
Coating materials	***	***
Other material inputs	***	***
All raw materials	***	***

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

Direct labor costs, the second largest share of COGS for most years, increased from 2016 to 2019 and declined from 2019 to 2020 before increasing in 2021, and were slightly higher in interim 2022 compared with interim 2021. On an average per-short-ton basis, direct labor costs

²⁰ ***.

²¹ ***. U.S. producers' questionnaire responses, III-7.

increased from \$*** in 2016 to \$*** in 2019 then declined to \$*** in 2020 before increasing to \$*** in 2021, and were higher in interim 2022 at \$*** compared with interim 2021 at \$***. As a ratio to net sales, direct labor costs irregularly increased from *** percent in 2016 to *** percent in 2021, and were lower at *** percent in interim 2022 compared with interim 2021 at *** percent.^{22 23}

Other factory costs, the smallest share of COGS for most years, increased overall from 2016 to 2021, and were higher in interim 2022 compared with interim 2021. On an average per-short-ton basis, other factory costs increased from \$*** in 2016 to \$*** in 2021, and were higher in interim 2022 at \$*** compared with interim 2021 at \$***. As a ratio to net sales, other factory costs irregularly decreased from *** percent in 2016 to *** percent in 2021, and were lower in interim 2022 at *** percent compared with interim 2021 at *** percent.

Total COGS increased from 2016 to 2018 then declined in 2019 and 2020 before increasing in 2021, and was higher in interim 2022 compared with interim 2021. On an average per-short-ton basis, total COGS increased from \$*** in 2016 to \$*** in 2017, and to \$*** in 2018 then declined to \$*** in 2019 and \$*** in 2020 before increasing to a high of \$*** in 2021. Total COGS was higher in interim 2022 at \$*** compared with interim 2021 at \$***. As a ratio to net sales, total COGS irregularly increased from *** percent in 2016 to *** percent in 2021, and was higher in interim 2022 at *** percent compared with interim 2021 at *** percent.²⁴

As shown in table III-9, gross profit irregularly increased from \$*** in 2016 to \$*** in 2021 and was higher in interim 2022 at \$*** compared with interim 2021 at \$***. On a company specific basis, ***

²² ***. Email from ***, August 23, 2022.

²³ ***. Email from ***, August 29, 2022.

²⁴ ***. Email from ***, September 8, 2022.

*** the *** U.S. producers reported an overall increase in their gross profits from 2016 to 2021. *** other U.S. producers also reported an overall increase in their reported gross profits from 2016 to 2021. U.S producers varied in directional trends in the interim periods.²⁵ As a ratio to net sales, gross profit irregularly declined from *** percent in 2016 to *** percent in 2021, and was lower in interim 2022 at *** percent compared with interim 2021 at *** percent.

SG&A expenses and operating income or loss

Total SG&A expenses increased from 2016 to 2021 and were higher in interim 2022 compared with interim 2021. The corresponding SG&A expense ratio irregularly declined from 8.5 percent in 2016 to 7.8 percent in 2021, and was 0.3 percentage points lower in interim 2022 at 4.6 percent compared with interim 2021 at 4.9 percent.²⁶

Operating income declined from \$*** in 2016 to \$*** in 2017 then increased to \$*** in 2018, before falling to its lowest level of \$*** in 2019; operating income then increased to \$*** in 2020 and \$*** in 2021, and was lower in interim 2022 at \$*** compared with interim 2021 at \$***. As a ratio to net sales, operating income irregularly decreased from *** percent in 2016 to *** percent in 2021, and was lower in interim 2022 at *** percent compared with interim 2021 at *** percent. On a company specific basis, the *** U.S. producers *** reported a decline in operating income from 2016 to 2019 followed by an increase in 2020 and 2021 for *** while *** operating profits continued to decline in 2020 and 2021. For the interim periods, *** reported higher operating income in interim 2022 compared with interim 2021, while *** reported lower operating profits in interim 2022 compared with interim 2021. The rest of the U.S. producers reported an increase in their operating profits and a

²⁵ ***.

²⁶ ***. Email from ***, August 23, 2021. ***. Emails from ***, August 23, and October 24, 2022.

decrease in losses from 2016 to 2021, and varied in directional trends between the interim periods.

All other expenses and net income or loss

Classified below the operating income level are interest expense, other expense, and other income. In table III-9 these items are aggregated and only the net amount is shown. The majority of the amount shown were interest expenses reported by *** followed by other expenses, the majority of which were reported by ***. The net amount shown was relatively stable but irregularly increased from 2016 to 2021 and was slightly lower in interim 2022 compared with interim 2021.^{27 28}

Net income increased from \$*** in 2016 to \$*** in 2018 then declined to \$*** in 2019 before increasing to \$*** in 2021. Net income was lower in interim 2022 at \$*** compared with interim 2021 at \$***. As a ratio to net sales, net income irregularly decreased from *** percent in 2016 to *** percent in 2021, and was lower in interim 2022 at *** percent compared with interim 2021 at *** percent.^{29 30}

²⁷ ***. Email from *** August 29, 2022.

²⁸ ***. Emails from *** August 23, 2022. ***. U.S producers' questionnaire responses, question III-9a.

²⁹ ***. U.S. producers' questionnaire response, section III-9a.

³⁰ A variance analysis is not presented in this report. As previously mentioned in footnote 12, ***, which lessens the usefulness of the variance analysis.

Capital expenditures and research and development expenses³¹

Table III-13 presents capital expenditures, by firm, and table III-14 presents the firms' narrative explanations of the nature, focus, and significance of their capital expenditures. Total capital expenditures increased from 2016 to 2021 and were higher in interim 2022 compared with interim 2021.³²

Table III-13
CWP: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars

Firm	2016	2017	2018
Atlas Tube	***	***	***
Bull Moose	***	***	***
CSI	***	***	***
EXLTUBE	***	***	***
Maruichi	***	***	***
Nucor	***	***	***
Wheatland	***	***	***
All firms	20,359	17,466	32,726

Table Continued.

³¹ ***.

³² ***. Email from ***, August 29, 2022. ***. Email from ***, August 23, 2022.

Table III-13 Continued
CWP: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars

Firm	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Atlas Tube	***	***	***	***	***
Bull Moose	***	***	***	***	***
CSI	***	***	***	***	***
EXLTUBE	***	***	***	***	***
Maruichi	***	***	***	***	***
Nucor	***	***	***	***	***
Wheatland	***	***	***	***	***
All firms	35,431	57,078	58,158	25,946	30,980

Source: Compiled from data submitted in response to Commission questionnaires

Table III-14
CWP: Narrative descriptions of U.S. producers' capital expenditures, by firm

Firm	Narrative on capital expenditures
Atlas Tube	***
Bull Moose	***
EXLTUBE	***
Maruichi	***
Nucor	***
Wheatland	***

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

Assets and return on assets

Table III-15 presents data on the U.S. producers' total net assets, while table III-16 presents their operating ROA.³³ Table III-17 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time. Total net assets irregularly increased from \$*** in 2016 to \$*** in 2021. The majority of this increase reflects *** data. Return on assets decreased from *** percent in 2016 to *** percent in 2021.

³³ 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.

Table III-15
CWP: U.S. producers' total net assets, by firm and period

Value in 1,000 dollars

Firm	2016	2017	2018	2019	2020	2021
Atlas Tube	***	***	***	***	***	***
Bull Moose	***	***	***	***	***	***
CSI	***	***	***	***	***	***
EXLTUBE	***	***	***	***	***	***
Maruichi	***	***	***	***	***	***
Nucor	***	***	***	***	***	***
Wheatland	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Table III-16
CWP: U.S. producers' ROA, by firm and period

Ratio in percent

Firm	2016	2017	2018	2019	2020	2021
Atlas Tube	***	***	***	***	***	***
Bull Moose	***	***	***	***	***	***
CSI	***	***	***	***	***	***
EXLTUBE	***	***	***	***	***	***
Maruichi	***	***	***	***	***	***
Nucor	***	***	***	***	***	***
Wheatland	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Table III-17
CWP: Narrative descriptions of U.S. producers' total net assets, by firm

Firm	Narrative on assets
Atlas Tube	***
Bull Moose	***
Nucor	***
Wheatland	***

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

Part IV: U.S. imports and the foreign industries

U.S. imports

Overview

The Commission issued questionnaires to 85 potential importers of CWP between 2016 and 2021. Fourteen firms provided data and information in response to the questionnaires, while seventeen firms indicated that they had not imported product during the period for which data were collected.¹ Based on official Commerce statistics for imports of CWP, importers' questionnaire data accounted for *** percent of subject imports during 2021 and *** percent of total imports during 2021.² Firms responding to the Commission's questionnaire accounted for the following shares of individual subject country's subject imports (as a share of official import statistics, by quantity) during 2021.

- *** percent of the subject imports from Oman
- No responses reported data for subject imports from Pakistan
- *** percent of the subject imports from the UAE

In light of the data coverage by the Commission's questionnaires, import data in this report are based on official Commerce statistics for CWP.³

¹ Neither International Industries Limited, the sole responding foreign producer from Pakistan in the original investigations, nor its related importer *** responded to multiple staff requests for a questionnaire response. Imports from Pakistan in recent periods have been minimal.

Conares Metal Supply Ltd., a producer of CWP in the UAE and possible importer, did not respond to multiple staff requests for questionnaire responses.

² Questionnaire data for U.S. imports of CWP were compared to official U.S. import statistics of the U.S. Department of Commerce using the seven primary HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090.

Official import statistics for nonsubject sources, particularly Canada and Mexico, may be overstated. In the original investigations, record evidence suggested that considerable volumes of imports under the primary HTS numbers from Canada and Mexico were out-of-scope. Original publication, p. IV-1, fn. 4.

³ While 17 HTS statistical reporting numbers are provided in the scope as the numbers under which the subject product is "currently classifiable", official import statistics presented in this report are based on 7 "primary HTS numbers" which are believed to account for the majority of imports of CWP: 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090.

Imports from subject and nonsubject countries

Table IV-1 present information on U.S. imports of CWP from subject sources and all other sources over the period examined. By quantity, subject imports accounted for 11.0 percent of total imports in 2016 and for 27.8 percent in 2021. Overall, imports from subject sources rose 96.6 percent from 2016-21, and were 37.6 percent higher in interim 2022 than in interim 2021. Subject imports from the UAE accounted for the largest quantity of subject imports in all full and interim periods, and irregularly rose 115.6 percent from 2016-21. They were 31.4 percent higher in interim 2022 than in interim 2021. Subject imports from Oman irregularly increased 109.7 percent from 2016-21, and were 49.8 percent higher in interim 2022 than in interim 2021. Subject imports from Pakistan were at their highest share of total imports in 2016, when they accounted for 0.9 percent share of imports; in subsequent periods, the share of imports accounted for by Pakistan were at or near zero percent. Imports from nonsubject sources decreased 36.6 percent from 2016-21, but were 39.9 percent higher in interim 2022 than in interim 2021.⁴

⁴ Domestic producers argue that nonsubject imports decreased over the period due to the combined effects of increasing antidumping margins for nonsubject countries and the imposition of Section 232 duties. Specifically, they note the large decline that occurred between 2017 and 2019 and attribute this decline to decreased imports from South Korea, Thailand, and Mexico following administrative reviews of CWP from those countries by Commerce resulting in “significantly higher” cash deposit rates. See Domestic Producers’ posthearing brief, “Answers to Commission Questions in Lieu Of Hearing”, pp. 21-23.

Table IV-1
CWP: U.S. imports by source and period

Quantity in short tons; value in 1,000 dollars; unit values in dollars per short ton

Source	Measure	2016	2017	2018
Oman	Quantity	28,147	48,239	53,704
Pakistan	Quantity	7,010	---	535
UAE	Quantity	52,872	106,132	84,969
Subject sources	Quantity	88,029	154,371	139,208
Nonsubject sources	Quantity	710,744	952,937	702,849
All import sources	Quantity	798,773	1,107,308	842,057
Oman	Value	16,202	33,643	48,306
Pakistan	Value	3,969	---	452
UAE	Value	32,346	79,402	81,828
Subject sources	Value	52,518	113,045	130,585
Nonsubject sources	Value	634,549	842,481	772,491
All import sources	Value	687,067	955,526	903,076
Oman	Unit value	576	697	899
Pakistan	Unit value	566	---	844
UAE	Unit value	612	748	963
Subject sources	Unit value	597	732	938
Nonsubject sources	Unit value	893	884	1,099
All import sources	Unit value	860	863	1,072

Table continued.

Table IV-1 Continued
CWP: U.S. imports by source and period

Quantity in short tons; value in 1,000 dollars; unit values in dollars per short ton

Source	Measure	2019	2020	2021	Jan-Jun 2020	Jan-Jun 2021
Oman	Quantity	54,699	37,375	59,018	26,594	39,829
Pakistan	Quantity	95	---	57	---	---
UAE	Quantity	87,388	105,116	113,982	51,845	68,128
Subject sources	Quantity	142,183	142,491	173,057	78,439	107,958
Nonsubject sources	Quantity	510,997	445,616	450,364	208,994	292,481
All import sources	Quantity	653,179	588,107	623,420	287,434	400,438
Oman	Value	50,062	29,675	67,933	25,093	62,819
Pakistan	Value	69	---	56	---	---
UAE	Value	84,312	87,159	132,809	51,939	110,349
Subject sources	Value	134,443	116,834	200,798	77,032	173,168
Nonsubject sources	Value	566,306	432,809	698,216	275,179	523,124
All import sources	Value	700,749	549,643	899,014	352,211	696,292
Oman	Unit value	915	794	1,151	944	1,577
Pakistan	Unit value	726	---	981	---	---
UAE	Unit value	965	829	1,165	1,002	1,620
Subject sources	Unit value	946	820	1,160	982	1,604
Nonsubject sources	Unit value	1,108	971	1,550	1,317	1,789
All import sources	Unit value	1,073	935	1,442	1,225	1,739

Table continued.

Table IV-1 Continued
CWP: U.S. imports by source and period

Shares and ratios in percent; ratios represent the ratio to U.S. production

Source	Measure	2016	2017	2018
Oman	Share of quantity	3.5	4.4	6.4
Pakistan	Share of quantity	0.9	---	0.1
UAE	Share of quantity	6.6	9.6	10.1
Subject sources	Share of quantity	11.0	13.9	16.5
Nonsubject sources	Share of quantity	89.0	86.1	83.5
All import sources	Share of quantity	100.0	100.0	100.0
Oman	Share of value	2.4	3.5	5.3
Pakistan	Share of value	0.6	---	0.1
UAE	Share of value	4.7	8.3	9.1
Subject sources	Share of value	7.6	11.8	14.5
Nonsubject sources	Share of value	92.4	88.2	85.5
All import sources	Share of value	100.0	100.0	100.0
Oman	Ratio	3.5	4.7	5.1
Pakistan	Ratio	0.9	---	0.1
UAE	Ratio	6.5	10.3	8.0
Subject sources	Ratio	10.9	15.0	13.1
Nonsubject sources	Ratio	88.0	92.5	66.3
All import sources	Ratio	98.9	107.4	79.4

Table continued.

Table IV-1 Continued
CWP: U.S. imports by source and period

Shares and ratios in percent; ratios represent the ratio to U.S. production

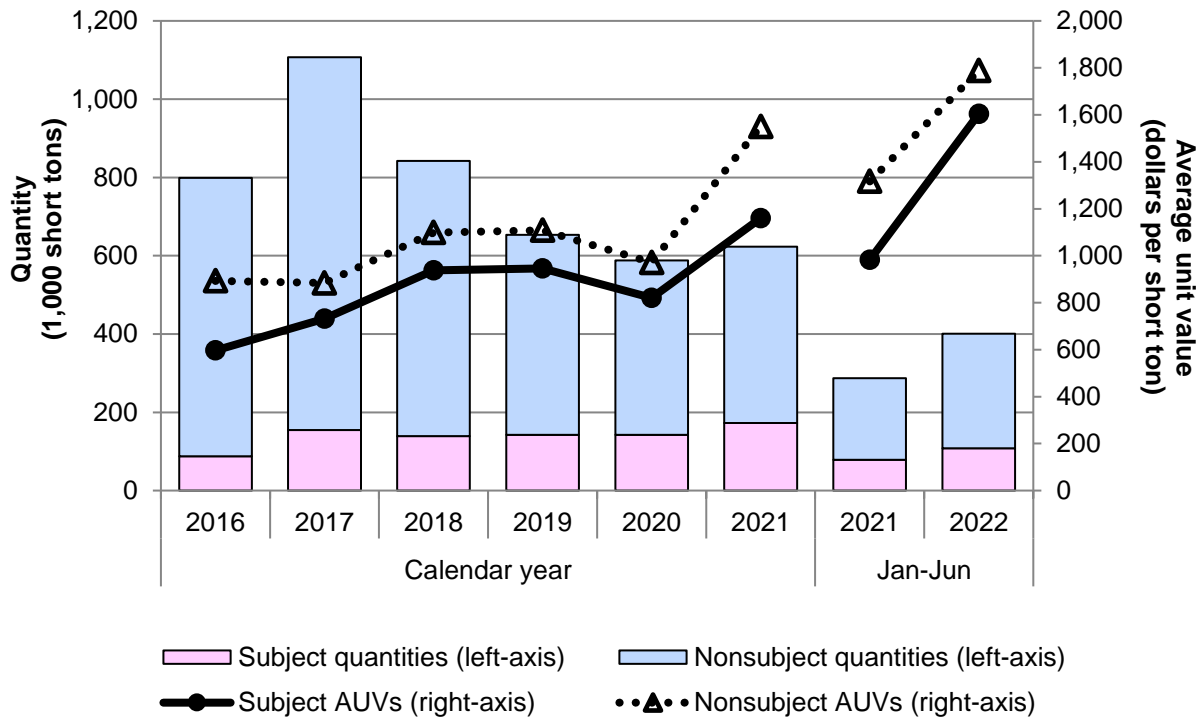
Source	Measure	2019	2020	2021	Jan-Jun 2020	Jan-Jun 2021
Oman	Share of quantity	8.4	6.4	9.5	9.3	9.9
Pakistan	Share of quantity	0.0	---	0.0	---	---
UAE	Share of quantity	13.4	17.9	18.3	18.0	17.0
Subject sources	Share of quantity	21.8	24.2	27.8	27.3	27.0
Nonsubject sources	Share of quantity	78.2	75.8	72.2	72.7	73.0
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
Oman	Share of value	7.1	5.4	7.6	7.1	9.0
Pakistan	Share of value	0.0	---	0.0	---	---
UAE	Share of value	12.0	15.9	14.8	14.7	15.8
Subject sources	Share of value	19.2	21.3	22.3	21.9	24.9
Nonsubject sources	Share of value	80.8	78.7	77.7	78.1	75.1
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
Oman	Ratio	4.9	3.4	5.5	4.6	7.0
Pakistan	Ratio	0.0	---	0.0	---	---
UAE	Ratio	7.8	9.6	10.6	9.0	12.0
Subject sources	Ratio	12.8	13.1	16.0	13.6	19.0
Nonsubject sources	Ratio	45.8	40.9	41.8	36.2	51.5
All import sources	Ratio	58.6	54.0	57.8	49.8	70.5

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090 accessed August 30, 2022. Imports are based on the imports for consumption data series. Import values are reported on a landed, (normal) duty-paid value.

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

Note: In the original investigation, petitioners estimated that 50-60 percent of imports from nonsubject sources Canada and Mexico were out-of-scope, and staff was able to present more comprehensive import data primarily using questionnaire data (given high coverage from subject and nonsubject sources) and additional data included from proprietary Customs records. (Petition, pp. 17-18, and Original publication, pp. IV-1, fn. 3.) Therefore, official import statistics presented in this report from nonsubject sources may be overstated.

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



Source: Compiled from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090 accessed August 30, 2022. Imports are based on the imports for consumption data series. Import values are reported on a landed, (normal) duty-paid value.

Cumulation considerations

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

Fungibility

Tables IV-2 through IV-6, and figures IV-2 through IV-5, present detailed U.S. shipment data for 2021 reported by U.S. producers and U.S. importers on CWP by wall thickness, nominal pipe size (NPS), standards, grade of steel, and of various product attributes.⁵

Table IV-2 and figure IV-2 present detailed shipment data on CWP by wall thickness in 2021. The majority of wall thicknesses reported from both U.S. producers and U.S. importers, and for both subject and nonsubject sources, were of schedule 20, 30, 40s, and 40, followed by nonspecified wall thicknesses, and lastly by schedule 10s and 10. Only minimal amounts of shipments of schedule 5s and 5 CWP, and *** by nonsubject sources, were reported in 2021.

Table IV-2
CWP: U.S. producers' and U.S. importers' U.S. shipments in 2021, by wall thickness and source

Quantity in short tons

Wall thickness	U.S. producers	Oman	Pakistan	UAE	Subject sources	Nonsubject sources	U.S. producers and U.S. importers
Schedule 5s and 5	***	***	***	***	***	***	***
Schedule 10s and 10	***	***	***	***	***	***	***
Schedule 20, 30, 40s, and 40	***	***	***	***	***	***	***
All other wall thicknesses	***	***	***	***	***	***	***
All wall thicknesses	***	***	***	***	***	***	***

Table continued.

⁵ Nominal pipe size (NPS) is a dimensionless designator of pipe size. It indicates standard pipe size when followed by the specific size designation number without an inch symbol. Schedule is an indicator of pipe wall thickness. Schedule is expressed in numbers and the higher the schedule number, the thicker the pipe is. Schedule numbers followed by the letter S are per ASME B36.19M and are primarily intended for use with stainless steel pipe. Grade refers to the chemical composition of the steel used to produce the pipe and is typically determined by the ASTM specifications.

Foreign producers were also asked to provide detailed shipment data for their total shipments in 2021 (including both home market and export market shipments). Detailed comparative data between U.S. producers and foreign producers is provided in appendix F.

Despite repeated attempts by staff to obtain detailed shipment data from interested party Al Jazeera, the *** importer with 2021 data for imports from Oman, ***. Email from ***, September 9th, 2022.

Table IV-2 Continued

CWP: U.S. producers' and U.S. importers' U.S. shipments in 2021, by wall thickness and source

Share across in percent

Wall thickness	U.S. producers	Oman	Pakistan	UAE	Subject sources	Nonsubject sources	U.S. producers and U.S. importers
Schedule 5s and 5	***	***	***	***	***	***	***
Schedule 10s and 10	***	***	***	***	***	***	***
Schedule 20, 30, 40s, and 40	***	***	***	***	***	***	***
All other wall thicknesses	***	***	***	***	***	***	***
All wall thicknesses	***	***	***	***	***	***	***

Table continued.

Table IV-2 Continued

CWP: U.S. producers' and U.S. importers' U.S. shipments in 2021, by wall thickness and source

Share down in percent

Wall thickness	U.S. producers	Oman	Pakistan	UAE	Subject sources	Nonsubject sources	U.S. producers and U.S. importers
Schedule 5s and 5	***	***	***	***	***	***	***
Schedule 10s and 10	***	***	***	***	***	***	***
Schedule 20, 30, 40s, and 40	***	***	***	***	***	***	***
All other wall thicknesses	***	***	***	***	***	***	***
All wall thicknesses	***	***	***	***	***	***	***

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.

Figure IV-2

CWP: U.S. producers' and U.S. importers' U.S. shipments in 2021, by wall thickness and source

* * * * *

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

Table IV-3 and figure IV-3 present detailed shipment data on CWP by nominal pipe size (NPS) in 2021. The majority of NPS reported from both U.S. producers and U.S. importers, and for both subject and nonsubject sources, were of ½ to 2 NPS.

For U.S. producers, the second most shipped NPS was 2 ½ to 3 ½ NPS, followed by 4 to 8 NPS, and lastly by 9 to 16 NPS. For importers from subject sources, the second most shipped NPS was 4 to 8 NPS, followed by 2 ½ to 3 ½ NPS, and lastly by 9 to 16 NPS.

For importers of CWP from nonsubject sources, the second most shipped NPS was of 4 to 8 NPS, followed by 9 to 16 NPS, and lastly by 2 ½ to 3 ½ NPS.

Table IV-3**CWP: U.S. producers' and U.S. importers' U.S. shipments in 2021, by nominal pipe size and source**

Quantity in short tons

Nominal pipe size (NPS) range	U.S. producers	Oman	Pakistan	UAE	Subject sources	Nonsubject sources	U.S. producers and U.S. importers
1/2 to 2 NPS	***	***	***	***	***	***	***
2 1/2 to 3 1/2	***	***	***	***	***	***	***
4 to 8 NPS	***	***	***	***	***	***	***
9 to 16 NPS	***	***	***	***	***	***	***
All NPS	***	***	***	***	***	***	***

Table continued.

Table IV-3 Continued**CWP: U.S. producers' and U.S. importers' U.S. shipments in 2021, by nominal pipe size and source**

Share across in percent

Nominal pipe size (NPS) range	U.S. producers	Oman	Pakistan	UAE	Subject sources	Nonsubject sources	U.S. producers and U.S. importers
1/2 to 2 NPS	***	***	***	***	***	***	***
2 1/2 to 3 1/2	***	***	***	***	***	***	***
4 to 8 NPS	***	***	***	***	***	***	***
9 to 16 NPS	***	***	***	***	***	***	***
All NPS	***	***	***	***	***	***	***

Table continued.

Table IV-3 Continued**CWP: U.S. producers' and U.S. importers' U.S. shipments in 2021, by nominal pipe size and source**

Share down in percent

Nominal pipe size (NPS) range	U.S. producers	Oman	Pakistan	UAE	Subject sources	Nonsubject sources	U.S. producers and U.S. importers
1/2 to 2 NPS	***	***	***	***	***	***	***
2 1/2 to 3 1/2	***	***	***	***	***	***	***
4 to 8 NPS	***	***	***	***	***	***	***
9 to 16 NPS	***	***	***	***	***	***	***
All NPS	***	***	***	***	***	***	***

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.

Figure IV-3
CWP: U.S. producers' and U.S. importers' U.S. shipments in 2021, by nominal pipe size and source

* * * * *

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

Table IV-4 and figure IV-4 present detailed shipment data on CWP by standard in 2021. The majority of standards reported shipped by U.S. producers were of ASTM A135/A795, followed by ASTM A500/A252, then ASTM A53, then in-scope fence tubing standards, and lastly all other standards. However, no standard category was less than *** percent of the share of shipments by U.S. producers in 2021.

For importers from subject sources, most shipments were of ASTM A53 (more than *** percent of the share of imports in 2021), followed by all other standards, then ATM A500/A252, and lastly ASTM A135/A795. No subject source importers reported shipments of CWP of in-scope fence tubing standards.

For importers of CWP from nonsubject sources, most shipments were of ASTM A53 and then ASTM A500/A252 (which combined comprised *** percent of shipments from nonsubject sources in 2021). The next highest share was attributable to all other standards, and then lastly ASTM A135/A795. No nonsubject source importers reported shipments of CWP of in-scope fence tubing standards.

Table IV-4**CWP: U.S. producers' and U.S. importers' U.S. shipments in 2021, by all standards and source**

Quantity in short tons

Standard(s)	U.S. producers	Oman	Pakistan	UAE	Subject sources	Nonsubject sources	U.S. producers and U.S. importers
ASTM A53	***	***	***	***	***	***	***
ASTM A135/A795	***	***	***	***	***	***	***
ASTM A500/A252	***	***	***	***	***	***	***
In-scope fence tubing standards	***	***	***	***	***	***	***
Other/ multiple/ or no standards	***	***	***	***	***	***	***
All standards or lack thereof	***	***	***	***	***	***	***

Table continued.

Table IV-4 Continued**CWP: U.S. producers' and U.S. importers' U.S. shipments in 2021, by all standards and source**

Share across in percent

Standard(s)	U.S. producers	Oman	Pakistan	UAE	Subject sources	Nonsubject sources	U.S. producers and U.S. importers
ASTM A53	***	***	***	***	***	***	***
ASTM A135/A795	***	***	***	***	***	***	***
ASTM A500/A252	***	***	***	***	***	***	***
In-scope fence tubing standards	***	***	***	***	***	***	***
Other/ multiple/ or no standards	***	***	***	***	***	***	***
All standards or lack thereof	***	***	***	***	***	***	***

Table continued.

Table IV-4 Continued

CWP: U.S. producers' and U.S. importers' U.S. shipments in 2021, by all standards and source

Share down in percent

Standard(s)	U.S. producers	Oman	Pakistan	UAE	Subject sources	Nonsubject sources	U.S. producers and U.S. importers
ASTM A53	***	***	***	***	***	***	***
ASTM A135/A795	***	***	***	***	***	***	***
ASTM A500/A252	***	***	***	***	***	***	***
In-scope fence tubing standards	***	***	***	***	***	***	***
Other/ multiple/ or no standards	***	***	***	***	***	***	***
All standards or lack thereof	***	***	***	***	***	***	***

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.

Figure IV-4

CWP: U.S. producers' and U.S. importers' U.S. shipments in 2021, by all standards and source

* * * * *

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

Table IV-5 and figure IV-5 present detailed shipment data on CWP by grade of steel in 2021. The majority of grade reported shipped by U.S. producers were of Grade A, followed by Grade B (which combined accounted for *** percent of shipments in 2021) and then all other grades.

For importers from subject sources, most shipments were of CWP with grade A steel (*** percent of the share of imports in 2021), followed by grade B, and then all other grades.

The majority of grade reported shipped by importers of CWP from nonsubject sources were of Grade A, followed by Grade B (which combined accounted for *** percent of shipments in 2021) and then all other grades.

Table IV-5
CWP: U.S. producers' and U.S. importers' U.S. shipments in 2021, by source and grade of steel

Quantity in short tons

Source	Grade A	Grade B	Other grades	All grades
U.S. producers	***	***	***	***
Oman	***	***	***	***
Pakistan	***	***	***	***
UAE	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued.

Table IV-5 Continued
CWP: U.S. producers' and U.S. importers' U.S. shipments in 2021, by source and grade of steel

Share across in percent

Source	Grade A	Grade B	Other grades	All grades
U.S. producers	***	***	***	***
Oman	***	***	***	***
Pakistan	***	***	***	***
UAE	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued.

Table IV-5 Continued

CWP: U.S. producers' and U.S. importers' U.S. shipments in 2021, by source and grade of steel

Share down in percent

Source	Grade A	Grade B	Other grades	All grades
U.S. producers	***	***	***	***
Oman	***	***	***	***
Pakistan	***	***	***	***
UAE	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

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.

Figure IV-5

CWP: U.S. producers' and U.S. importers' U.S. shipments in 2021, by source and grade of steel

* * * * *

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

Table IV-6 presents U.S. producers' and U.S. importers' counts of various attributes (including certain end finishes, surface finishes, and lengths) applicable to any portion of their U.S. shipments of CWP in 2021.

Table IV-6
CWP: Count of U.S. producers and U.S. importers responses regarding product mix

Count in number of firms reporting

Source	U.S. Producers	Oman	Pakistan	UAE	Subject sources	Nonsubject sources	All import sources
End finishes: Plain end/ square cut	6	***	***	***	***	***	***
End finishes: Beveled	5	***	***	***	***	***	***
End finishes: Threaded	1	***	***	***	***	***	***
End finishes: Threaded and coupled	1	***	***	***	***	***	***
End finishes: Other end finishes	2	***	***	***	***	***	***
Surface finishes: Black	7	***	***	***	***	***	***
Surface finishes: Painted	4	***	***	***	***	***	***
Surface finishes: Galvanized	3	***	***	***	***	***	***
Surface finishes: Other surface finishes	2	***	***	***	***	***	***
Lengths: Single random lengths	6	***	***	***	***	***	***
Lengths: Double random lengths	6	***	***	***	***	***	***
Lengths: Triple random lengths	4	***	***	***	***	***	***
Lengths: Quadruple random lengths	3	***	***	***	***	***	***
Lengths: Other lengths	2	***	***	***	***	***	***

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

Geographical markets

Table IV-7 presents data on U.S. imports of CWP by border of entry in 2021. According to official U.S. import statistics, U.S. imports from Oman entered through ports located in every region but the Northern region in 2021, while imports from the UAE entered through ports located in every region (but imports through the Northern region comprising only 0.3 percent in 2021). The minimal imports entered from Pakistan in 2021 were entirely through ports in the Western region in 2021.

Table IV-7
CWP: U.S. imports in 2021, by source and border of entry

Quantity in short tons

Source	East	North	South	West	All borders
Oman	21,427	---	24,544	13,047	59,018
Pakistan	---	---	---	57	57
UAE	30,297	297	52,278	31,109	113,982
Subject sources	51,724	297	76,822	44,213	173,057
Nonsubject sources	82,867	140,152	147,925	79,420	450,364
All import sources	134,591	140,449	224,748	123,633	623,420

Table continued.

Table IV-7 Continued
CWP: U.S. imports in 2021, by source and border of entry

Share across in percent

Source	East	North	South	West	All borders
Oman	36.3	---	41.6	22.1	100.0
Pakistan	---	---	---	100.0	100.0
UAE	26.6	0.3	45.9	27.3	100.0
Subject sources	29.9	0.2	44.4	25.5	100.0
Nonsubject sources	18.4	31.1	32.8	17.6	100.0
All import sources	21.6	22.5	36.1	19.8	100.0

Table continued.

Table IV-7 Continued
CWP: U.S. imports in 2021, by source and border of entry

Share down in percent

Source	East	North	South	West	All borders
Oman	15.9	---	10.9	10.6	9.5
Pakistan	---	---	---	0.0	0.0
UAE	22.5	0.2	23.3	25.2	18.3
Subject sources	38.4	0.2	34.2	35.8	27.8
Nonsubject sources	61.6	99.8	65.8	64.2	72.2
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090 accessed August 30, 2022. Imports are based on the imports for consumption data series.

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

Presence in the market

Table IV-8 and figures IV-6 and IV-7 present monthly data for subject and nonsubject imports during January 2016-June 2022. U.S. imports from Oman were present in every month during January 2016-June 2022 except for April 2022. U.S. imports from Pakistan were present in only nine months from January 2016-June 2022 (three months in 2016, three months in 2018, two months in 2019, and one month in 2021). U.S. imports from the UAE were present in every month. Overall, imports from subject and nonsubject sources were present in every month during January 2016-June 2022.

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

Quantity in short tons

Year	Month	Oman	Pakistan	UAE	Subject sources	Nonsubject sources	All import sources
2016	January	1,368	4,177	8,110	13,655	67,986	81,641
2016	February	1,280	1,343	6,982	9,605	57,885	67,490
2016	March	2,208	1,489	7,911	11,608	52,352	63,960
2016	April	2,163	---	7,782	9,945	63,166	73,111
2016	May	2,710	---	7,090	9,800	62,753	72,553
2016	June	5,170	---	519	5,689	61,380	67,069
2016	July	388	---	477	866	47,955	48,821
2016	August	1,395	---	769	2,164	63,079	65,244
2016	September	4,308	---	3,643	7,951	54,018	61,969
2016	October	4,595	---	1,505	6,100	62,327	68,427
2016	November	712	---	3,441	4,153	62,781	66,934
2016	December	1,850	---	4,642	6,492	55,062	61,554
2017	January	5,137	---	5,674	10,811	80,201	91,012
2017	February	3,252	---	10,776	14,028	74,867	88,896
2017	March	3,093	---	10,804	13,897	87,793	101,691
2017	April	3,269	---	6,762	10,031	80,977	91,008
2017	May	5,192	---	11,336	16,529	96,621	113,149
2017	June	7,720	---	10,746	18,466	74,120	92,585
2017	July	3,502	---	14,235	17,737	106,932	124,669
2017	August	5,092	---	8,165	13,256	77,571	90,827
2017	September	1,908	---	7,180	9,089	66,208	75,297
2017	October	4,708	---	6,081	10,789	78,916	89,705
2017	November	3,582	---	7,564	11,147	69,433	80,579
2017	December	1,784	---	6,809	8,592	59,299	67,891

Table continued.

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

Quantity in short tons

Year	Month	Oman	Pakistan	UAE	Subject sources	Nonsubject sources	All import sources
2018	January	2,960	---	7,417	10,377	85,274	95,650
2018	February	3,790	---	4,441	8,231	62,389	70,621
2018	March	2,777	189	5,622	8,587	81,913	90,500
2018	April	4,999	---	7,694	12,693	96,628	109,320
2018	May	4,778	---	9,794	14,571	51,923	66,494
2018	June	3,486	---	9,522	13,008	54,514	67,522
2018	July	4,236	---	7,866	12,102	58,544	70,646
2018	August	6,702	28	9,185	15,915	32,958	48,873
2018	September	4,746	319	6,833	11,898	52,677	64,575
2018	October	6,660	---	5,886	12,546	48,953	61,499
2018	November	5,047	---	5,445	10,492	44,931	55,423
2018	December	3,523	---	5,264	8,787	32,148	40,934
2019	January	5,535	---	11,199	16,733	45,823	62,557
2019	February	5,401	---	5,330	10,730	36,537	47,267
2019	March	3,074	26	9,569	12,668	39,375	52,044
2019	April	4,502	---	7,473	11,975	37,496	49,471
2019	May	6,882	---	6,560	13,442	48,377	61,818
2019	June	4,774	---	6,243	11,016	39,409	50,425
2019	July	5,846	---	5,780	11,626	53,883	65,509
2019	August	5,307	---	5,606	10,912	46,715	57,627
2019	September	3,262	---	6,553	9,816	37,911	47,727
2019	October	3,461	70	8,862	12,393	38,888	51,281
2019	November	4,477	---	7,817	12,294	45,813	58,106
2019	December	2,178	---	6,399	8,577	40,770	49,347

Table continued.

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

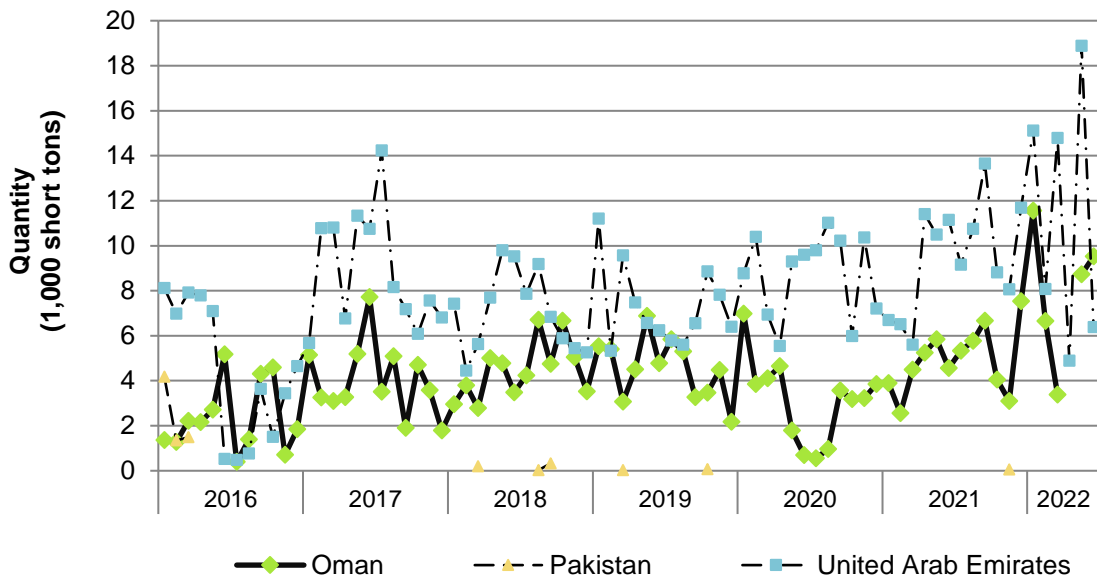
Quantity in short tons

Year	Month	Oman	Pakistan	UAE	Subject sources	Nonsubject sources	All import sources
2020	January	6,973	---	8,767	15,740	37,141	52,881
2020	February	3,843	---	10,390	14,234	30,539	44,773
2020	March	4,102	---	6,933	11,035	38,913	49,948
2020	April	4,642	---	5,542	10,183	32,826	43,010
2020	May	1,791	---	9,292	11,083	54,427	65,510
2020	June	699	---	9,598	10,297	39,110	49,406
2020	July	557	---	9,797	10,354	43,317	53,671
2020	August	963	---	11,019	11,982	41,627	53,609
2020	September	3,560	---	10,221	13,781	34,617	48,398
2020	October	3,183	---	5,983	9,166	30,035	39,201
2020	November	3,218	---	10,365	13,584	35,419	49,003
2020	December	3,843	---	7,209	11,053	27,644	38,697
2021	January	3,892	---	6,693	10,584	28,935	39,520
2021	February	2,562	---	6,515	9,077	27,975	37,052
2021	March	4,497	---	5,606	10,103	36,472	46,574
2021	April	5,250	---	11,394	16,645	34,316	50,961
2021	May	5,837	---	10,494	16,330	37,830	54,160
2021	June	4,556	---	11,144	15,700	43,467	59,166
2021	July	5,326	---	9,161	14,487	41,872	56,359
2021	August	5,774	---	10,751	16,526	37,906	54,432
2021	September	6,661	---	13,654	20,315	43,576	63,891
2021	October	4,043	---	8,815	12,858	32,183	45,041
2021	November	3,092	57	8,062	11,211	41,761	52,971
2021	December	7,528	---	11,692	19,221	44,072	63,293
2022	January	11,554	---	15,118	26,671	33,627	60,299
2022	February	6,646	---	8,071	14,717	28,456	43,174
2022	March	3,375	---	14,789	18,164	66,400	84,564
2022	April	---	---	4,889	4,889	53,092	57,981
2022	May	8,725	---	18,877	27,602	56,664	84,267
2022	June	9,529	---	6,385	15,913	54,241	70,154

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090 accessed August 30, 2022. Imports are based on the imports for consumption data series.

Figure IV-6

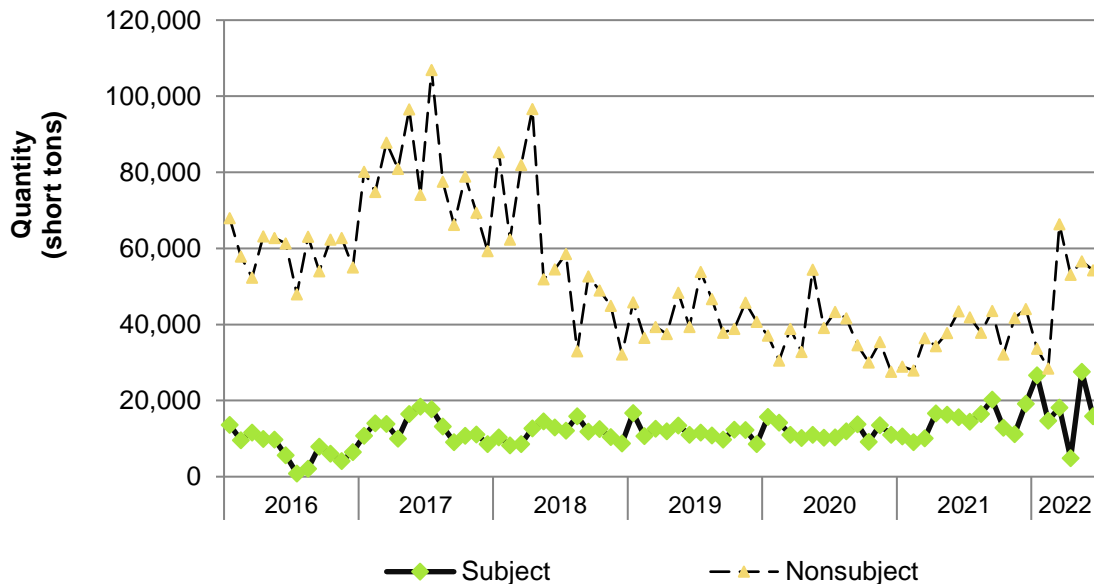
CWP: U.S. imports from individual subject sources, by month, January 2016 through June 2022



Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090 accessed August 30, 2022. Imports are based on the imports for consumption data series.

Figure IV-7

CWP: U.S. imports from aggregated subject and nonsubject sources, by month, January 2016 through June 2022



Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090 accessed August 30, 2022. Imports are based on the imports for consumption data series.

U.S. inventories of imported merchandise

Table IV-9 presents data for inventories of U.S. imports of CWP from all sources held in the United States. Inventories of imports from subject sources increased *** percent from 2016-21, but were *** percent lower in interim 2022 than in interim 2021. Inventories of imports from Oman were present in 2016, but were *** in every other period. Inventories of imports from the UAE increased *** percent from 2016-21, but were *** percent lower in interim 2022 than in interim 2021. Inventories of nonsubject imports decreased *** percent from 2016-21, and were *** percent higher in interim 2022 than in interim 2021. (Inventories of nonsubject imports comprised roughly *** of the share of total inventories in 2016, but were less than *** percent share in 2021.)

Table IV-9
CWP: U.S. importers' end-of-period inventories and their ratio to select items, by source and period

Quantity in short tons; ratio in percent

Measure	Source	2016	2017	2018
Inventories quantity	Oman	***	***	***
Ratio to imports	Oman	***	***	***
Ratio to U.S. shipments of imports	Oman	***	***	***
Ratio to total shipments of imports	Oman	***	***	***
Inventories quantity	Pakistan	***	***	***
Ratio to imports	Pakistan	***	***	***
Ratio to U.S. shipments of imports	Pakistan	***	***	***
Ratio to total shipments of imports	Pakistan	***	***	***
Inventories quantity	UAE	***	***	***
Ratio to imports	UAE	***	***	***
Ratio to U.S. shipments of imports	UAE	***	***	***
Ratio to total shipments of imports	UAE	***	***	***
Inventories quantity	Subject	***	***	***
Ratio to imports	Subject	***	***	***
Ratio to U.S. shipments of imports	Subject	***	***	***
Ratio to total shipments of imports	Subject	***	***	***
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	***	***	***
Ratio to imports	All	***	***	***
Ratio to U.S. shipments of imports	All	***	***	***
Ratio to total shipments of imports	All	***	***	***

Table continued.

Table IV-9 Continued

CWP: U.S. importers' end-of-period inventories and their ratio to select items, by source and period

Quantity in short tons; ratio in percent

Measure	Source	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Inventories quantity	Oman	***	***	***	***	***
Ratio to imports	Oman	***	***	***	***	***
Ratio to U.S. shipments of imports	Oman	***	***	***	***	***
Ratio to total shipments of imports	Oman	***	***	***	***	***
Inventories quantity	Pakistan	***	***	***	***	***
Ratio to imports	Pakistan	***	***	***	***	***
Ratio to U.S. shipments of imports	Pakistan	***	***	***	***	***
Ratio to total shipments of imports	Pakistan	***	***	***	***	***
Inventories quantity	UAE	***	***	***	***	***
Ratio to imports	UAE	***	***	***	***	***
Ratio to U.S. shipments of imports	UAE	***	***	***	***	***
Ratio to total shipments of imports	UAE	***	***	***	***	***
Inventories quantity	Subject	***	***	***	***	***
Ratio to imports	Subject	***	***	***	***	***
Ratio to U.S. shipments of imports	Subject	***	***	***	***	***
Ratio to total shipments of imports	Subject	***	***	***	***	***
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	***	***	***	***	***
Ratio to imports	All	***	***	***	***	***
Ratio to U.S. shipments of imports	All	***	***	***	***	***
Ratio to total shipments of imports	All	***	***	***	***	***

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.

U.S. importers' imports subsequent to June 2022

The Commission requested importers to indicate whether they had imported or arranged for the importation of CWP from any source for delivery after June 30, 2022. These data are presented in table IV-10.

Table IV-10
CWP: U.S. importers' arranged imports, by source and quarter

Quantity in short tons

Source	Jul-Sep 2022	Oct-Dec 2022	Jan-Mar 2023	Apr-Jun 2023	Total
Oman	***	***	***	***	***
Pakistan	***	***	***	***	***
UAE	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

The industry in Oman

Overview

During the final phase of the original investigations, the Commission received a foreign producer/exporter questionnaire from one firm, Al Jazeera Steel Products Co. SAOG ("Al Jazeera"), which accounted for approximately *** percent of CWP exports from Oman to the United States during 2015.⁶

In the current proceeding, the Commission issued questionnaires to three producer/exporters in Oman and received responses from one firm, Al Jazeera. This firm accounted for *** CWP production in Oman in 2021.⁷ Table IV-11 presents summary information on the CWP operations of the responding producer in Oman.

⁶ Investigation Nos. 731-TA-549 and 701-TA-1299, 1300, 1302, and 1303 (Final): Circular Welded Carbon-Quality Steel Pipe from Oman, Pakistan, the United Arab Emirates, and Vietnam, Confidential Report, INV-OO-102, November 7, 2016 ("Original confidential report"), p. VII-3.

⁷ Al Jazeera reported it accounted for *** percent of CWP production in Oman in its questionnaire.

Table IV-11
CWP: Summary data for the producer in Oman, 2021

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Al Jazeera	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Changes in operations

Al Jazeera did not report any changes in operations or anticipated changes in operations in its questionnaire response. Table IV-12 presents developments in the CWP industry in Oman since the imposition of the antidumping duty order reported in public sources.

Table IV-12
CWP: Recent developments in the industry in Oman

Item	Firm	Event
Upgrades	Al Jazeera	In its 2020 annual report, Al Jazeera reported that, despite disruptions during the pandemic, it has been slowly and steadily continuing with incremental upgrade plans at its mill in Suhar, with a focus on the future beyond the pandemic. In 2021, Al Jazeera's Tube Mill division produced and sold 194,606 short tons of tube products (including CWP) compared to 216,008 short tons in 2020. Tube mill volumes were "affected by supply disruptions and a general lack of demand due to a slowdown in construction projects."

Source: Cited publications and responses to the notice of institution. Al Jazeera Steel Products Co., "Annual Report—2020," January 31, 2021, <https://www.jazeerasteel.com/images/pdf/Annualreport2020English.pdf>, pp. 6, 8.

Operations on CWP

Table IV-13 presents data on Al Jazeera's CWP operations in Oman. Capacity remained constant in each year from 2016 to 2021.⁸ Production fluctuated over the period but generally increased by *** percent from 2016-21. Consequently, Al Jazeera's capacity utilization increased by *** percentage points during 2016-2021.

⁸ Al Jazeera did not provide data for the 2021 and 2022 interim periods in its response despite staff attempts to gather that information. Staff assumed that interim data for 2021 was half of the full year 2021 data provided, and copied that estimated interim 2021 data into the interim 2022 period.

While Al Jazeera’s home market shipments (which were *** commercial shipments) increased *** percent from 2016-21, the share of its total shipments held by home market shipments declined from *** percent in 2016 to *** percent in 2021. Total export shipments increased *** percent from 2016-21, and as a share of total shipments increased from *** percent in 2016 to *** percent in 2021. End-of-period inventories increased by *** percent from 2016-21.

Table IV-13
CWP: Data on industry in Oman, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2016	2017	2018
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***

Table continued.

Table IV-13 Continued
CWP: Data on industry in Oman, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-13 Continued
CWP: Data on industry in Oman, by period

Unit values in dollars per short ton; ratios and shares in percent

Item	Measure	2016	2017	2018
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export shipments	Share	***	***	***
Total shipments	Share	***	***	***

Table continued.

Table IV-13 Continued
CWP: Data on industry in Oman, by period

Unit values in dollars per short ton; ratios and shares in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

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

Note: Since Al Jazeera did not provide data for interim 2021 and 2022, staff assumed that interim data for 2021 was half of the full year 2021 data provided, and copied that estimated interim 2021 data into the interim 2022 period.

Table IV-14 presents more detailed data on Al Jazeera's export shipments by destination market and period. Al Jazeera's exports to the United States increased *** percent from 2016-21, increasing from a *** percent share of total exports in 2016 to a *** percent share in 2021. Al Jazeera *** exports to European Union or Asian markets. Its exports to all other markets (which it identified as including ***) increased *** percent from 2016-21, but decreased from a *** percent share of total exports in 2016 to a *** percent share in 2021.

Table IV-14**CWP: Omani producer's export shipments, by destination market and period**

Quantity in short tons; value in 1,000 dollars; unit values in dollars per short ton

Destination market	Measure	2016	2017	2018
United States	Quantity	***	***	***
European Union markets	Quantity	***	***	***
Asia markets	Quantity	***	***	***
All other markets	Quantity	***	***	***
Non-US destination markets	Quantity	***	***	***
All destination markets	Quantity	***	***	***
United States	Value	***	***	***
European Union markets	Value	***	***	***
Asia markets	Value	***	***	***
All other markets	Value	***	***	***
Non-US destination markets	Value	***	***	***
All destination markets	Value	***	***	***
United States	Unit value	***	***	***
European Union markets	Unit value	***	***	***
Asia markets	Unit value	***	***	***
All other markets	Unit value	***	***	***
Non-US destination markets	Unit value	***	***	***
All destination markets	Unit value	***	***	***

Table continued.

Table IV-14 Continued
CWP: Omani producer's export shipments, by destination market and period

Quantity in short tons; value in 1,000 dollars; unit values in dollars per short ton

Destination market	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
United States	Quantity	***	***	***	***	***
European Union markets	Quantity	***	***	***	***	***
Asia markets	Quantity	***	***	***	***	***
All other markets	Quantity	***	***	***	***	***
Non-US destination markets	Quantity	***	***	***	***	***
All destination markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
European Union markets	Value	***	***	***	***	***
Asia markets	Value	***	***	***	***	***
All other markets	Value	***	***	***	***	***
Non-US destination markets	Value	***	***	***	***	***
All destination markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
European Union markets	Unit value	***	***	***	***	***
Asia markets	Unit value	***	***	***	***	***
All other markets	Unit value	***	***	***	***	***
Non-US destination markets	Unit value	***	***	***	***	***
All destination markets	Unit value	***	***	***	***	***

Table continued.

Table IV-14 Continued
CWP: Omani producer's export shipments, by destination market and period

Shares and ratio in percent, ratios are based on quantity of total shipments

Destination market	Measure	2016	2017	2018
United States	Share of quantity	***	***	***
European Union markets	Share of quantity	***	***	***
Asia markets	Share of quantity	***	***	***
All other markets	Share of quantity	***	***	***
Non-US destination markets	Share of quantity	***	***	***
All destination markets	Share of quantity	***	***	***
United States	Share of value	***	***	***
European Union markets	Share of value	***	***	***
Asia markets	Share of value	***	***	***
All other markets	Share of value	***	***	***
Non-US destination markets	Share of value	***	***	***
All destination markets	Share of value	***	***	***
United States	Ratio	***	***	***
European Union markets	Ratio	***	***	***
Asia markets	Ratio	***	***	***
All other markets	Ratio	***	***	***
Non-US destination markets	Ratio	***	***	***
All destination markets	Ratio	***	***	***

Table continued.

Table IV-14 Continued
CWP: Omani producer’s export shipments, by destination market and period

Shares and ratio in percent, ratios are based on quantity of total shipments

Destination market	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
United States	Share of quantity	***	***	***	***	***
European Union markets	Share of quantity	***	***	***	***	***
Asia markets	Share of quantity	***	***	***	***	***
All other markets	Share of quantity	***	***	***	***	***
Non-US destination markets	Share of quantity	***	***	***	***	***
All destination markets	Share of quantity	***	***	***	***	***
United States	Share of value	***	***	***	***	***
European Union markets	Share of value	***	***	***	***	***
Asia markets	Share of value	***	***	***	***	***
All other markets	Share of value	***	***	***	***	***
Non-US destination markets	Share of value	***	***	***	***	***
All destination markets	Share of value	***	***	***	***	***
United States	Ratio	***	***	***	***	***
European Union markets	Ratio	***	***	***	***	***
Asia markets	Ratio	***	***	***	***	***
All other markets	Ratio	***	***	***	***	***
Non-US destination markets	Ratio	***	***	***	***	***
All destination markets	Ratio	***	***	***	***	***

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

Note: Since Al Jazeera did not provide data for interim 2021 and 2022, staff assumed that interim data for 2021 was half of the full year 2021 data provided, and copied that estimated interim 2021 data into the interim 2022 period.

Alternative products

As shown in table IV-15, Al Jazeera produced other products on the same equipment and machinery used to produce CWP, including “***”. Al Jazeera’s overall capacity remained unchanged from 2016-21. The share of its production attributable to CWP increased from *** percent in 2016 to *** percent in 2021. The share of its production attributable to other products decreased from *** percent in 2016 to *** percent in 2021.

Table IV-15

CWP: Producer in Oman's overall capacity and production on the same equipment as in-scope production, by period, 2016-21, January to June 2021, and January to June 2022

Quantity in short tons; shares and ratio in percent

Item	Measure	2016	2017	2018
Overall capacity	Quantity	***	***	***
Production: CWP	Quantity	***	***	***
Production: Line pipe <=16 OD	Quantity	***	***	***
Production: Line pipe >16 OD	Quantity	***	***	***
Production: Mechanical tubing	Quantity	***	***	***
Production: OCTG	Quantity	***	***	***
Production: Other products	Quantity	***	***	***
Production: All out-of-scope products	Quantity	***	***	***
Production: All products	Quantity	***	***	***
Overall capacity utilization	Ratio	***	***	***
Production: CWP	Share	***	***	***
Production: Line pipe <=16 OD	Share	***	***	***
Production: Line pipe >16 OD	Share	***	***	***
Production: Mechanical tubing	Share	***	***	***
Production: OCTG	Share	***	***	***
Production: Other products	Share	***	***	***
Production: All out-of-scope products	Share	***	***	***
Production: All products	Share	***	***	***

Table continued.

Table IV-15 Continued

CWP: Producer in Oman’s overall capacity and production on the same equipment as in-scope production, by period, 2016-21, January to June 2021, and January to June 2022

Quantity in short tons; shares and ratio in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2021
Overall capacity	Quantity	***	***	***	***	***
Production: CWP	Quantity	***	***	***	***	***
Production: Line pipe <=16 OD	Quantity	***	***	***	***	***
Production: Line pipe >16 OD	Quantity	***	***	***	***	***
Production: Mechanical tubing	Quantity	***	***	***	***	***
Production: OCTG	Quantity	***	***	***	***	***
Production: Other products	Quantity	***	***	***	***	***
Production: All out-of-scope products	Quantity	***	***	***	***	***
Production: All products	Quantity	***	***	***	***	***
Overall capacity utilization	Ratio	***	***	***	***	***
Production: CWP	Share	***	***	***	***	***
Production: Line pipe <=16 OD	Share	***	***	***	***	***
Production: Line pipe >16 OD	Share	***	***	***	***	***
Production: Mechanical tubing	Share	***	***	***	***	***
Production: OCTG	Share	***	***	***	***	***
Production: Other products	Share	***	***	***	***	***
Production: All out-of-scope products	Share	***	***	***	***	***
Production: All products	Share	***	***	***	***	***

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

Note: Since Al Jazeera did not provide data for interim 2021 and 2022, staff assumed that interim data for 2021 was half of the full year 2021 data provided, and copied that estimated interim 2021 data into the interim 2022 period.

Exports

According to GTA, the leading export markets for welded tubes, pipes, and hollow profiles of iron or nonalloy steel, a category that includes CWP and out-of-scope products, from Oman are the United States, the UAE, and Qatar (table IV-16). During 2021, the United States was the top export market for CWP from Oman, accounting for 60.2 percent, followed by the UAE, accounting for 27.3 percent, and then by Qatar, accounting for 10.2 percent.

Table IV-16
Welded tubes, pipes, and hollow profiles of iron or nonalloy steel: Exports from Oman, by destination market and period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2016	2017	2018	2019	2020	2021
United States	Quantity	28,188	48,239	53,704	54,699	37,375	59,018
United Arab Emirates	Quantity	55	2,722	573	1,978	44	26,815
Qatar	Quantity	72	29	---	---	1,168	9,964
United Kingdom	Quantity	---	---	---	---	280	1,965
Egypt	Quantity	---	---	---	---	32	174
India	Quantity	---	---	---	442	56	89
Mauritius	Quantity	---	---	---	---	---	23
Tanzania	Quantity	---	---	---	---	---	4
Rwanda	Quantity	---	---	---	---	---	0
All other markets	Quantity	2,325	2,155	997	657	349	0
Non-US destination markets	Quantity	2,452	4,907	1,570	3,076	1,929	39,033
All exporter markets	Quantity	30,641	53,146	55,274	57,775	39,304	98,052
United States	Value	13,897	29,681	36,328	35,270	21,013	51,360
United Arab Emirates	Value	47	1,400	446	1,405	28	24,426
Qatar	Value	34	17	---	---	533	10,243
United Kingdom	Value	---	---	---	---	195	1,617
Egypt	Value	---	---	69	---	19	378
India	Value	---	---	---	186	21	41
Mauritius	Value	---	---	---	---	---	19
Tanzania	Value	---	---	---	---	---	18
Rwanda	Value	---	---	---	---	---	0
All other markets	Value	1,224	1,367	689	484	306	0
Non-US destination markets	Quantity	1,304	2,783	1,204	2,075	1,101	36,741
All exporter markets	Value	15,202	32,464	37,533	37,345	22,114	88,102

Table continued.

Table IV-16 Continued**Welded tubes, pipes, and hollow profiles of iron or nonalloy steel: Exports from Oman, by destination market and period**

Unit values in dollars per short ton; shares in percent

Destination market	Measure	2016	2017	2018	2019	2020	2021
United States	Unit value	493	615	676	645	562	870
United Arab Emirates	Unit value	849	514	778	710	647	911
Qatar	Unit value	473	575	---	---	456	1,028
United Kingdom	Unit value	---	---	---	---	695	823
Egypt	Unit value	---	---	---	---	580	2,173
India	Unit value	---	---	---	420	378	459
Mauritius	Unit value	---	---	---	---	---	838
Tanzania	Unit value	---	---	---	---	---	4,829
Rwanda	Unit value	---	---	---	---	---	932
All other markets	Unit value	526	634	691	737	875	6,800
Non-US destination markets	Unit value	532	567	767	674	571	941
All exporter markets	Unit value	496	611	679	646	563	899
United States	Share of quantity	92.0	90.8	97.2	94.7	95.1	60.2
United Arab Emirates	Share of quantity	0.2	5.1	1.0	3.4	0.1	27.3
Qatar	Share of quantity	0.2	0.1	---	---	3.0	10.2
United Kingdom	Share of quantity	---	---	---	---	0.7	2.0
Egypt	Share of quantity	---	---	---	---	0.1	0.2
India	Share of quantity	---	---	---	0.8	0.1	0.1
Mauritius	Share of quantity	---	---	---	---	---	0.0
Tanzania	Share of quantity	---	---	---	---	---	0.0
Rwanda	Share of quantity	---	---	---	---	---	0.0
All other markets	Share of quantity	7.6	4.1	1.8	1.1	0.9	0.0
Non-US destination markets	Share of quantity	8.0	9.2	2.8	5.3	4.9	39.8
All exporter markets	Share of quantity	100.0	100.0	100.0	100.0	100.0	100.0

Source: Official imports statistics of imports from Oman (constructed export statistics for Oman) under HS subheading 7306.30 as reported by various statistical reporting authorities in the Global Trade Atlas database, accessed September 7, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, and all remaining top export destinations shown in descending order of 2021 data.

The industry in Pakistan

Overview

During the final phase of the original investigations, the Commission received a foreign producer/exporter questionnaire from one firm in Pakistan, International Industries Limited, which accounted for approximately *** percent of CWP exports from Pakistan to the United States during 2015.⁹

In the current proceeding, the Commission issued questionnaires to 10 producer/exporters in Pakistan but did not receive any responses. There were no reported major developments in the Pakistani CWP industry since the imposition of the antidumping duty order identified by interested parties in this proceeding.¹⁰ Exports from Pakistan to the U.S. have dropped considerably since 2016. U.S. imports from Pakistan, which had totaled *** short tons in 2015,¹¹ totaled only 57 tons in 2021.

Exports

According to GTA, the leading export markets for welded tubes, pipes, and hollow profiles of iron or nonalloy steel, a category that includes CWP and out-of-scope products, from Pakistan are Australia, Sri Lanka, and Germany (table IV-17). During 2021, Australia was the top export market for CWP from Pakistan, accounting for 54.9 percent, followed by Sri Lanka, accounting for 15.0 percent, and then by Germany, accounting for 9.1 percent.

⁹ Original confidential report, p. VII-10.

¹⁰ Though not limited to CWP, domestic producers in their response to the notice of institution noted a scholarly article that describes rapid growth in the overall steel industry in Pakistan since 2015. Domestic producers' response to the notice of institution, pp. 16-17.

¹¹ Original confidential report, p. IV-6.

Table IV-17**Welded tubes, pipes, and hollow profiles of iron or nonalloy steel: Exports from Pakistan, by destination market and period**

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2016	2017	2018	2019	2020	2021
United States	Quantity	7,010	---	535	95	---	57
Australia	Quantity	10,665	14,411	12,767	6,090	7,369	14,992
Sri Lanka	Quantity	19,651	14,584	5,663	5,280	7,985	4,096
Germany	Quantity	2,881	245	694	1,680	2,285	2,478
Canada	Quantity	11,174	13,892	14,996	5,154	165	1,645
Belgium	Quantity	548	1,298	4,068	1,775	2,062	1,455
United Kingdom	Quantity	869	269	360	772	---	1,335
Qatar	Quantity	---	54	1,764	630	465	565
Ireland	Quantity	109	27	---	767	87	258
All other exporters	Quantity	304	1,370	1,135	756	553	418
Non-US destination markets	Quantity	46,201	46,150	41,446	22,905	20,970	27,241
All reporting exporters	Quantity	53,211	46,150	41,982	23,001	20,970	27,298
United States	Value	3,360	---	388	58	---	44
Australia	Value	6,168	9,615	8,588	4,027	4,239	12,857
Sri Lanka	Value	13,465	10,766	4,582	4,038	5,290	3,646
Germany	Value	1,351	163	521	1,210	1,397	1,984
Canada	Value	6,641	9,611	10,981	3,319	107	1,951
Belgium	Value	283	835	3,221	1,242	1,283	1,079
United Kingdom	Value	474	185	280	640	---	1,152
Qatar	Value	---	35	1,128	399	290	494
Ireland	Value	65	19	---	535	56	276
All other exporters	Value	173	852	931	510	373	430
Non-US destination markets	Value	28,620	32,080	30,231	15,921	13,036	23,870
All reporting exporters	Value	31,981	32,080	30,618	15,980	13,036	23,914

Table continued.

Table IV-17 Continued**Welded tubes, pipes, and hollow profiles of iron or nonalloy steel: Exports from Pakistan, by destination market and period**

Unit values in dollars per short ton; shares in percent

Destination market	Measure	2016	2017	2018	2019	2020	2021
United States	Unit value	479	---	724	609	---	771
Australia	Unit value	578	667	673	661	575	858
Sri Lanka	Unit value	685	738	809	765	663	890
Germany	Unit value	469	664	751	720	611	801
Canada	Unit value	594	692	732	644	647	1,186
Belgium	Unit value	516	643	792	700	622	742
United Kingdom	Unit value	546	689	777	829	---	863
Qatar	Unit value	---	656	639	634	624	875
Ireland	Unit value	594	674	---	697	649	1,071
All other exporters	Unit value	570	622	820	674	676	1,029
Non-US destination markets	Unit value	619	695	729	695	622	876
All reporting exporters	Unit value	601	695	729	695	622	876
United States	Share of quantity	13.2	---	1.3	0.4	---	0.2
Australia	Share of quantity	20.0	31.2	30.4	26.5	35.1	54.9
Sri Lanka	Share of quantity	36.9	31.6	13.5	23.0	38.1	15.0
Germany	Share of quantity	5.4	0.5	1.7	7.3	10.9	9.1
Canada	Share of quantity	21.0	30.1	35.7	22.4	0.8	6.0
Belgium	Share of quantity	1.0	2.8	9.7	7.7	9.8	5.3
United Kingdom	Share of quantity	1.6	0.6	0.9	3.4	---	4.9
Qatar	Share of quantity	---	0.1	4.2	2.7	2.2	2.1
Ireland	Share of quantity	0.2	0.1	---	3.3	0.4	0.9
All other exporters	Share of quantity	0.6	3.0	2.7	3.3	2.6	1.5
Non-US destination markets	Share of quantity	86.8	100.0	98.7	99.6	100.0	99.8
All reporting exporters	Share of quantity	100.0	100.0	100.0	100.0	100.0	100.0

Source: Official imports statistics of imports from Pakistan (constructed export statistics for Pakistan) under HS subheading 7306.30 as reported by various statistical reporting authorities in the Global Trade Atlas database, accessed September 7, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, and all remaining top export destinations shown in descending order of 2021 data.

The industry in the UAE

Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaire from six firms, which accounted for approximately *** percent of CWP exports from the UAE to the United States during 2015.¹²

In the current proceeding, the Commission issued questionnaires to 14 producer/exporters in the UAE and received responses from 6 firms.¹³ These firms are estimated to account for 72.8 of CWP production in the UAE in 2021.¹⁴ Table IV-18 presents summary information on the CWP operations of the responding producers in the UAE.

Table IV-18
CWP: Summary data for producers in the UAE, 2021

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Ajmal	***	***	***	***	***	***
KD Industries	***	***	***	***	***	***
KHK	***	***	***	***	***	***
TSI Metal	***	***	***	***	***	***
THL	***	***	***	***	***	***
Universal	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Changes in operations

As presented in table IV-19 producers in the UAE reported several operational and organizational changes since January 1, 2016.

¹² Original confidential report, p. VII-17.

¹³ KHK, THL, and Universal are related foreign producers in the UAE.

¹⁴ This figure is derived from the collective firms' responses estimating the share of production they accounted for in the UAE.

Table IV-19
CWP: Reported changes in operations in the UAE, since January 1, 2016, by firm

Item	Firm name and narrative on changes in operations
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Prolonged shutdowns or curtailments	***
Other	***
Other	***

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

Since the original investigations, respondents reported several changes that affected the CWP market in the UAE. Imports from China decreased by approximately 50 percent over the last three to four years as a result of new commercial conditions (i.e., lead time, increase use of ocean freight, etc.).¹⁵ Consequently, UAE producers increased their market share in the UAE market for CWP, resulting in an increase in domestic demand. The UAE government also adopted economic incentive programs designed to foster local production and fuel the domestic economy. These incentives included initiatives to procure locally manufactured CWP. Respondents also mentioned increased demand for CWP from Gulf Cooperation Council (GCC) countries during the past three to four years due to numerous new commercial and industrial projects in development.¹⁶ Table IV-20 presents developments in the CWP industry in the UAE since the imposition of the antidumping duty order.

¹⁵ Respondent Ajmal’s response to the notice of institution, December 1, 2021, pp. 8-9; Universal’s response to notice of institution, December 1, 2021, pp. 11-12; Universal’s response to notice of institution, December 1, 2021, pp. 11-12.

¹⁶ Respondent Ajmal’s response to the notice of institution, December 1, 2021, pp. 8-9; Universal’s response to notice of institution, December 1, 2021, pp. 11-12; Universal’s response to notice of institution, December 1, 2021, pp. 11-12.

Table IV-20
CWP: Recent developments in the UAE industry

Item	Firm	Event
Plant opening	Conares	In 2018, the UAE's second largest private steel manufacturer, Conares, opened a new 12-inch pipe mill in Dubai's Jebel Ali Free Zone, which reportedly increased its annual pipe manufacturing capacity by 276,000 short tons.
Capital investment/expansion	Ajmal	In February 2020, CWP producer Ajmal announced that it installed new equipment that expanded its tubular product range and reportedly increased its annual pipe and tube production capacity from 276,000 to 386,000 short tons.

Source: Cited publications and responses to the notice of institution (see footnotes below). Technical Review: Middle East, "Steel firm Conares opens new facility in JAFZA," May 15, 2018, <https://www.technicalreviewmiddleeast.com/manufacturing/metals/steel-firm-conares-opens-new-facility-in-jafza>. Steel Orbis, "UAE's HR feedstock imports to increase in 2020," February 10, 2020, <https://www.steelorbis.com/steel-news/latest-news/uaes-hr-feedstock-imports-to-increase-in-2020-1131780.htm>.

Operations on CWP

Table IV-21 presents data on CWP operations in the UAE. Capacity increased by *** percent 2016-21 and was *** percent lower in interim 2022 than in interim 2021. Production fluctuated over the period but generally increased by *** percent from 2016-21 and was *** percent lower in interim 2022 than in interim 2021. Consequently, capacity utilization decreased by *** percentage points during 2016-2021. Capacity utilization was *** percent lower in interim 2022 than in interim 2021.

Home market shipments from producers in the UAE decreased by *** percent from 2016-21 but were *** percent higher in interim 2022 than in interim 2021. The share of its total shipments held by home market shipments declined from *** percent in 2016 to *** percent in 2021. (As a share of total shipments, most home market shipments were commercial shipments. The share of total shipments attributable to internal consumption and transfers was no more than ten percent in any period.)

Total export shipments increased by *** percent from 2016-21, but were *** percent lower in interim 2022 than in interim 2021. As a share of total shipments, total exports increased from *** percent in 2016 to *** percent in 2021. End-of-period inventories increased by *** percent from 2016-21, but were *** percent lower in interim 2022 than in interim 2021.

Table IV-21
CWP: Data on industry in the UAE, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2016	2017	2018
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***

Table continued.

Table IV-21 Continued
CWP: Data on industry in the UAE, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-21 Continued
CWP: Data on industry in the UAE, by period

Unit values in dollars per short ton; ratios and shares in percent

Item	Measure	2016	2017	2018
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export shipments	Share	***	***	***
Total shipments	Share	***	***	***

Table continued.

Table IV-21 Continued
CWP: Data on industry in the UAE, by period

Unit values in dollars per short ton; ratios and shares in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

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

Table IV-22 presents more detailed data on UAE producers' export shipments by destination market and period. UAE producers' exports to the United States increased by *** percent from 2016-21, but were *** percent lower in interim 2022 than in interim 2021. Exports to the United States increased from a *** percent share of total exports in 2016 to a *** percent share in 2021. The highest share of total exports in 2021 (*** percent) was to all other markets (other than the U.S., the European Union, and Asian markets), including ***. These exports increased *** percent from 2016-21 and were *** percent lower in interim 2022 than in interim 2021.

Table IV-22
CWP: UAE producers' export shipments, by destination market and period

Quantity in short tons; value in 1,000 dollars; unit values in dollars per short ton

Destination market	Measure	2016	2017	2018
United States	Quantity	***	***	***
European Union markets	Quantity	***	***	***
Asia markets	Quantity	***	***	***
All other markets	Quantity	***	***	***
Non-US destination markets	Quantity	***	***	***
All destination markets	Quantity	***	***	***
United States	Value	***	***	***
European Union markets	Value	***	***	***
Asia markets	Value	***	***	***
All other markets	Value	***	***	***
Non-US destination markets	Value	***	***	***
All destination markets	Value	***	***	***
United States	Unit value	***	***	***
European Union markets	Unit value	***	***	***
Asia markets	Unit value	***	***	***
All other markets	Unit value	***	***	***
Non-US destination markets	Unit value	***	***	***
All destination markets	Unit value	***	***	***

Table continued.

Table IV-22 Continued
CWP: UAE producers' export shipments, by destination market and period

Quantity in short tons; value in 1,000 dollars; unit values in dollars per short ton

Destination market	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
United States	Quantity	***	***	***	***	***
European Union markets	Quantity	***	***	***	***	***
Asia markets	Quantity	***	***	***	***	***
All other markets	Quantity	***	***	***	***	***
Non-US destination markets	Quantity	***	***	***	***	***
All destination markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
European Union markets	Value	***	***	***	***	***
Asia markets	Value	***	***	***	***	***
All other markets	Value	***	***	***	***	***
Non-US destination markets	Value	***	***	***	***	***
All destination markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
European Union markets	Unit value	***	***	***	***	***
Asia markets	Unit value	***	***	***	***	***
All other markets	Unit value	***	***	***	***	***
Non-US destination markets	Unit value	***	***	***	***	***
All destination markets	Unit value	***	***	***	***	***

Table continued.

Table IV-22 Continued
CWP: UAE producers' export shipments, by destination market and period

Shares and ratio in percent, ratios are based on quantity of total shipments

Destination market	Measure	2016	2017	2018
United States	Share of quantity	***	***	***
European Union markets	Share of quantity	***	***	***
Asia markets	Share of quantity	***	***	***
All other markets	Share of quantity	***	***	***
Non-US destination markets	Share of quantity	***	***	***
All destination markets	Share of quantity	***	***	***
United States	Share of value	***	***	***
European Union markets	Share of value	***	***	***
Asia markets	Share of value	***	***	***
All other markets	Share of value	***	***	***
Non-US destination markets	Share of value	***	***	***
All destination markets	Share of value	***	***	***
United States	Ratio	***	***	***
European Union markets	Ratio	***	***	***
Asia markets	Ratio	***	***	***
All other markets	Ratio	***	***	***
Non-US destination markets	Ratio	***	***	***
All destination markets	Ratio	***	***	***

Table continued.

Table IV-22 Continued
CWP: UAE producers' export shipments, by destination market and period

Shares and ratio in percent, ratios are based on quantity of total shipments

Destination market	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
United States	Share of quantity	***	***	***	***	***
European Union markets	Share of quantity	***	***	***	***	***
Asia markets	Share of quantity	***	***	***	***	***
All other markets	Share of quantity	***	***	***	***	***
Non-US destination markets	Share of quantity	***	***	***	***	***
All destination markets	Share of quantity	***	***	***	***	***
United States	Share of value	***	***	***	***	***
European Union markets	Share of value	***	***	***	***	***
Asia markets	Share of value	***	***	***	***	***
All other markets	Share of value	***	***	***	***	***
Non-US destination markets	Share of value	***	***	***	***	***
All destination markets	Share of value	***	***	***	***	***
United States	Ratio	***	***	***	***	***
European Union markets	Ratio	***	***	***	***	***
Asia markets	Ratio	***	***	***	***	***
All other markets	Ratio	***	***	***	***	***
Non-US destination markets	Ratio	***	***	***	***	***
All destination markets	Ratio	***	***	***	***	***

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

Alternative products

As shown in table IV-23, producers in the UAE produced other products on the same equipment and machinery used to produce CWP, including ***. Overall capacity increased by *** percent from 2016-21 but was *** percent lower in interim 2022 than in interim 2021. The share of its production attributable to CWP decreased from *** percent in 2016 to *** percent in 2021. The share of production attributable to all other products increased from *** percent in 2016 to *** percent in 2021.

Table IV-23

CWP: Overall capacity and production on the same equipment as in-scope production in the UAE, by period, 2016-21, January to June 2021, and January to June 2022

Quantity in short tons; shares and ratio in percent

Item	Measure	2016	2017	2018
Overall capacity	Quantity	***	***	***
Production: CWP	Quantity	***	***	***
Production: Line pipe <=16 OD	Quantity	***	***	***
Production: Line pipe >16 OD	Quantity	***	***	***
Production: Mechanical tubing	Quantity	***	***	***
Production: OCTG	Quantity	***	***	***
Production: Other products	Quantity	***	***	***
Production: All out-of-scope products	Quantity	***	***	***
Production: All products	Quantity	***	***	***
Overall capacity utilization	Ratio	***	***	***
Production: CWP	Share	***	***	***
Production: Line pipe <=16 OD	Share	***	***	***
Production: Line pipe >16 OD	Share	***	***	***
Production: Mechanical tubing	Share	***	***	***
Production: OCTG	Share	***	***	***
Production: Other products	Share	***	***	***
Production: All out-of-scope products	Share	***	***	***
Production: All products	Share	***	***	***

Table continued.

Table IV-23 Continued

CWP: Overall capacity and production on the same equipment as in-scope production in the UAE, by period, 2016-21, January to June 2021, and January to June 2022

Quantity in short tons; shares and ratio in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2021
Overall capacity	Quantity	***	***	***	***	***
Production: CWP	Quantity	***	***	***	***	***
Production: Line pipe <=16 OD	Quantity	***	***	***	***	***
Production: Line pipe >16 OD	Quantity	***	***	***	***	***
Production: Mechanical tubing	Quantity	***	***	***	***	***
Production: OCTG	Quantity	***	***	***	***	***
Production: Other products	Quantity	***	***	***	***	***
Production: All out-of-scope products	Quantity	***	***	***	***	***
Production: All products	Quantity	***	***	***	***	***
Overall capacity utilization	Ratio	***	***	***	***	***
Production: CWP	Share	***	***	***	***	***
Production: Line pipe <=16 OD	Share	***	***	***	***	***
Production: Line pipe >16 OD	Share	***	***	***	***	***
Production: Mechanical tubing	Share	***	***	***	***	***
Production: OCTG	Share	***	***	***	***	***
Production: Other products	Share	***	***	***	***	***
Production: All out-of-scope products	Share	***	***	***	***	***
Production: All products	Share	***	***	***	***	***

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.

Exports

According to GTA, the leading export markets for welded tubes, pipes, and hollow profiles of iron or nonalloy steel, a category that includes CWP and out-of-scope products, from the UAE are the United States, Canada, and Oman (table IV-24). During 2021, the United States was the top export market for CWP from the UAE, accounting for 53.7 percent, followed by Canada, accounting for 24.4 percent, and then by Oman, accounting for 3.7 percent.

Table IV-24
Welded tubes, pipes, and hollow profiles of iron or nonalloy steel: Exports from the UAE, by destination market and period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2016	2017	2018	2019	2020	2021
United States	Quantity	52,872	106,186	84,969	87,401	105,116	114,020
Canada	Quantity	371	3,152	2,704	23,769	33,191	51,771
Oman	Quantity	6,316	9,669	8,319	6,696	5,463	7,949
Italy	Quantity	---	0	1,173	2,658	578	6,040
Netherlands	Quantity	4,155	7,126	12,159	10,599	1,749	5,883
Belgium	Quantity	2,040	1,394	3,296	4,296	3,149	5,622
United Kingdom	Quantity	6,130	2,766	5,876	15,083	17,862	3,755
India	Quantity	417	510	406	282	443	3,288
Ireland	Quantity	267	113	463	241	396	2,982
All other markets	Quantity	33,877	38,681	28,744	31,430	16,463	10,911
Non-US destination markets	Quantity	53,572	63,412	63,139	95,056	79,294	98,201
All exporter markets	Quantity	106,445	169,598	148,108	182,457	184,410	212,221
United States	Value	29,360	73,075	63,611	63,727	64,692	94,826
Canada	Value	226	2,317	2,539	16,803	23,813	52,332
Oman	Value	3,718	7,671	7,077	5,259	3,932	8,247
Italy	Value	---	1	977	2,112	418	5,506
Netherlands	Value	2,267	5,132	9,968	8,164	1,262	5,950
Belgium	Value	1,132	1,001	2,704	3,223	2,174	4,758
United Kingdom	Value	3,470	1,900	4,615	10,468	10,666	3,755
India	Value	167	186	192	136	421	1,162
Ireland	Value	174	80	400	194	261	2,414
All other markets	Value	21,445	26,718	26,286	23,065	13,424	12,994
Non-US destination markets	Value	32,598	45,005	54,758	69,424	56,371	97,118
All exporter markets	Value	61,959	118,079	118,369	133,151	121,063	191,945

Table continued.

Table IV-24 Continued**Welded tubes, pipes, and hollow profiles of iron or nonalloy steel: Exports from the UAE, by destination market and period**

Unit values in dollars per short ton; shares in percent

Destination market	Measure	2016	2017	2018	2019	2020	2021
United States	Unit value	555	688	749	729	615	832
Canada	Unit value	608	735	939	707	717	1,011
Oman	Unit value	589	793	851	785	720	1,038
Italy	Unit value	---	17,540	833	794	723	912
Netherlands	Unit value	546	720	820	770	721	1,011
Belgium	Unit value	555	718	820	750	690	846
United Kingdom	Unit value	566	687	785	694	597	1,000
India	Unit value	401	364	473	482	951	353
Ireland	Unit value	651	703	864	806	660	810
All other markets	Unit value	633	691	914	734	815	1,191
Non-US destination markets	Unit value	608	710	867	730	711	989
All exporter markets	Unit value	582	696	799	730	656	904
United States	Share of quantity	49.7	62.6	57.4	47.9	57.0	53.7
Canada	Share of quantity	0.3	1.9	1.8	13.0	18.0	24.4
Oman	Share of quantity	5.9	5.7	5.6	3.7	3.0	3.7
Italy	Share of quantity	---	0.0	0.8	1.5	0.3	2.8
Netherlands	Share of quantity	3.9	4.2	8.2	5.8	0.9	2.8
Belgium	Share of quantity	1.9	0.8	2.2	2.4	1.7	2.6
United Kingdom	Share of quantity	5.8	1.6	4.0	8.3	9.7	1.8
India	Share of quantity	0.4	0.3	0.3	0.2	0.2	1.5
Ireland	Share of quantity	0.3	0.1	0.3	0.1	0.2	1.4
All other markets	Share of quantity	31.8	22.8	19.4	17.2	8.9	5.1
Non-US destination markets	Share of quantity	50.3	37.4	42.6	52.1	43.0	46.3
All exporter markets	Share of quantity	100.0	100.0	100.0	100.0	100.0	100.0

Source: Official imports statistics of imports from the UAE (constructed export statistics for the UAE) under HS subheading 7306.30 as reported by various statistical reporting authorities in the Global Trade Atlas database, accessed September 7, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, and all remaining top export destinations shown in descending order of 2021 data.

Subject countries combined

Tables IV-25 and IV-26 present summary data on CWP operations of the reporting subject producers in the subject countries.

Table IV-25
CWP: Data on the industry in subject countries, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2016	2017	2018
Capacity	Quantity	771,873	834,816	887,726
Production	Quantity	497,831	590,179	559,384
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	176,932	184,175	185,829
Export shipments	Quantity	257,057	325,425	374,634
Total shipments	Quantity	433,989	509,600	560,463
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	133,669	181,119	201,419
Export shipments	Value	175,107	314,592	406,974
Total shipments	Value	308,776	495,711	608,393

Table continued.

Table IV-25 Continued
CWP: Data on the industry in subject countries, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Capacity	Quantity	923,643	1,029,465	1,029,465	400,093	382,456
Production	Quantity	569,801	520,290	529,393	278,653	264,437
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	176,173	151,192	140,961	69,194	105,258
Export shipments	Quantity	381,276	355,883	372,111	199,642	158,181
Total shipments	Quantity	557,449	507,075	513,072	268,836	263,439
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	185,895	151,427	195,823	79,619	151,093
Export shipments	Value	374,267	306,550	557,869	269,265	261,171
Total shipments	Value	560,162	457,977	753,692	348,884	412,264

Table continued.

Table IV-25 Continued
CWP: Data on the industry in subject countries, by period

Unit values in dollars per short ton; shares in percent

Item	Measure	2016	2017	2018
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	755	983	1,084
Export shipments	Unit value	681	967	1,086
Total shipments	Unit value	711	973	1,086
Capacity utilization ratio	Ratio	64.5	70.7	63.0
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	40.8	36.1	33.2
Export shipments	Share	59.2	63.9	66.8
Total shipments	Share	100.0	100.0	100.0

Table continued.

Table IV-25 Continued
CWP: Data on the industry in subject countries, by period

Unit values in dollars per short ton; shares in percent

Item	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	1,055	1,002	1,389	1,151	1,435
Export shipments	Unit value	982	861	1,499	1,349	1,651
Total shipments	Unit value	1,005	903	1,469	1,298	1,565
Capacity utilization ratio	Ratio	61.7	50.5	51.4	69.6	69.1
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	31.6	29.8	27.5	25.7	40.0
Export shipments	Share	68.4	70.2	72.5	74.3	60.0
Total shipments	Share	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 IV-26**CWP: Producers' and resellers' in subject countries export shipments, by destination market and period**

Quantity in short tons; value in 1,000 dollars; unit values in dollars per short ton

Destination market	Measure	2016	2017	2018
United States	Quantity	74,372	136,824	120,295
European Union markets	Quantity	***	***	***
Asia markets	Quantity	***	***	***
All other markets	Quantity	103,803	108,480	170,258
Non-US destination markets	Quantity	182,685	188,601	254,339
All destination markets	Quantity	257,057	325,425	374,634
United States	Value	46,120	104,429	112,937
European Union markets	Value	***	***	***
Asia markets	Value	***	***	***
All other markets	Value	77,924	131,380	198,762
Non-US destination markets	Value	128,987	210,163	294,037
All destination markets	Value	175,107	314,592	406,974
United States	Unit value	620	763	939
European Union markets	Unit value	***	***	***
Asia markets	Unit value	***	***	***
All other markets	Unit value	751	1,211	1,167
Non-US destination markets	Unit value	706	1,114	1,156
All destination markets	Unit value	681	967	1,086

Table continued.

Table IV-26 Continued

CWP: Producers' and resellers' in subject countries export shipments, by destination market and period

Quantity in short tons; value in 1,000 dollars; unit values in dollars per short ton

Destination market	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
United States	Quantity	132,302	116,845	164,433	95,025	89,049
European Union markets	Quantity	***	***	***	***	***
Asia markets	Quantity	***	***	***	***	***
All other markets	Quantity	156,906	214,204	196,331	108,597	87,846
Non-US destination markets	Quantity	248,974	239,038	225,767	122,706	102,870
All destination markets	Quantity	381,276	355,883	390,200	217,731	191,919
United States	Value	118,784	95,015	213,986	114,398	127,940
European Union markets	Value	***	***	***	***	***
Asia markets	Value	***	***	***	***	***
All other markets	Value	170,422	191,179	334,592	164,079	160,634
Non-US destination markets	Value	255,483	211,535	366,442	177,426	180,641
All destination markets	Value	374,267	306,550	580,428	291,824	308,581
United States	Unit value	898	813	1,301	1,204	1,437
European Union markets	Unit value	***	***	***	***	***
Asia markets	Unit value	***	***	***	***	***
All other markets	Unit value	1,086	893	1,704	1,511	1,829
Non-US destination markets	Unit value	1,026	885	1,623	1,446	1,756
All destination markets	Unit value	982	861	1,488	1,340	1,608

Table continued.

Table IV-26 Continued

CWP: Producers' and resellers' in subject countries export shipments, by destination market and period

Shares and ratio in percent, ratios are based on quantity of total shipments

Destination market	Measure	2016	2017	2018
United States	Share of quantity	***	***	***
European Union markets	Share of quantity	***	***	***
Asia markets	Share of quantity	***	***	***
All other markets	Share of quantity	***	***	***
Non-US destination markets	Share of quantity	***	***	***
All destination markets	Share of quantity	***	***	***
United States	Share of value	***	***	***
European Union markets	Share of value	***	***	***
Asia markets	Share of value	***	***	***
All other markets	Share of value	***	***	***
Non-US destination markets	Share of value	***	***	***
All destination markets	Share of value	***	***	***
United States	Ratio	17.1	26.8	21.5
European Union markets	Ratio	***	***	***
Asia markets	Ratio	***	***	***
All other markets	Ratio	23.9	21.3	30.4
Non-US destination markets	Ratio	42.1	37.0	45.4
All destination markets	Ratio	59.2	63.9	66.8

Table continued.

Table IV-26 Continued

CWP: Producers' and resellers' in subject countries export shipments, by destination market and period

Shares and ratio in percent, ratios are based on quantity of total shipments

Destination market	Measure	2019	2020	2021	Jan-Jun 2021	Jan-Jun 2022
United States	Share of quantity	***	***	***	***	***
European Union markets	Share of quantity	***	***	***	***	***
Asia markets	Share of quantity	***	***	***	***	***
All other markets	Share of quantity	***	***	***	***	***
Non-US destination markets	Share of quantity	***	***	***	***	***
All destination markets	Share of quantity	***	***	***	***	***
United States	Share of value	***	***	***	***	***
European Union markets	Share of value	***	***	***	***	***
Asia markets	Share of value	***	***	***	***	***
All other markets	Share of value	***	***	***	***	***
Non-US destination markets	Share of value	***	***	***	***	***
All destination markets	Share of value	***	***	***	***	***
United States	Ratio	23.7	23.0	32.0	35.3	33.8
European Union markets	Ratio	***	***	***	***	***
Asia markets	Ratio	***	***	***	***	***
All other markets	Ratio	28.1	42.2	38.3	40.4	33.3
Non-US destination markets	Ratio	44.7	47.1	44.0	45.6	39.0
All destination markets	Ratio	68.4	70.2	76.1	81.0	72.9

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.

Third-country trade actions

CWP, including that from Oman and the UAE, has been subject to antidumping duty investigations and orders in Canada.¹⁷ Effective as of December 2012, CWP imported into Canada under HS subheadings 7306.30.00.10, 7306.30.00.20, and 7306.30.00.30 from multiple

¹⁷ Subject product defined as “Carbon steel welded pipe, commonly identified as standard pipe, in the nominal size range from 1/2 inch up to and including 6 inches (12.7 mm to 168.3 mm in outside diameter) inclusive, in various forms and finishes, usually supplied to meet ASTM A53, ASTM A135, ASTM A252, ASTM A589, ASTM A795, ASTM F1083 or Commercial Quality, or AWWA C200-97 or equivalent specifications, including water well casing, piling pipe, sprinkler pipe and fencing pipe, but excluding oil and gas line pipe made to API specifications exclusively...” [Carbon Steel Welded Pipe 2 \(CSWP 2\) - Measures in Force \(cbsa-asfc.gc.ca\)](https://www.cbsa-asfc.gc.ca/cswp-2/).

countries, including Oman and the UAE, was subject to antidumping duty orders.¹⁸ For imports of subject merchandise originating in/or exported from Oman and UAE for which the exporter had not been issued specific normal values, the antidumping duty is equal to 54.2 percent of the export price.¹⁹ These orders were continued on October 10, 2018.

On February 15, 2019, Canada implemented antidumping duty orders on CWP imported under HS subheadings 7306.30.00.10, 7306.30.00.20, and 7306.30.00.30 from Pakistan, Philippines, Turkey, and Vietnam.²⁰ For imports of subject merchandise, the antidumping duties were 66.8 percent for Pakistan and the Philippines; 45.8 percent for Turkey; and 54.2 percent for Vietnam.²¹

Global market

Table IV-27 presents global export data for welded tubes, pipes, and hollow profiles of iron or nonalloy steel, a category that includes CWP and out-of-scope products, by source, in 2021. China, Italy, and Turkey accounted for 16.9 percent, 14.4 percent, and 10.6 percent of total exports in 2021, respectively. Global exports increased by 11.7 percent, by quantity, from 2020 to 2021.

¹⁸ Carbon Steel Welded Pipe, Inquiry No. NQ-2012-003 (Dec. 2012), Canada International Trade Tribunal, available at <https://decisions.citt-tcce.gc.ca/citt-tcce/a/en/item/353558/index.do>.

¹⁹ Certain Carbon Steel Welded Pipe 2 (CSWP 2) Dumping (Chinese Taipei, India, Oman, South Korea, Thailand and United Arab Emirates) & subsidizing (India) <https://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev/cswp2-eng.html?wbdisable=true>; Canada, "Semi-Annual Report Under Article 16.4 of the Agreement," WTO, G/ADP/N/357/CAN, October 15, 2021, p. 25, <https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/G/ADP/N357CAN.pdf&Open=True>.

²⁰ Subject product defined as "Carbon steel welded pipe, commonly identified as standard pipe, in the nominal size range from ½ inch up to and including 6 inches (12.7 mm to 168.3 mm in outside diameter) inclusive, in various forms and finishes, usually supplied to meet ASTM A53, ASTM A135, ASTM A252, ASTM A589, ASTM A795, ASTM F1083 or Commercial Quality, or AWWA C200-97 or equivalent specifications, including water well casing, piling pipe, sprinkler pipe and fencing pipe, but excluding oil and gas line pipe made to API specifications exclusively..." <https://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev/cswp3-eng.html>.

²¹ Carbon Steel Welded Pipe 3 (CSWP 3) Dumping (Pakistan, Philippines, Turkey, Vietnam), [Carbon steel welded pipe 3 \(CSWP 3\) - Measures in Force \(cbsa-asfc.gc.ca\)](https://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev/cswp3-eng.html); Canada, "Semi-Annual Report Under Article 16.4 of the Agreement," WTO, G/ADP/N/357/CAN, October 15, 2021, p. 26, <https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/G/ADP/N357CAN.pdf&Open=True>.

Table IV-27**Welded tubes, pipes, and hollow profiles of iron or nonalloy steel: Global exports, by reporting country and by period**

Quantity in short tons; value in 1,000 dollars

Exporting country	Measure	2016	2017	2018	2019	2020	2021
United States	Quantity	300,055	305,786	299,741	224,348	213,851	248,512
Oman	Quantity	30,641	53,146	55,274	57,775	39,304	98,052
Pakistan	Quantity	53,211	46,150	41,982	23,001	20,970	27,298
UAE	Quantity	106,445	169,598	148,108	182,457	184,410	212,221
Subject sources	Quantity	190,296	268,894	245,364	263,233	244,684	337,571
China	Quantity	1,430,952	1,267,901	1,177,350	1,143,846	1,106,263	1,217,931
Italy	Quantity	1,115,332	1,173,318	1,168,062	1,168,073	1,015,213	1,040,933
Turkey	Quantity	541,876	675,959	690,485	618,489	623,295	764,265
India	Quantity	209,268	236,727	285,110	360,364	222,674	366,523
Germany	Quantity	354,873	370,395	365,253	344,281	280,423	299,946
Russia	Quantity	194,905	221,366	244,913	273,059	324,306	284,943
Spain	Quantity	230,426	249,018	249,660	261,993	251,972	280,248
South Korea	Quantity	449,754	440,297	393,132	333,705	300,963	279,274
Poland	Quantity	144,205	157,522	172,702	183,279	162,483	200,791
Canada	Quantity	260,196	254,414	230,851	184,190	169,252	192,428
Thailand	Quantity	114,414	162,516	132,494	35,322	121,629	171,084
All other exporters	Quantity	1,660,410	1,800,917	1,826,471	1,665,237	1,430,787	1,541,367
All reporting exporters	Quantity	7,196,960	7,585,031	7,481,585	7,059,420	6,467,794	7,225,817
United States	Value	459,679	482,258	525,846	435,715	357,307	606,480
Oman	Value	15,202	32,464	37,533	37,345	22,114	88,102
Pakistan	Value	31,981	32,080	30,618	15,980	13,036	23,914
UAE	Value	61,959	118,079	118,369	133,151	121,063	191,945
Subject sources	Value	109,141	182,623	186,520	186,475	156,214	303,961
China	Value	879,827	948,202	1,016,855	952,338	928,808	1,682,037
Italy	Value	860,345	1,055,279	1,180,867	1,100,769	907,779	1,433,883
Turkey	Value	316,046	479,150	542,026	427,927	402,019	738,599
India	Value	130,068	183,335	259,803	282,095	208,261	399,856
Germany	Value	445,745	528,466	583,966	527,527	419,350	542,820
Russia	Value	97,967	134,691	151,940	157,451	170,438	241,238
Spain	Value	216,609	267,255	297,535	283,192	260,905	429,004
South Korea	Value	356,702	361,906	367,080	301,454	253,626	322,135
Poland	Value	105,288	134,001	163,299	157,906	134,577	247,792
Canada	Value	282,182	297,684	277,477	204,732	173,833	338,632
Thailand	Value	78,129	127,765	113,077	46,754	100,579	169,107
All other exporters	Value	1,666,202	1,910,621	2,190,510	1,889,561	1,616,067	2,339,541
All reporting exporters	Value	6,003,928	7,093,236	7,856,802	6,953,898	6,089,763	9,795,087

Table continued.

Table IV-27 Continued**Welded tubes, pipes, and hollow profiles of iron or nonalloy steel: Global exports, by reporting country and by period**

Unit values in dollars per short ton

Exporting country	Measure	2016	2017	2018	2019	2020	2021
United States	Unit value	1,532	1,577	1,754	1,942	1,671	2,440
Oman	Unit value	496	611	679	646	563	899
Pakistan	Unit value	601	695	729	695	622	876
UAE	Unit value	582	696	799	730	656	904
Subject sources	Unit value	574	679	760	708	638	900
China	Unit value	615	748	864	833	840	1,381
Italy	Unit value	771	899	1,011	942	894	1,377
Turkey	Unit value	583	709	785	692	645	966
India	Unit value	622	774	911	783	935	1,091
Germany	Unit value	1,256	1,427	1,599	1,532	1,495	1,810
Russia	Unit value	503	608	620	577	526	847
Spain	Unit value	940	1,073	1,192	1,081	1,035	1,531
South Korea	Unit value	793	822	934	903	843	1,153
Poland	Unit value	730	851	946	862	828	1,234
Canada	Unit value	1,085	1,170	1,202	1,112	1,027	1,760
Thailand	Unit value	683	786	853	1,324	827	988
All other exporters	Unit value	1,003	1,061	1,199	1,135	1,129	1,518
All reporting exporters	Unit value	834	935	1,050	985	942	1,356

Table continued.

Table IV-27 Continued**Welded tubes, pipes, and hollow profiles of iron or nonalloy steel: Global exports, by reporting country and by period**

Shares in percent

Exporting country	Measure	2016	2017	2018	2019	2020	2021
United States	Share of quantity	4.2	4.0	4.0	3.2	3.3	3.4
Oman	Share of quantity	0.4	0.7	0.7	0.8	0.6	1.4
Pakistan	Share of quantity	0.7	0.6	0.6	0.3	0.3	0.4
UAE	Share of quantity	1.5	2.2	2.0	2.6	2.9	2.9
Subject sources	Share of quantity	2.6	3.5	3.3	3.7	3.8	4.7
China	Share of quantity	19.9	16.7	15.7	16.2	17.1	16.9
Italy	Share of quantity	15.5	15.5	15.6	16.5	15.7	14.4
Turkey	Share of quantity	7.5	8.9	9.2	8.8	9.6	10.6
India	Share of quantity	2.9	3.1	3.8	5.1	3.4	5.1
Germany	Share of quantity	4.9	4.9	4.9	4.9	4.3	4.2
Russia	Share of quantity	2.7	2.9	3.3	3.9	5.0	3.9
Spain	Share of quantity	3.2	3.3	3.3	3.7	3.9	3.9
South Korea	Share of quantity	6.2	5.8	5.3	4.7	4.7	3.9
Poland	Share of quantity	2.0	2.1	2.3	2.6	2.5	2.8
Canada	Share of quantity	3.6	3.4	3.1	2.6	2.6	2.7
Thailand	Share of quantity	1.6	2.1	1.8	0.5	1.9	2.4
All other exporters	Share of quantity	23.1	23.7	24.4	23.6	22.1	21.3
All reporting exporters	Share of quantity	100.0	100.0	100.0	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7306.30 reported by various national statistical authorities in the Global Trade Atlas database, accessed August 18, 2022 and official global imports statistics from Oman, Pakistan, and the UAE under HS subheading 7306.30 as reported by UN Comtrade in the Global Trade Atlas database, accessed September 7, 2022.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top followed by the countries under investigation, all remaining top exporting countries in descending order of 2021 data.

Prices

As shown in table IV-28 and figure IV-8, U.S. prices for electric resistance welded (ERW) pipe published by a private market research firm were relatively stable from early 2019 through early 2021 and then increased considerably thereafter. The increases in 2021 are partially reflective of rising steel prices during that time period. Prices have fluctuated since the end of 2021 through July 2022.

Table IV-28
ERW pipe: Prices, by grade and month, January 2016 through July 2022

Unit values in dollars per short ton

Period	Grade A	Grade B
Jan-16	***	***
Feb-16	***	***
Mar-16	***	***
Apr-16	***	***
May-16	***	***
Jun-16	***	***
Jul-16	***	***
Aug-16	***	***
Sep-16	***	***
Oct-16	***	***
Nov-16	***	***
Dec-16	***	***
Jan-17	***	***
Feb-17	***	***
Mar-17	***	***
Apr-17	***	***
May-17	***	***
Jun-17	***	***
Jul-17	***	***
Aug-17	***	***
Sep-17	***	***
Oct-17	***	***
Nov-17	***	***
Dec-17	***	***
Jan-18	***	***
Feb-18	***	***
Mar-18	***	***
Apr-18	***	***
May-18	***	***
Jun-18	***	***
Jul-18	***	***
Aug-18	***	***
Sep-18	***	***
Oct-18	***	***
Nov-18	***	***
Dec-18	***	***

Table continued.

Table IV-28 Continued
ERW pipe: Prices, by grade and month, January 2016 through July 2022

Unit values in dollars per short ton

Period	Grade A	Grade B
Jan-19	***	***
Feb-19	***	***
Mar-19	***	***
Apr-19	***	***
May-19	***	***
Jun-19	***	***
Jul-19	***	***
Aug-19	***	***
Sep-19	***	***
Oct-19	***	***
Nov-19	***	***
Dec-19	***	***
Jan-20	***	***
Feb-20	***	***
Mar-20	***	***
Apr-20	***	***
May-20	***	***
Jun-20	***	***
Jul-20	***	***
Aug-20	***	***
Sep-20	***	***
Oct-20	***	***
Nov-20	***	***
Dec-20	***	***
Jan-21	***	***
Feb-21	***	***
Mar-21	***	***
Apr-21	***	***
May-21	***	***
Jun-21	***	***
Jul-21	***	***
Aug-21	***	***
Sep-21	***	***
Oct-21	***	***
Nov-21	***	***
Dec-21	***	***
Jan-22	***	***
Feb-22	***	***
Mar-22	***	***
Apr-22	***	***
May-22	***	***
Jun-22	***	***
Jul-22	***	***

Source: ***

Figure IV-8
ERW pipe: Prices, by grade and month, January 2016 through July 2022

* * * * *

Source: ***.

Table IV-29 shows monthly prices for hot-rolled coil steel from selected markets from January 2016 to July 2022.

Table IV-29
Hot-rolled coil steel prices, selected countries, January 2016 through July 2022

Unit values in dollars per short ton

Period	United States	China	Brazil	CIS	Turkey	Northern Europe	India
Jan 2016	***	***	***	***	***	***	***
Feb 2016	***	***	***	***	***	***	***
Mar 2016	***	***	***	***	***	***	***
Apr 2016	***	***	***	***	***	***	***
May 2016	***	***	***	***	***	***	***
Jun 2016	***	***	***	***	***	***	***
Jul 2016	***	***	***	***	***	***	***
Aug 2016	***	***	***	***	***	***	***
Sep 2016	***	***	***	***	***	***	***
Oct 2016	***	***	***	***	***	***	***
Nov 2016	***	***	***	***	***	***	***
Dec 2016	***	***	***	***	***	***	***
Jan 2017	***	***	***	***	***	***	***
Feb 2017	***	***	***	***	***	***	***
Mar 2017	***	***	***	***	***	***	***
Apr 2017	***	***	***	***	***	***	***
May 2017	***	***	***	***	***	***	***
Jun 2017	***	***	***	***	***	***	***
Jul 2017	***	***	***	***	***	***	***
Aug 2017	***	***	***	***	***	***	***
Sep 2017	***	***	***	***	***	***	***
Oct 2017	***	***	***	***	***	***	***
Nov 2017	***	***	***	***	***	***	***
Dec 2017	***	***	***	***	***	***	***
Jan 2018	***	***	***	***	***	***	***
Feb 2018	***	***	***	***	***	***	***
Mar 2018	***	***	***	***	***	***	***
Apr 2018	***	***	***	***	***	***	***
May 2018	***	***	***	***	***	***	***
Jun 2018	***	***	***	***	***	***	***
Jul 2018	***	***	***	***	***	***	***
Aug 2018	***	***	***	***	***	***	***
Sep 2018	***	***	***	***	***	***	***
Oct 2018	***	***	***	***	***	***	***
Nov 2018	***	***	***	***	***	***	***
Dec 2018	***	***	***	***	***	***	***

Table continued.

Table IV-29 Continued
Hot-rolled coil steel prices, selected countries, January 2016 through July 2022

Unit values in dollars per short ton

Period	United States	China	Brazil	CIS	Turkey	Northern Europe	India
Jan 2019	***	***	***	***	***	***	***
Feb 2019	***	***	***	***	***	***	***
Mar 2019	***	***	***	***	***	***	***
Apr 2019	***	***	***	***	***	***	***
May 2019	***	***	***	***	***	***	***
Jun 2019	***	***	***	***	***	***	***
Jul 2019	***	***	***	***	***	***	***
Aug 2019	***	***	***	***	***	***	***
Sep 2019	***	***	***	***	***	***	***
Oct 2019	***	***	***	***	***	***	***
Nov 2019	***	***	***	***	***	***	***
Dec 2019	***	***	***	***	***	***	***
Jan 2020	***	***	***	***	***	***	***
Feb 2020	***	***	***	***	***	***	***
Mar 2020	***	***	***	***	***	***	***
Apr 2020	***	***	***	***	***	***	***
May 2020	***	***	***	***	***	***	***
Jun 2020	***	***	***	***	***	***	***
Jul 2020	***	***	***	***	***	***	***
Aug 2020	***	***	***	***	***	***	***
Sep 2020	***	***	***	***	***	***	***
Oct 2020	***	***	***	***	***	***	***
Nov 2020	***	***	***	***	***	***	***
Dec 2020	***	***	***	***	***	***	***
Jan 2021	***	***	***	***	***	***	***
Feb 2021	***	***	***	***	***	***	***
Mar 2021	***	***	***	***	***	***	***
Apr 2021	***	***	***	***	***	***	***
May 2021	***	***	***	***	***	***	***
Jun 2021	***	***	***	***	***	***	***
Jul 2021	***	***	***	***	***	***	***
Aug 2021	***	***	***	***	***	***	***
Sep 2021	***	***	***	***	***	***	***
Oct 2021	***	***	***	***	***	***	***
Nov 2021	***	***	***	***	***	***	***
Dec 2021	***	***	***	***	***	***	***

Table continued.

Table IV-29 Continued
Hot-rolled coil steel prices, selected countries, January 2016 through July 2022

Unit values in dollars per short ton

Period	United States	China	Brazil	CIS	Turkey	Northern Europe	India
Jan 2022	***	***	***	***	***	***	***
Feb 2022	***	***	***	***	***	***	***
Mar 2022	***	***	***	***	***	***	***
Apr 2022	***	***	***	***	***	***	***
May 2022	***	***	***	***	***	***	***
Jun 2022	***	***	***	***	***	***	***
Jul 2022	***	***	***	***	***	***	***

Source: ***.

Note: ***.

Figure IV-9
Hot-rolled coil steel prices, selected countries, January 2016 through July 2022

* * * * *

Source: ***

Part V: Pricing data

Factors affecting prices

Raw material costs

Raw materials constitute a substantial portion of the final cost of CWP. U.S. producers' raw material costs accounted for at least three-quarters of the total cost of goods sold (COGS) from January 2016 to June 2022. As a share of total COGS, they fluctuated over the period, ending at roughly the same level in 2021 as in 2016, and 3.8 percentage points higher in January-June 2022 compared to 2021. The primary raw material input used in the production of CWP is hot-rolled steel. Hot-rolled steel accounted for nearly 90 percent of U.S. producers' total raw material costs in 2021. Zinc is also used in some applications, such as galvanizing.

As shown in figure V-1, the prices of hot-rolled coil and zinc both increased between January 2016 and June 2022. Most of that increase occurred between August 2020 and September 2021 for hot-rolled coil (which increased in price by 312 percent during this time) and between April 2020 and April 2022 for zinc (which increased by 129 percent during this time). Prices decreased for both hot-rolled coil and zinc after their peaks in September 2021 and April 2022, respectively, but were higher in June 2022 compared to January 2016 by 180.4 percent and 138.7 percent, respectively. Between June and September 2022, prices for hot-rolled coil and zinc both decreased by 27.6 percent and 13.8 percent, respectively.

Petitioners argue that a combination of pent-up demand and supply chain problems led to the increase in hot-rolled coil prices, and that the Russia-Ukraine war, high inflation, and rising interest rates are likely to weaken demand outlook for the foreseeable future.¹

¹ Domestic producers' posthearing brief, Answers to Commission Questions In Lieu of Hearing, p. 5.

Figure V-1

Raw material prices: Hot-rolled coil index (U.S. domestic fob mill) and Zinc (LME cash price for SHG), dollars per metric ton, monthly, January 2016–September 2022

* * * * *

U.S. producers, importers, and foreign producers were asked how raw material prices for CWP changed since January 1, 2016, as well as how they anticipate the prices will change in the future. As shown in table V-1, firms either reported fluctuating or increasing raw material prices since January 1, 2016. Firms generally indicated that the increase in hot-rolled coil prices contributed to the rise in CWP prices. A few firms also pointed to the section 232 measures on steel and COVID-related challenges as a driver of the price increases and/or fluctuations. One importer also reported that several factors created raw material price fluctuations, including China’s effect on the hot-rolled coil market, domestic producers’ pricing, global recession expectations, inflation conditions, demand shortages, and the war between Russia and Ukraine.

Most U.S. producers and importers reported that they expect prices to fluctuate in the future, with some expecting no change and some expecting prices to continue to increase. Foreign producers reported that they expect prices to either decrease (3 of 5 firms) or fluctuate (2 of 5 firms).

Table V-1**CWP: Count of firms' responses regarding changes in raw material prices since January 1, 2016, by firm type**

Number of firms reporting

Firm type	Increase	No change	Decrease	Fluctuate
U.S. producers	2	0	0	4
Importers	5	0	0	8
Foreign producers	3	0	0	3

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

Table V-2**CWP: Count of firms' responses regarding anticipated changes in raw material prices in the future, by firm type**

Number of firms reporting

Firm type	Increase	No change	Decrease	Fluctuate
U.S. producers	1	1	0	4
Importers	2	2	0	7
Foreign producers	0	0	3	2

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

In addition, purchasers were asked whether they were familiar with the prices for raw materials used in the production of CWP, as well as whether information on raw material prices affected their negotiations or contracts to purchase CWP. Most purchasers (19 of 30 firms) reported that they were familiar with raw material prices, while most (18 of 27 firms) reported that the information on raw material did not affect their negotiations or contracts.

Transportation costs to the U.S. market

Transportation costs for CWP shipped from subject countries to the United States averaged 7.1 percent for Oman, 1.8 percent for Pakistan, and 11.1 percent for the UAE during 2021, for a combined average of 9.7 percent. These estimates were derived from official import data and represent the transportation and other charges on imports.²

² 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. Source: Official U.S. import statistics of the U.S. Department of Commerce Census Bureau, using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090, accessed August 31, 2022.

U.S. inland transportation costs

Most responding U.S. producers (6 of 7 firms) and half of importers (6 of 12 firms) reported that they typically arrange transportation to their customers. U.S. producers reported U.S. inland transportation costs ranging from 5.4 to 10.0 percent (for an average of 7.4 percent), while most responding importers reported costs of 2 to 8 percent (for an average of 4.3 percent).

Pricing practices

Pricing methods

U.S. producers and importers reported setting prices using transaction-by-transaction negotiations and contracts, primarily, while 4 of 7 responding U.S. producers also reported using set price lists and only 1 of 12 responding importers did (table V-3).

Table V-3
CWP: Count of U.S. producers' and importers' reported price setting methods

Number of firms reporting

Method	U.S. producers	Importers
Transaction-by-transaction	6	9
Contract	5	7
Set price list	4	1
Other	0	0
Responding firms	7	13

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

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

U.S. producers and importers reported selling a large majority of their CWP in the spot market. U.S. producers and importers also reported selling CWP through short-term contracts, ***. Neither U.S. producers nor importers reported selling CWP through long-term contracts (table V-4).

Table V-4
CWP: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2021

Shares in percent

Type of sale	U.S. producers	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.

Eight purchasers reported that they purchase product daily, 13 purchase weekly, 4 purchase monthly, 2 purchase quarterly, and none purchase annually. Four purchasers reported purchasing with some other level of frequency, with two indicating that they purchase “as needed” and one stating that its purchases depend on offers from its supplier(s). Nearly all responding purchasers (27 of 28 firms) reported that they did not expect their purchasing patterns to change in the next two years, while one indicated that its purchasing patterns may change “if supply chain issues improve and prices stabilize.” Most purchasers (19 of 30) contact up to 3 suppliers before making a purchase, although four contact no more than 2 suppliers, three contact up to 4, one contacts up to 5, two contact up to 6, and one (***) contacts up to 10 suppliers before making a purchase. Most purchasers (23 of 30 firms) reported that their purchases usually involve negotiations with the supplier. The reported factors discussed during these negotiations include price, availability, lead time, delivery, payment terms, volume, product origin, quality, and adjustment frequency. When it comes to quoting competitors’ pricing, most of the responding purchasers (3 of 5 firms) reported that they do not, while the other two do.

Sales terms and discounts

U.S. producers reported quoting prices on both an f.o.b. basis (4 of 7 firms) and delivered basis (3 of 7 firms). Importers were more likely to quote prices on a delivered basis (as indicated by 6 of 8 firms) than an f.o.b. basis (3 of 8 firms).³ U.S. producers reported offering discounts on total volume (5 firms), quantity (4 firms), and timely payments (1 firm). Three U.S. producers reported having no discount policy. Most importers reported having no discount policy (7 firms), while two firms each reported offering total volume and quantity discounts.

³ One importer reported quoting prices on both an f.o.b. and delivered basis.

One importer also reported offering discounts of 0.5-1 percent for payment within 10 days, and one reported offering occasional discounts for early payment of net 10 at 0.5 percent.

Price leadership

Several purchasers reported price leaders in the CWP market. The cited firms included Atlas and Wheatland (named by 5 firms each), Nucor (named by 4 firms), and Bull Moose, Cleveland Cliffs, Puerto Rico Steel Products, Texas Pipe, Tubex, and Vass Pipe (named by 1 firm each). Purchasers reporting the presence of price leaders indicated that these price leaders typically led by being the first to announce price changes.

Price data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following CWP products shipped to unrelated U.S. customers during January 2016-June 2022.

Product 1.--ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 2–4 inches inclusive

Product 2.--ASTM A53 schedule 40 galvanized plain-end, with nominal outside diameter of 2–4 inches inclusive

Product 3.--ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 6–8 inches inclusive

Product 4.--ASTM A53 and/or F1083 schedule 40 galvanized fence tube, with nominal outside diameter of 1-1/4–3 inches, inclusive

Firms were requested to report these four pricing products separately by grade, specifically grade A and grade B.⁴ Five U.S. producers and six importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products

⁴ Grades A and B refer to the chemical composition of the steel that is used to produce the pipe as well as its mechanical properties, and is typically determined by the ASTM specifications, though both grades may also meet non-ASTM specifications. Grade B ASTM A53 CWP typically has a higher tensile and yield strength than grade A ASTM A53 CWP. The Universal Respondents also argue that grade B is typically higher quality and more expensive. See Universal Respondents' comments on draft questionnaires, p. 2; Domestic producers' posthearing brief, Answers to Commission Questions In Lieu of Hearing, p. 1.

for all quarters.⁵ ⁶ Pricing data reported by these firms accounted for approximately 12.3 percent of U.S. producers' reported U.S. commercial shipments of CWP, 0.0 percent of reported U.S. commercial shipments of subject imports from Oman in 2021,⁷ and 70.6 percent of reported U.S. commercial shipments of subject imports from the UAE in 2021.⁸ No importer provided price data for subject imports from Pakistan.

Aggregated price data for products 1-4, with grade A and grade B combined, are presented in tables V-5 to V-8 and figures V-2 to V-5. Disaggregated price data for grade A and grade B are presented separately in appendix H.

⁵ 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.

⁶ Some firms provided data for quarterly quantities of as little as one or two short tons. Since the questionnaire issued by the Commission is programmed to round to the nearest integer, reported quarterly quantities of 1-2 short tons can lead to distorted and non-representative average unit values. See EDIS document no. 779516. For this reason, all reported quantities of two short tons or less have been removed from the pricing data.

⁷ The reported pricing data for Oman accounted for approximately 0.5 percent of reported U.S. commercial shipments of subject imports from Oman during the entire period for which data were collected, January 2016-June 2022.

⁸ Pricing coverage is based on U.S. shipments reported in questionnaires.

Table V-5

CWP: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 (grades A and B, combined) and margins of underselling/(overselling), by source and quarter

Quantity in short tons; prices in dollars per short ton; margins in percent

Period	U.S. price	U.S. quantity	Oman price	Oman quantity	Oman margin	UAE price	UAE quantity	UAE margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
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: ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 2–4 inches inclusive.

Table V-6

CWP: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 (grades A and B, combined) and margins of underselling/(overselling), by source and quarter

Quantity in short tons; prices in dollars per short ton; margins in percent

Period	U.S. price	U.S. quantity	Oman price	Oman quantity	Oman margin	UAE price	UAE quantity	UAE margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
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: ASTM A53 schedule 40 galvanized plain-end, with nominal outside diameter of 2–4 inches inclusive.

Table V-7

CWP: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 (grades A and B, combined) and margins of underselling/(overselling), by source and quarter

Quantity in short tons; prices in dollars per short ton; margins in percent

Period	U.S. price	U.S. quantity	Oman price	Oman quantity	Oman margin	UAE price	UAE quantity	UAE margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
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: ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 6–8 inches inclusive.

Table V-8

CWP: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 (grades A and B, combined) and margins of underselling/(overselling), by source and quarter

Quantity in short tons; prices in dollars per short ton; margins in percent

Period	U.S. price	U.S. quantity	Oman price	Oman quantity	Oman margin	UAE price	UAE quantity	UAE margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
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 4: ASTM A53 and/or F1083 schedule 40 galvanized fence tube, with nominal outside diameter of 1-1/4–3 inches, inclusive.

Figure V-2

CWP: Weighted-average prices and quantities of domestic and imported product 1 (grades A and B, combined), by source and quarter

Price of product 1

* * * * *

Volume of product 1

* * * * *

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

Note: Product 1: ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 2–4 inches inclusive.

Figure V-3

CWP: Weighted-average prices and quantities of domestic and imported product 2 (grades A and B, combined), by source and quarter

Price of product 2

* * * * *

Volume of product 2

* * * * *

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

Note: Product 2: ASTM A53 schedule 40 galvanized plain-end, with nominal outside diameter of 2–4 inches inclusive.

Figure V-4

CWP: Weighted-average prices and quantities of domestic and imported product 3 (grades A and B, combined), by source and quarter

Price of product 3

* * * * *

Volume of product 3

* * * * *

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

Note: Product 3: ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 6–8 inches inclusive.

Figure V-5

CWP: Weighted-average prices and quantities of domestic and imported product 4 (grades A and B, combined), by source and quarter

Price of product 4

* * * * *

Volume of product 4

* * * * *

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

Note: Product 4: ASTM A53 and/or F1083 schedule 40 galvanized fence tube, with nominal outside diameter of 1-1/4–3 inches, inclusive.

Price trends

In general, prices increased during January 2016-June 2022. Table V-9 summarizes the price trends, by country and by product. As shown in the table, domestic price increases ranged from *** percent (for product ***) to *** percent (for product ***) between the first quarter of 2016 and the second quarter of 2022. Price increases for imports from the UAE ranged from *** percent (for product ***) to *** percent (for product ***) during this time.

Table V-9
CWP: Summary of price data, by product and source, first quarter of 2016-second quarter of 2022

Quantity in short tons; Price in dollars per short ton; Changes in percent

Product	Source	Number of quarters	Quantity	Low price	High price	First quarter price	Last quarter price	Percent change in price over period
Product 1	United States	***	***	***	***	***	***	***
Product 1	Oman	***	***	***	***	***	***	***
Product 1	Pakistan	***	***	***	***	***	***	***
Product 1	UAE	***	***	***	***	***	***	***
Product 2	United States	***	***	***	***	***	***	***
Product 2	Oman	***	***	***	***	***	***	***
Product 2	Pakistan	***	***	***	***	***	***	***
Product 2	UAE	***	***	***	***	***	***	***
Product 3	United States	***	***	***	***	***	***	***
Product 3	Oman	***	***	***	***	***	***	***
Product 3	Pakistan	***	***	***	***	***	***	***
Product 3	UAE	***	***	***	***	***	***	***
Product 4	United States	***	***	***	***	***	***	***
Product 4	Oman	***	***	***	***	***	***	***
Product 4	Pakistan	***	***	***	***	***	***	***
Product 4	UAE	***	***	***	***	***	***	***

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

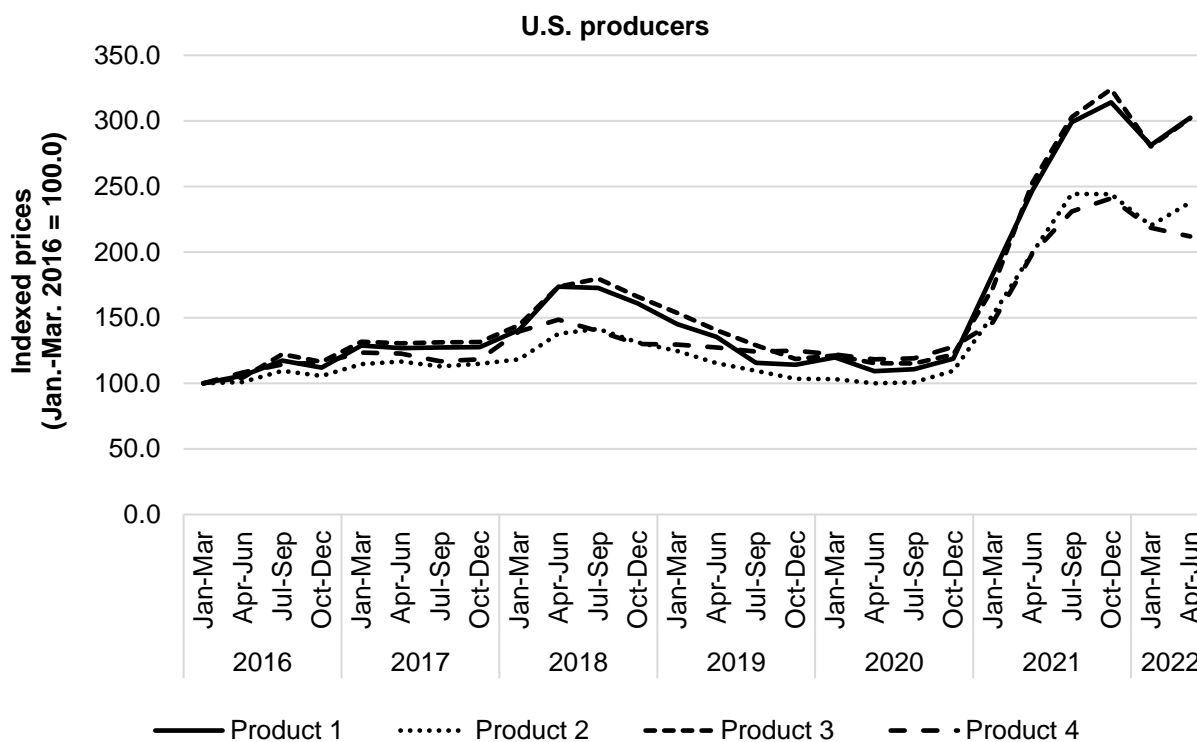
Note: The percent change column is the percentage change from the first quarter of 2016 to the second quarter of 2022.

Purchasers were also asked if there had been a change in the price of CWP from various sources since January 1, 2016, as well as how the prices of CWP from the United States had changed relative to the prices of CWP from Oman, Pakistan, and the UAE since January 1, 2016. Almost all purchasers reported that there had been a change in prices from the United States (reported by 27 of 29 firms), Oman (all 10 firms), Pakistan (all 5 firms), and the UAE (11 of 12

firms). A plurality of purchasers reported that domestic CWP was now relatively higher in price than CWP from Oman and the UAE, though most of the remaining firms reported that the prices had changed by the same amount. On a country specific basis, six purchasers reported that U.S.-produced CWP was now relatively higher in price than Omani CWP, five reported that the prices had changed by the same amount, and one reported that U.S.-produced CWP was now relatively lower in price than Omani CWP. Two purchasers reported that U.S.-produced CWP was now relatively higher in price than Pakistani CWP, three reported that the prices had changed by the same amount, and none reported that U.S.-produced CWP was now relatively lower in price than Pakistani CWP. Finally, seven purchasers reported that U.S.-produced CWP was now relatively higher in price than Emirati CWP, five reported that the prices had changed by the same amount, and one reported that U.S.-produced CWP was now relatively lower in price than Emirati CWP.

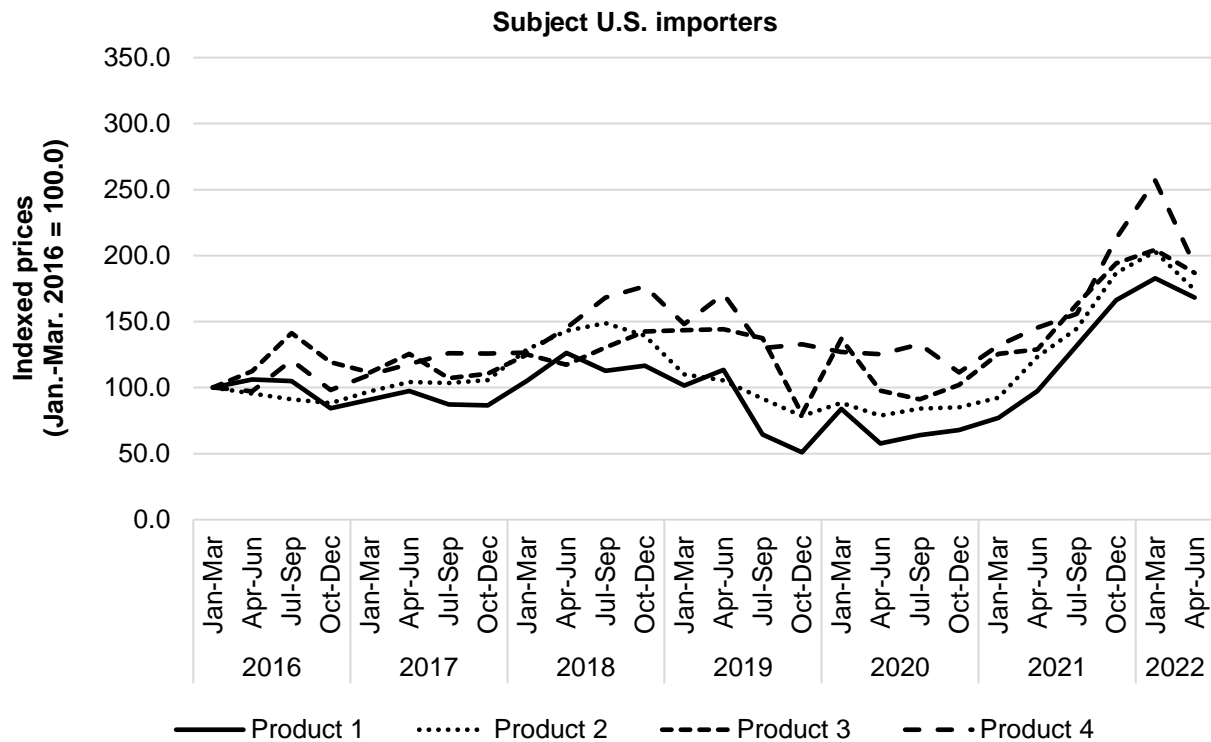
As shown in figures V-6 and V-7, price increases of products 1-4 from the United States and from the subject countries followed similar patterns, though subject import prices showed slightly more variation among the pricing products and a less pronounced increase at the end of the period.

Figure V-6
CWP: Indexed price changes of products 1-4 (grades A and B combined) from the United States, first quarter of 2016-second quarter of 2022



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

Figure V-7
CWP: Indexed price changes of products 1-4 (grades A and B combined) from subject import sources, first quarter of 2016-second quarter of 2022



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

Price comparisons⁹

As shown in table V-10, subject imports mostly undersold domestic CWP for products 1 and 3 and entirely undersold domestic CWP for products 2 and 4. The largest average margin of underselling was on product 4 and the largest average margin on overselling was on product 1.

As shown in table V-11, prices for CWP imported from Oman were below those for U.S.-produced product in *** instances; margins of underselling ranged from *** to ***

⁹ In the original investigations, subject imports from Oman were priced lower than domestic product in 38 of 45 comparisons, with underselling margins ranging from *** to *** percent; subject imports from Pakistan were priced lower than domestic product in 22 of 33 comparisons, with underselling margins ranging from *** to *** percent; and subject imports from the UAE were priced lower than domestic product in 41 of 66 comparisons, with underselling margins ranging from *** to *** percent. Investigation Nos. 731-TA-549 and 701-TA-1299, 1300, 1302, and 1303 (Final): Circular Welded Carbon-Quality Steel Pipe from Oman, Pakistan, the United Arab Emirates, and Vietnam, Confidential Report, INV-OO-102, November 7, 2016 (“Original confidential report”), p. V-28; Original publication, p. V-12.

percent. Prices for CWP imported from the UAE were below those for U.S.-produced product in 97 of 104 instances; margins of underselling ranged from *** to *** percent. In the remaining 7 instances, prices for CWP from the UAE were between *** and *** percent above prices for the domestic product. No firm provided pricing data for CWP from Pakistan.

Table V-10
CWP: Instances of underselling and overselling and the range and average of margins, by product

Quantity in short tons; Margins in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	25	***	***	***	***
Product 2	Underselling	27	***	***	***	***
Product 3	Underselling	22	***	***	***	***
Product 4	Underselling	26	***	***	***	***
Total, all products	Underselling	100	308,958	38.2	0.9	66.6
Product 1	Overselling	2	***	***	***	***
Product 2	Overselling	0	***	***	***	***
Product 3	Overselling	5	***	***	***	***
Product 4	Overselling	0	***	***	***	***
Total, all products	Overselling	7	763	(9.5)	(2.5)	(27.9)

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-11
CWP: Instances of underselling and overselling and the range and average of margins, by source

Quantity in short tons; Margins in percent

Source	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Oman	Underselling	***	***	***	***	***
Pakistan	Underselling	***	***	***	***	***
UAE	Underselling	***	***	***	***	***
Total, all subject sources	Underselling	100	308,958	38.2	0.9	66.6
Oman	Overselling	***	***	***	***	***
Pakistan	Overselling	***	***	***	***	***
UAE	Overselling	***	***	***	***	***
Total, all subject sources	Overselling	7	763	(9.5)	(2.5)	(27.9)

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.

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
86 FR 60201 November 1, 2021	<i>Initiation of Five-Year (Sunset) Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2021-11-01/pdf/2021-23744.pdf
86 FR 60289 November 1, 2021	<i>Circular Welded Carbon-Quality Steel Pipe From Oman, Pakistan, and the United Arab Emirates; Institution of Five-Year Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2021-11-01/pdf/2021-23681.pdf
87 FR 9315 February 18, 2022	<i>Circular Welded Carbon-Quality Steel Pipe From Oman, Pakistan, and the United Arab Emirates: Final Results of Expedited Sunset Reviews of Antidumping Duty Orders</i>	https://www.govinfo.gov/content/pkg/FR-2022-02-18/pdf/2022-03532.pdf
87 FR 9641 February 22, 2022	<i>Circular Welded Carbon-Quality Steel Pipe From Oman, Pakistan, and the United Arab Emirates; Notice of Commission Determination to Conduct Full Five-Year Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2022-02-22/pdf/2022-03685.pdf
87 FR 36881 June 21, 2022	<i>Circular Welded Carbon-Quality Steel Pipe From Oman, Pakistan, and the United Arab Emirates; Scheduling of a Full Five-Year Review</i>	https://www.govinfo.gov/content/pkg/FR-2022-06-21/pdf/2022-13162.pdf
87 FR 58137 September 23, 2022	<i>Circular Welded Carbon-Quality Steel Pipe From Oman, Pakistan, and the United Arab Emirates; Hearing Update for the Subject Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2022-09-23/pdf/2022-20609.pdf
87 FR 62890 October 17, 2022	<i>Circular Welded Carbon-Quality Steel Pipe From Oman, Pakistan, and the United Arab Emirates; Cancellation of Hearing for Full Five-Year Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2022-10-17/pdf/2022-22522.pdf

APPENDIX B

FEDERAL REGISTER NOTICE: CANCELLED HEARING

responsibilities under NAGPRA, 25 U.S.C. 3003(d)(3) and 43 CFR 10.11(d). The determinations in this notice are the sole responsibility of the museum, institution, or Federal agency that has control of the Native American human remains and the associated funerary object. The National Park Service is not responsible for the determinations in this notice.

Consultation

A detailed assessment of the human remains and the associated funerary object was made by the Michigan SHPO professional staff in consultation with representatives of the Bay Mills Indian Community, Michigan; Chippewa Cree Indians of the Rocky Boy's Reservation, Montana (*previously* listed as Chippewa-Cree Indians of the Rocky Boy's Reservation, Montana); Grand Traverse Band of Ottawa and Chippewa Indians, Michigan; Keweenaw Bay Indian Community, Michigan; Lac Vieux Desert Band of Lake Superior Chippewa Indians of Michigan; Little Shell Tribe of Chippewa Indians of Montana; Minnesota Chippewa Tribe, Minnesota (Mille Lacs Band); Saginaw Chippewa Indian Tribe of Michigan; and the Sault Ste. Marie Tribe of Chippewa Indians, Michigan. In addition, the Bad River Band of the Lake Superior Tribe of Chippewa Indians of the Bad River Reservation, Wisconsin; Lac Courte Oreilles Band of Lake Superior Chippewa Indians of Wisconsin; Lac du Flambeau Band of Lake Superior Chippewa Indians of the Lac du Flambeau Reservation of Wisconsin; Minnesota Chippewa Tribe, Minnesota (Bois Forte Band (Nett Lake); Fond du Lac Band; Grand Portage Band; Leech Lake Band; White Earth Band); Ottawa Tribe of Oklahoma; Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin; Red Lake Band of Chippewa Indians, Minnesota; Sokaogon Chippewa Community, Wisconsin; St. Croix Chippewa Indians of Wisconsin; and the Turtle Mountain Band of Chippewa Indians of North Dakota were invited to consult but did not participate. Hereafter all the Indian Tribes listed in this section are referred to as "The Consulted and Invited Tribes."

History and Description of the Human Remains

In October of 1957, human remains and an associated object representing, at minimum, three individuals were removed from the Sun and Snow Mounds site (20WX7) in Wexford County, MI. Records of the University of Michigan Museum of Anthropological Archaeology (UMMAA) note that the

Director of the Cadillac-Wexford Public Library donated the human remains and the associated funerary object to the Museum on December 23, 1957. The human remains reportedly came from two separate burials, but how the site was found and how the human remains and associated funerary object were collected are unclear. The human remains include one child, 4–6 years old; one adolescent, 16–19 years old, possibly male; and one adult, indeterminate sex. The human remains date to the Woodland Period (850 B.C.–A.D. 1400) based on the diagnostic chert blade. No known individuals were identified. The one associated funerary object is one chert blade.

Determinations Made by the Michigan State Historic Preservation Office

Officials of the Michigan State Historic Preservation Office have determined that:

- Pursuant to 25 U.S.C. 3001(9), the human remains described in this notice are Native American based on cranial morphology, dental traits, accession documentation, and archeological context.
- Pursuant to 25 U.S.C. 3001(9), the human remains described in this notice represent the physical remains of three individuals of Native American ancestry.
- Pursuant to 25 U.S.C. 3001(3)(A), the one object described in this notice is reasonably believed to have been placed with or near individual human remains at the time of death or later as part of the death rite or ceremony.
- Pursuant to 25 U.S.C. 3001(2), a relationship of shared group identity cannot be reasonably traced between the Native American human remains and the associated funerary object and any present-day Indian Tribe.
- According to final judgments of the Indian Claims Commission or the Court of Federal Claims, the land from which the Native American human remains were removed is the aboriginal land of The Consulted and Invited Tribes.
- Treaties, Acts of Congress, or Executive Orders, indicate that the land from which the Native American human remains and the associated funerary object were removed is the aboriginal land of The Consulted and Invited Tribes.
- Pursuant to 43 CFR 10.11(c)(1), the disposition of the human remains and the associated funerary object may be to The Consulted and Invited Tribes.

Additional Requestors and Disposition

Representatives of any Indian Tribe or Native Hawaiian organization not identified in this notice that wish to

request transfer of control of these human remains and this associated funerary object should submit a written request with information in support of the request to Michael Hambacher, Staff Archaeologist, State Historic Preservation Office, Michigan Economic Development Corporation, 300 N. Washington Square, Lansing, MI 48913, telephone (517) 243–9513, email hambacherm@michigan.gov, by November 16, 2022. After that date, if no additional requestors have come forward, transfer of control of the human remains and the associated funerary object to The Consulted and Invited Tribes may proceed.

The Michigan State Historic Preservation Office is responsible for notifying The Consulted and Invited Tribes that this notice has been published.

Dated: October 5, 2022.

Melanie O'Brien,

Manager, National NAGPRA Program.

[FR Doc. 2022–22516 Filed 10–14–22; 8:45 am]

BILLING CODE 4312–52–P

INTERNATIONAL TRADE COMMISSION

[Investigation No. 731–TA–1299, 1300, and 1302 (Review)]

Circular Welded Carbon-Quality Steel Pipe From Oman, Pakistan, and the United Arab Emirates; Cancellation of Hearing for Full Five-Year Reviews

AGENCY: United States International Trade Commission.

ACTION: Notice.

DATES: Applicable October 11, 2022.

FOR FURTHER INFORMATION CONTACT: Jordan Harriman ((202) 205–2610), Office of Investigations, U.S. International Trade Commission, 500 E Street SW, Washington, DC 20436. Hearing-impaired persons can obtain information on this matter by contacting the Commission's TDD terminal on 202–205–1810. Persons with mobility impairments who will need special assistance in gaining access to the Commission should contact the Office of the Secretary at 202–205–2000. General information concerning the Commission may also be obtained by accessing its internet server (<http://www.usitc.gov>). The public record for these reviews may be viewed on the Commission's electronic docket (EDIS) at <http://edis.usitc.gov>.

SUPPLEMENTARY INFORMATION: On June 14, 2022, the Commission established a schedule for the conduct of the full five-

year reviews (87 FR 36881, June 21, 2022), and on September 19, 2022, gave notice of updated information related to the conduct of the hearing for these reviews (87 FR 58137, September 23, 2022). On October 4, 2022, counsel for Bull Moose Tube Company, Maruichi American Corporation, and Wheatland Tube Company, and counsel for Nucor Tubular Products Inc., filed requests to appear at the hearing. No other parties submitted a request to appear at the hearing. On October 7, 2022, counsel for these firms filed a request that the Commission cancel the scheduled hearing for these reviews and withdrew their requests to appear at the hearing. Counsel indicated a willingness to submit written responses to any Commission questions in lieu of an actual hearing. Consequently, the public hearing in connection with these reviews, scheduled to begin at 9:30 a.m. on Thursday, October 13, 2022, is cancelled. Parties to these reviews should respond to any written questions posed by the Commission in their posthearing briefs, which are due to be filed on October 25, 2022.

For further information concerning these reviews see the Commission's notice cited above and the Commission's Rules of Practice and Procedure, part 201, subparts A and B (19 CFR part 201), and part 207, subparts A, D, E, and F (19 CFR part 207).

Authority: These reviews are being conducted under authority of title VII of the Tariff Act of 1930; this notice is published pursuant to section 207.62 of the Commission's rules.

By order of the Commission.

Issued: October 12, 2022.

Katherine Hiner,

Acting Secretary to the Commission.

[FR Doc. 2022-22522 Filed 10-14-22; 8:45 am]

BILLING CODE 7020-02-P

NATIONAL AERONAUTICS AND SPACE ADMINISTRATION

[Notice: 22-085)]

National Space-Based Positioning, Navigation, and Timing Advisory Board; Meeting

AGENCY: National Aeronautics and Space Administration.

ACTION: Notice of meeting.

SUMMARY: In accordance with the Federal Advisory Committee Act, as amended, the National Aeronautics and Space Administration (NASA) announces a meeting of the National Space-Based Positioning, Navigation

and Timing (PNT) Advisory Board. This will be the 27th meeting of the PNT Advisory Board.

DATES: Wednesday, November 16, 2022, from 9:30 a.m.–5:30 p.m., Pacific Time; and Thursday, November 17, 2022, from 9 a.m.–12 p.m., Pacific Time.

ADDRESSES: Sonesta Redondo Beach, 300 North Harbor Drive, Redondo Beach, CA 90277.

FOR FURTHER INFORMATION CONTACT: Mr. James Joseph Miller, Designated Federal Officer, PNT Advisory Board, Space Operations Mission Directorate, NASA Headquarters, Washington, DC 20546, (202) 262-0929 or jj.miller@nasa.gov.

SUPPLEMENTARY INFORMATION: This meeting will be open to the public up to the capacity of the meeting room. In-person attendees will be requested to sign a register prior to entrance to the proceedings. Webcast details to watch the meeting remotely will be available on the PNT Advisory Board website at: www.gps.gov/governance/advisory/.

The agenda for the meeting will include the following:

- Updates from PNT Advisory Board Subcommittees:
 - Communications and External Relations (CER) Subcommittee
 - Education and Science Innovation (ESI) Subcommittee
 - Emerging Capabilities, Applications and Sectors (ECAS) Subcommittee
 - International Engagement (IE) Subcommittee
 - Protect, Toughen and Augment (PTA) Subcommittee
 - Strategy, Policy and Governance (SPG) Subcommittee
- Update on U.S. Space-Based Positioning, Navigation and Timing (PNT) Policy and Global Positioning System (GPS) III program development
- Discuss potential improvements to current GPS signal capabilities (authentication, integrity, augmentation, etc.) and GPS user equipment (resistance to jamming, security, resilience, etc.)
- Review of regulatory constraints in the development of multi-GNSS capabilities for improved PNT
- Complementing GPS with other PNT sources
- Deliberations on any findings and recommendations
- Other PNT Advisory Board business and upcoming work plan schedule

For further information, visit the PNT Advisory Board website at: <https://www.gps.gov/governance/advisory/>.

It is imperative that the meeting be held on this date to meet the scheduling availability of key participants.

Carol Hamilton,

Acting Advisory Committee Management Officer, National Aeronautics and Space Administration.

[FR Doc. 2022-22513 Filed 10-14-22; 8:45 am]

BILLING CODE 7510-13-P

NATIONAL AERONAUTICS AND SPACE ADMINISTRATION

[Notice: (22-084)]

Earth Science Advisory Committee; Meeting.

AGENCY: National Aeronautics and Space Administration.

ACTION: Notice of meeting.

SUMMARY: In accordance with the Federal Advisory Committee Act, Public Law 92-463, as amended, the National Aeronautics and Space Administration (NASA) announces a meeting of the Earth Science Advisory Committee (ESAC). This Committee functions in an advisory capacity to the Director, Earth Science Division, in the NASA Science Mission Directorate. The meeting will be held for the purpose of soliciting, from the science community and other persons, scientific and technical information relevant to program planning.

DATES: Monday, October 24, 2022, 12:30 p.m.–1:30 p.m., Eastern Time.

FOR FURTHER INFORMATION CONTACT:

KarShelia Kinard, Science Mission Directorate, NASA Headquarters, Washington, DC 20546, (202) 358-2355 or karshelia.kinard@nasa.gov.

SUPPLEMENTARY INFORMATION: This meeting will be open to the public telephonically. You must use a touch-tone phone to participate in this meeting. Any interested person may dial the USA US toll free number 1-888-381-5773, passcode: 9664949, to participate in this meeting by telephone.

The agenda for the meeting includes the following topic:

—Earth Science Program Annual Performance Review According to the Government Performance and Results Act Modernization Act.

It is imperative that the meeting be held on this date to accommodate the

APPENDIX C
SUMMARY DATA

Table C-1

CWPP: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted

Item	Reported data							
	Calendar year				Jan-Jun			
	2016	2017	2018	2019	2020	2021	2021	2022
U.S. consumption quantity:								
Amount.....	1,773,658	2,108,840	1,868,606	1,763,552	1,657,794	1,675,499	850,120	953,201
Producers' share (fn1).....	55.0	47.5	54.9	63.0	64.5	62.8	66.2	58.0
Importers' share (fn1):								
Oman.....	1.6	2.3	2.9	3.1	2.3	3.5	3.1	4.2
Pakistan.....	0.4	---	0.0	0.0	---	0.0	---	---
United Arab Emirates.....	3.0	5.0	4.5	5.0	6.3	6.8	6.1	7.1
Subject sources.....	5.0	7.3	7.4	8.1	8.6	10.3	9.2	11.3
Nonsubject sources.....	40.1	45.2	37.6	29.0	26.9	26.9	24.6	30.7
All import sources.....	45.0	52.5	45.1	37.0	35.5	37.2	33.8	42.0
U.S. consumption value:								
Amount.....	1,526,608	1,927,847	2,132,072	1,831,024	1,552,008	2,879,054	1,234,185	1,796,587
Producers' share (fn1).....	55.0	50.4	57.6	61.7	64.6	68.8	71.5	61.2
Importers' share (fn1):								
Oman.....	1.1	1.7	2.3	2.7	1.9	2.4	2.0	3.5
Pakistan.....	0.3	---	0.0	0.0	---	0.0	---	---
United Arab Emirates.....	2.1	4.1	3.8	4.6	5.6	4.6	4.2	6.1
Subject sources.....	3.4	5.9	6.1	7.3	7.5	7.0	6.2	9.6
Nonsubject sources.....	41.6	43.7	36.2	30.9	27.9	24.3	22.3	29.1
All import sources.....	45.0	49.6	42.4	38.3	35.4	31.2	28.5	38.8
U.S. imports from:								
Oman:								
Quantity.....	28,147	48,239	53,704	54,699	37,375	59,018	26,594	39,829
Value.....	16,202	33,643	48,306	50,062	29,675	67,933	25,093	62,819
Unit value.....	\$576	\$697	\$899	\$915	\$794	\$1,151	\$944	\$1,577
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Pakistan:								
Quantity.....	7,010	---	535	95	---	57	---	---
Value.....	3,969	---	452	69	---	56	---	---
Unit value.....	\$566	---	\$844	\$726	---	\$981	---	---
Ending inventory quantity.....	***	***	***	***	***	***	***	***
United Arab Emirates:								
Quantity.....	52,872	106,132	84,969	87,388	105,116	113,982	51,845	68,128
Value.....	32,346	79,402	81,828	84,312	87,159	132,809	51,939	110,349
Unit value.....	\$612	\$748	\$963	\$965	\$829	\$1,165	\$1,002	\$1,620
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Subject sources:								
Quantity.....	88,029	154,371	139,208	142,183	142,491	173,057	78,439	107,958
Value.....	52,518	113,045	130,585	134,443	116,834	200,798	77,032	173,168
Unit value.....	\$597	\$732	\$938	\$946	\$820	\$1,160	\$982	\$1,604
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Nonsubject sources:								
Quantity.....	710,744	952,937	702,849	510,997	445,616	450,364	208,994	292,481
Value.....	634,549	842,481	772,491	566,306	432,809	698,216	275,179	523,124
Unit value.....	\$893	\$884	\$1,099	\$1,108	\$971	\$1,550	\$1,317	\$1,789
Ending inventory quantity.....	***	***	***	***	***	***	***	***
All import sources:								
Quantity.....	798,773	1,107,308	842,057	653,179	588,107	623,420	287,434	400,438
Value.....	687,067	955,526	903,076	700,749	549,643	899,014	352,211	696,292
Unit value.....	\$860	\$863	\$1,072	\$1,073	\$935	\$1,442	\$1,225	\$1,739
Ending inventory quantity.....	***	***	***	***	***	***	***	***

Table continued.

Table C-1 Continued

CWP: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted

Item	Period changes						Jan-Jun 2021-22
	2016-21	2016-17	Calendar year		2019-20	2020-21	
			2017-18	2018-19			
U.S. consumption quantity:							
Amount.....	▼(5.5)	▲18.9	▼(11.4)	▼(5.6)	▼(6.0)	▲1.1	▲12.1
Producers' share (fn1).....	▲7.8	▼(7.5)	▲7.4	▲8.0	▲1.6	▼(1.7)	▼(8.2)
Importers' share (fn1):							
Oman.....	▲1.9	▲0.7	▲0.6	▲0.2	▼(0.8)	▲1.3	▲1.1
Pakistan.....	▼(0.4)	▼(0.4)	▲0.0	▼(0.0)	▼(0.0)	▲0.0	---
United Arab Emirates.....	▲3.8	▲2.1	▼(0.5)	▲0.4	▲1.4	▲0.5	▲1.0
Subject sources.....	▲5.4	▲2.4	▲0.1	▲0.6	▲0.5	▲1.7	▲2.1
Nonsubject sources.....	▼(13.2)	▲5.1	▼(7.6)	▼(8.6)	▼(2.1)	▼(0.0)	▲6.1
All import sources.....	▼(7.8)	▲7.5	▼(7.4)	▼(8.0)	▼(1.6)	▲1.7	▲8.2
U.S. consumption value:							
Amount.....	▲88.6	▲26.3	▲10.6	▼(14.1)	▼(15.2)	▲85.5	▲45.6
Producers' share (fn1).....	▲13.8	▼(4.6)	▲7.2	▲4.1	▲2.9	▲4.2	▼(10.2)
Importers' share (fn1):							
Oman.....	▲1.3	▲0.7	▲0.5	▲0.5	▼(0.8)	▲0.4	▲1.5
Pakistan.....	▼(0.3)	▼(0.3)	▲0.0	▼(0.0)	▼(0.0)	▲0.0	---
United Arab Emirates.....	▲2.5	▲2.0	▼(0.3)	▲0.8	▲1.0	▼(1.0)	▲1.9
Subject sources.....	▲3.5	▲2.4	▲0.3	▲1.2	▲0.2	▼(0.6)	▲3.4
Nonsubject sources.....	▼(17.3)	▲2.1	▼(7.5)	▼(5.3)	▼(3.0)	▼(3.6)	▲6.8
All import sources.....	▼(13.8)	▲4.6	▼(7.2)	▼(4.1)	▼(2.9)	▼(4.2)	▲10.2
U.S. imports from:							
Oman:							
Quantity.....	▲109.7	▲71.4	▲11.3	▲1.9	▼(31.7)	▲57.9	▲49.8
Value.....	▲319.3	▲107.6	▲43.6	▲3.6	▼(40.7)	▲128.9	▲150.3
Unit value.....	▲100.0	▲21.2	▲29.0	▲1.7	▼(13.2)	▲45.0	▲67.2
Ending inventory quantity.....	▼***	▼***	***	***	***	***	***
Pakistan:							
Quantity.....	▼(99.2)	▼(100.0)	▲---	▼(82.2)	▼(100.0)	▲---	---
Value.....	▼(98.6)	▼(100.0)	▲---	▼(84.6)	▼(100.0)	▲---	---
Unit value.....	▲73.3	▼(100.0)	▲---	▼(13.9)	▼(100.0)	▲---	---
Ending inventory quantity.....	***	***	***	***	***	***	***
United Arab Emirates:							
Quantity.....	▲115.6	▲100.7	▼(19.9)	▲2.8	▲20.3	▲8.4	▲31.4
Value.....	▲310.6	▲145.5	▲3.1	▲3.0	▲3.4	▲52.4	▲112.5
Unit value.....	▲90.5	▲22.3	▲28.7	▲0.2	▼(14.1)	▲40.5	▲61.7
Ending inventory quantity.....	▲***	▲***	▲***	▼***	▼***	▲***	▼***
Subject sources:							
Quantity.....	▲96.6	▲75.4	▼(9.8)	▲2.1	▲0.2	▲21.5	▲37.6
Value.....	▲282.3	▲115.3	▲15.5	▲3.0	▼(13.1)	▲71.9	▲124.8
Unit value.....	▲94.5	▲22.7	▲28.1	▲0.8	▼(13.3)	▲41.5	▲63.3
Ending inventory quantity.....	▲***	▼***	▲***	▼***	▼***	▲***	▼***
Nonsubject sources:							
Quantity.....	▼(36.6)	▲34.1	▼(26.2)	▼(27.3)	▼(12.8)	▲1.1	▲39.9
Value.....	▲10.0	▲32.8	▼(8.3)	▼(26.7)	▼(23.6)	▲61.3	▲90.1
Unit value.....	▲73.6	▼(1.0)	▲24.3	▲0.8	▼(12.4)	▲59.6	▲35.8
Ending inventory quantity.....	▼***	▼***	▼***	▼***	▲***	▲***	▲***
All import sources:							
Quantity.....	▼(22.0)	▲38.6	▼(24.0)	▼(22.4)	▼(10.0)	▲6.0	▲39.3
Value.....	▲30.8	▲39.1	▼(5.5)	▼(22.4)	▼(21.6)	▲63.6	▲97.7
Unit value.....	▲67.7	▲0.3	▲24.3	▲0.0	▼(12.9)	▲54.3	▲41.9
Ending inventory quantity.....	▲***	▼***	▼***	▼***	▼***	▲***	▼***

Table continued.

Table C-1 Continued

CWP: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted

Item	Reported data							
	2016	2017	Calendar year		2020	2021	Jan-Jun	
			2018	2019			2021	2022
U.S. producers ¹ :								
Average capacity quantity.....	1,503,724	1,570,888	1,544,415	1,564,371	1,581,769	1,602,677	793,159	828,788
Production quantity.....	1,016,201	1,030,736	1,059,877	1,115,082	1,089,586	1,078,306	577,061	568,024
Capacity utilization (fn1).....	67.6	65.6	68.6	71.3	68.9	67.3	72.8	68.5
U.S. shipments:								
Quantity.....	974,885	1,001,532	1,026,549	1,110,373	1,069,687	1,052,079	562,686	552,763
Value.....	839,541	972,321	1,228,996	1,130,275	1,002,365	1,980,040	881,974	1,100,295
Unit value.....	\$861	\$971	\$1,197	\$1,018	\$937	\$1,882	\$1,567	\$1,991
Export shipments:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	86,200	85,176	133,428	124,995	120,981	124,658	120,934	127,799
Inventories/total shipments (fn1).....	***	***	***	***	***	***	***	***
Production workers.....	1,800	1,855	1,893	1,909	1,876	1,925	1,900	2,031
Hours worked (1,000s).....	3,829	4,027	4,081	4,115	4,037	4,101	2,036	2,085
Wages paid (\$1,000).....	120,085	124,270	143,824	145,899	160,752	166,303	78,352	85,186
Hourly wages (dollars per hour).....	\$31.36	\$30.86	\$35.24	\$35.46	\$39.82	\$40.55	\$38.48	\$40.86
Productivity (short tons per 1,000 hours).....	265.4	256.0	259.7	271.0	269.9	262.9	283.4	272.4
Unit labor costs.....	\$118	\$121	\$136	\$131	\$148	\$154	\$136	\$150
Net sales:								
Quantity.....	989,241	1,011,269	1,030,645	1,111,214	1,077,904	1,056,900	567,947	556,176
Value.....	847,916	978,021	1,231,459	1,129,771	1,008,043	1,987,661	889,989	1,101,075
Unit value.....	\$857	\$967	\$1,195	\$1,017	\$935	\$1,881	\$1,567	\$1,980
Cost of goods sold (COGS).....	***	***	***	***	***	***	***	***
Gross profit or (loss) (fn2).....	***	***	***	***	***	***	***	***
SG&A expenses.....	71,761	87,098	113,779	71,778	92,499	155,721	43,792	51,108
Operating income or (loss) (fn2).....	***	***	***	***	***	***	***	***
Net income or (loss) (fn2).....	***	***	***	***	***	***	***	***
Unit COGS.....	***	***	***	***	***	***	***	***
Unit SG&A expenses.....	\$73	\$86	\$110	\$65	\$86	\$147	\$77	\$92
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.....	20,359	17,466	32,726	35,431	57,078	58,158	25,946	30,980
Research and development expenses.....	***	***	***	***	***	***	***	***
Net assets.....	***	***	***	***	***	***	***	***

Table continued.

Table C-1 Continued

CWP: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted

Item	Period changes						
	2016-21	2016-17	Calendar year		2019-20	2020-21	Jan-Jun 2021-22
			2017-18	2018-19			
U.S. producers':							
Average capacity quantity.....	▲6.6	▲4.5	▼(1.7)	▲1.3	▲1.1	▲1.3	▲4.5
Production quantity.....	▲6.1	▲1.4	▲2.8	▲5.2	▼(2.3)	▼(1.0)	▼(1.6)
Capacity utilization (fn1).....	▼(0.3)	▼(2.0)	▲3.0	▲2.7	▼(2.4)	▼(1.6)	▼(4.2)
U.S. shipments:							
Quantity.....	▲7.9	▲2.7	▲2.5	▲8.2	▼(3.7)	▼(1.6)	▼(1.8)
Value.....	▲135.8	▲15.8	▲26.4	▼(8.0)	▼(11.3)	▲97.5	▲24.8
Unit value.....	▲118.5	▲12.7	▲23.3	▼(15.0)	▼(7.9)	▲100.8	▲27.0
Export shipments:							
Quantity.....	▼***	▼***	▼***	▼***	▲***	▼***	▼***
Value.....	▲***	▼***	▼***	▼***	▲***	▲***	▼***
Unit value.....	▲***	▲***	▲***	▼***	▼***	▲***	▼***
Ending inventory quantity.....	▲44.6	▼(1.2)	▲56.6	▼(6.3)	▼(3.2)	▲3.0	▲5.7
Inventories/total shipments (fn1).....	▲***	▼***	▲***	▼***	▼***	▲***	▲***
Production workers.....	▲6.9	▲3.1	▲2.0	▲0.8	▼(1.7)	▲2.6	▲6.9
Hours worked (1,000s).....	▲7.1	▲5.2	▲1.3	▲0.8	▼(1.9)	▲1.6	▲2.4
Wages paid (\$1,000).....	▲38.5	▲3.5	▲15.7	▲1.4	▲10.2	▲3.5	▲8.7
Hourly wages (dollars per hour).....	▲29.3	▼(1.6)	▲14.2	▲0.6	▲12.3	▲1.8	▲6.2
Productivity (short tons per 1,000 hours).....	▼(0.9)	▼(3.6)	▲1.5	▲4.3	▼(0.4)	▼(2.6)	▼(3.9)
Unit labor costs.....	▲30.5	▲2.0	▲12.6	▼(3.6)	▲12.8	▲4.5	▲10.5
Net sales:							
Quantity.....	▲6.8	▲2.2	▲1.9	▲7.8	▼(3.0)	▼(1.9)	▼(2.1)
Value.....	▲134.4	▲15.3	▲25.9	▼(8.3)	▼(10.8)	▲97.2	▲23.7
Unit value.....	▲119.4	▲12.8	▲23.5	▼(14.9)	▼(8.0)	▲101.1	▲26.3
Cost of goods sold (COGS).....	▲***	▲***	▲***	▼***	▼***	▲***	▲***
Gross profit or (loss) (fn2).....	▲***	▼***	▲***	▼***	▲***	▲***	▲***
SG&A expenses.....	▲117.0	▲21.4	▲30.6	▼(36.9)	▲28.9	▲68.3	▲16.7
Operating income or (loss) (fn2).....	▲***	▼***	▲***	▼***	▲***	▲***	▼***
Net income or (loss) (fn2).....	▲***	▼***	▲***	▼***	▲***	▲***	▼***
Unit COGS.....	▲***	▲***	▲***	▼***	▼***	▲***	▲***
Unit SG&A expenses.....	▲103.1	▲18.7	▲28.2	▼(41.5)	▲32.9	▲71.7	▲19.2
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.....	▲185.7	▼(14.2)	▲87.4	▲8.3	▲61.1	▲1.9	▲19.4
Research and development expenses.....	***	***	***	***	***	***	***
Net assets.....	▲***	▲***	▼***	▼***	▲***	▲***	***

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090 accessed August 30, 2022. Imports are based on the imports for consumption data series. Imports values are reported on a landed, (normal) duty-paid value.

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

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

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

APPENDIX D

FIRM NARRATIVES ON IMPACT OF ORDERS

Table D-1

CWP: Firms' narratives on the impact of the orders and the likely impact of revocation

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Effect of order	Importers	***
Effect of order	Importers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Effect of orders	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Likely impact of revocation	Foreign producers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***

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

APPENDIX E

DATA ACCOMPANYING DEMAND FIGURES IN PART II

Tables E-1, E-2, and E-3 present data shown in figures II-1, II-2, and II-3, respectively.

Table E-1

GDP: Gross domestic product, trillions of dollars, seasonally adjusted annual rate, by quarter, first quarter of 2016–second quarter of 2022

GDP in trillions of dollars

Period	GDP
2016 Q1	18.4
2016 Q2	18.6
2016 Q3	18.8
2016 Q4	19.0
2017 Q1	19.2
2017 Q2	19.3
2017 Q3	19.6
2017 Q4	19.9
2018 Q1	20.1
2018 Q2	20.5
2018 Q3	20.7
2018 Q4	20.8
2019 Q1	21.0
2019 Q2	21.3
2019 Q3	21.5
2019 Q4	21.7
2020 Q1	21.5
2020 Q2	19.5
2020 Q3	21.1
2020 Q4	21.5
2021 Q1	22.0
2021 Q2	22.7
2021 Q3	23.2
2021 Q4	24.0
2022 Q1	24.4
2022 Q2	24.9

Source: U.S. Bureau of Economic Analysis, National Income and Product Accounts-Table 1.1.5, Gross Domestic Product, available at <https://apps.bea.gov/iTable/iTable.cfm?reqid=19&step=2#reqid=19&step=2&isuri=1&1921=survey>, retrieved September 11, 2022.

Table E-2
U.S. construction spending: Value of construction put in place, residential and non-residential construction, seasonally adjusted annual rate, billions of dollars, monthly, January 2016–August 2022

Spending in billions of dollars

Period	Residential construction spending	Non-residential construction spending
2016 M1	462.7	708.6
2016 M2	468.6	713.1
2016 M3	475.9	724.8
2016 M4	474.9	723.7
2016 M5	475.5	728.0
2016 M6	481.0	745.7
2016 M7	483.4	742.4
2016 M8	487.8	743.8
2016 M9	489.3	751.6
2016 M10	503.6	746.8
2016 M11	511.3	764.6
2016 M12	518.9	761.7
2017 M1	517.4	735.9
2017 M2	538.2	738.1
2017 M3	534.0	738.0
2017 M4	539.8	731.5
2017 M5	543.9	741.2
2017 M6	543.9	733.9
2017 M7	548.9	728.2
2017 M8	548.7	726.2
2017 M9	551.0	730.4
2017 M10	544.3	738.0
2017 M11	568.4	737.2
2017 M12	571.2	742.3
2018 M1	577.3	757.9
2018 M2	583.3	772.4
2018 M3	578.7	766.6
2018 M4	581.3	775.7
2018 M5	585.4	779.5
2018 M6	576.8	769.5
2018 M7	567.1	771.3
2018 M8	556.8	782.7
2018 M9	556.4	769.2
2018 M10	541.3	767.2
2018 M11	543.4	753.6
2018 M12	523.1	764.8

Table continued.

Table E-2--Continued**U.S. construction spending: Value of construction put in place, residential and non-residential construction, seasonally adjusted annual rate, billions of dollars, monthly, January 2016–August 2022**

Spending in billions of dollars

Period	Residential construction spending	Non-residential construction spending
2019 M1	522.8	771.6
2019 M2	522.4	790.0
2019 M3	523.8	800.0
2019 M4	530.5	827.6
2019 M5	538.2	829.7
2019 M6	549.1	837.8
2019 M7	561.0	852.0
2019 M8	566.1	858.9
2019 M9	569.4	865.6
2019 M10	572.5	864.3
2019 M11	585.4	874.4
2019 M12	591.2	872.3
2020 M1	605.8	884.2
2020 M2	617.0	884.8
2020 M3	627.2	881.7
2020 M4	607.9	858.3
2020 M5	600.3	861.6
2020 M6	603.0	860.2
2020 M7	624.3	850.7
2020 M8	648.0	838.8
2020 M9	667.5	837.6
2020 M10	687.3	838.5
2020 M11	707.8	835.2
2020 M12	728.7	837.7
2021 M1	744.6	838.8
2021 M2	747.9	822.0
2021 M3	768.1	832.4
2021 M4	780.1	828.4
2021 M5	797.7	824.2
2021 M6	808.7	819.3
2021 M7	815.5	821.8
2021 M8	820.6	821.0
2021 M9	823.2	809.7
2021 M10	825.9	818.4
2021 M11	833.0	832.2
2021 M12	852.3	828.7

Table continued.

Table E-2--Continued

U.S. construction spending: Value of construction put in place, residential and non-residential construction, seasonally adjusted annual rate, billions of dollars, monthly, January 2016–August 2022

Spending in billions of dollars

Period	Residential construction spending	Non-residential construction spending
2022 M1	890.8	835.8
2022 M2	912.0	841.1
2022 M3	929.0	839.1
2022 M4	940.6	840.3
2022 M5	954.5	839.3
2022 M6	946.8	857.0
2022 M7	930.9	862.6
2022 M8	922.0	859.3

Source: United States Census Bureau, Construction Spending, available at https://www.census.gov/construction/c30/historical_data.html, retrieved October 25, 2022.

Table E-3
Crude oil and natural gas prices: Crude oil West Texas Intermediate spot price (dollars per barrel)
and Natural gas Henry Hub spot price (dollars per million btu), monthly, January 2016–September
2022 actual, October 2022-December 2023 projected

Crude oil in dollars per barrel; Natural gas in dollars per million btu

Period	Crude oil (dollars barrel)	Natural gas (dollars per million btu)
2016 M1	31.68	2.28
2016 M2	30.32	1.99
2016 M3	37.55	1.73
2016 M4	40.75	1.92
2016 M5	46.71	1.92
2016 M6	48.76	2.59
2016 M7	44.65	2.82
2016 M8	44.72	2.82
2016 M9	45.18	2.99
2016 M10	49.77	2.98
2016 M11	45.66	2.55
2016 M12	51.97	3.59
2017 M1	52.50	3.30
2017 M2	53.47	2.85
2017 M3	49.33	2.88
2017 M4	51.06	3.10
2017 M5	48.48	3.15
2017 M6	45.18	2.98
2017 M7	46.63	2.98
2017 M8	48.04	2.90
2017 M9	49.82	2.98
2017 M10	51.58	2.88
2017 M11	56.64	3.01
2017 M12	57.88	2.82
2018 M1	63.70	3.69
2018 M2	62.23	2.67
2018 M3	62.73	2.69
2018 M4	66.25	2.80
2018 M5	69.98	2.80
2018 M6	67.87	2.97
2018 M7	70.98	2.83
2018 M8	68.06	2.96
2018 M9	70.23	3.00
2018 M10	70.75	3.28
2018 M11	56.96	4.09
2018 M12	49.52	4.04

Table continued.

Table E-3--Continued

Crude oil and natural gas prices: Crude oil West Texas Intermediate spot price (dollars per barrel) and Natural gas Henry Hub spot price (dollars per million btu), monthly, January 2016–September 2022 actual, October 2022-December 2023 projected

Crude oil in dollars per barrel; Natural gas in dollars per million btu

Period	Crude oil (dollars barrel)	Natural gas (dollars per million btu)
2019 M1	51.38	3.11
2019 M2	54.95	2.69
2019 M3	58.15	2.95
2019 M4	63.86	2.65
2019 M5	60.83	2.64
2019 M6	54.66	2.40
2019 M7	57.35	2.37
2019 M8	54.80	2.22
2019 M9	56.95	2.56
2019 M10	53.96	2.33
2019 M11	57.03	2.65
2019 M12	59.88	2.22
2020 M1	57.52	2.02
2020 M2	50.54	1.91
2020 M3	29.21	1.79
2020 M4	16.55	1.74
2020 M5	28.56	1.75
2020 M6	38.31	1.63
2020 M7	40.71	1.77
2020 M8	42.34	2.30
2020 M9	39.63	1.92
2020 M10	39.40	2.39
2020 M11	40.94	2.61
2020 M12	47.02	2.59
2021 M1	52.00	2.71
2021 M2	59.04	5.35
2021 M3	62.33	2.62
2021 M4	61.72	2.66
2021 M5	65.17	2.91
2021 M6	71.38	3.26
2021 M7	72.49	3.84
2021 M8	67.73	4.07
2021 M9	71.65	5.16
2021 M10	81.48	5.51
2021 M11	79.15	5.05
2021 M12	71.71	3.76

Table continued.

Table E-3--Continued**Crude oil and natural gas prices: Crude oil West Texas Intermediate spot price (dollars per barrel) and Natural gas Henry Hub spot price (dollars per million btu), monthly, January 2016–September 2022 actual, October 2022-December 2023 projected**

Crude oil in dollars per barrel; Natural gas in dollars per million btu

Period	Crude oil (dollars barrel)	Natural gas (dollars per million btu)
2022 M1	83.22	4.38
2022 M2	91.64	4.69
2022 M3	108.50	4.90
2022 M4	101.78	6.59
2022 M5	109.55	8.14
2022 M6	114.84	7.70
2022 M7	101.62	7.28
2022 M8	93.67	8.80
2022 M9	84.26	7.88
2022 M10	87.00	7.14
2022 M11	86.00	7.48
2022 M12	85.00	7.60
2023 M1	87.00	7.67
2023 M2	88.00	7.18
2023 M3	87.00	6.53
2023 M4	87.00	5.28
2023 M5	87.00	5.24
2023 M6	88.00	5.29
2023 M7	88.00	5.33
2023 M8	89.00	5.33
2023 M9	90.00	5.25
2023 M10	90.00	5.27
2023 M11	91.00	5.39
2023 M12	91.00	5.53

Source: U.S. Energy Information Administration, U.S. Energy Markets Summary, available at <https://www.eia.gov/outlooks/steo/data/browser/#/?v=3&f=M&s=&start=201601&end=202312&linechart=COPRUS&ctype=linechart&maptype=0&id=>, retrieved October 25 2022.

APPENDIX F

U.S. AND FOREIGN PRODUCERS' SHIPMENTS BY ATTRIBUTE

Table F-1**CWP: U.S. producers' U.S. shipments and foreign producers' total shipments in 2021, by wall thickness and source**

Quantity in short tons

Wall thickness	U.S. producers	Oman	Pakistan	UAE	Foreign subject producers	U.S. producers and foreign producers
Schedule 5s and 5	***	***	***	***	***	***
Schedule 10s and 10	***	***	***	***	***	***
Schedule 20, 30, 40s, and 40	***	***	***	***	***	***
All other wall thicknesses	***	***	***	***	***	***
All wall thicknesses	***	***	***	***	***	***

Table continued.

Table F-1 Continued**CWP: U.S. producers' U.S. shipments and foreign producers' total shipments in 2021, by wall thickness and source**

Share across in percent

Wall thickness	U.S. producers	Oman	Pakistan	UAE	Foreign subject producers	U.S. producers and foreign producers
Schedule 5s and 5	***	***	***	***	***	***
Schedule 10s and 10	***	***	***	***	***	***
Schedule 20, 30, 40s, and 40	***	***	***	***	***	***
All other wall thicknesses	***	***	***	***	***	***
All wall thicknesses	***	***	***	***	***	***

Table continued.

Table F-1 Continued

CWP: U.S. producers' U.S. shipments and foreign producers' total shipments in 2021, by wall thickness and source

Share down in percent

Wall thickness	U.S. producers	Oman	Pakistan	UAE	Foreign subject producers	U.S. producers and foreign producers
Schedule 5s and 5	***	***	***	***	***	***
Schedule 10s and 10	***	***	***	***	***	***
Schedule 20, 30, 40s, and 40	***	***	***	***	***	***
All other wall thicknesses	***	***	***	***	***	***
All wall thicknesses	***	***	***	***	***	***

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.

Figure F-1

CWP: U.S. producers' U.S. shipments and foreign producers' total shipments in 2021, by wall thickness and source, 2021

* * * * *

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

Table F-2**CWP: U.S. producers' U.S. shipments and foreign producers' total shipments in 2021, by wall thickness and source**

Quantity in short tons

Normal pipe size (NPS) range	U.S. producers	Oman	Pakistan	UAE	Foreign subject producers	U.S. producers and foreign producers
1/2 to 2 nominal pipe size	***	***	***	***	***	***
2 1/2 to 3 1/2	***	***	***	***	***	***
4 to 8 nominal pipe size	***	***	***	***	***	***
9 to 16 nominal pipe size	***	***	***	***	***	***
All nominal pipe sizes	***	***	***	***	***	***

Table continued.

Table F-2 Continued**CWP: U.S. producers' U.S. shipments and foreign producers' total shipments in 2021, by wall thickness and source**

Share across in percent

Normal pipe size (NPS) range	U.S. producers	Oman	Pakistan	UAE	Foreign subject producers	U.S. producers and foreign producers
1/2 to 2 nominal pipe size	***	***	***	***	***	***
2 1/2 to 3 1/2	***	***	***	***	***	***
4 to 8 nominal pipe size	***	***	***	***	***	***
9 to 16 nominal pipe size	***	***	***	***	***	***
All nominal pipe sizes	***	***	***	***	***	***

Table continued.

Table F-2 Continued

CWP: U.S. producers' U.S. shipments and foreign producers' total shipments in 2021, by wall thickness and source

Share down in percent

Normal pipe size (NPS) range	U.S. producers	Oman	Pakistan	UAE	Foreign subject producers	U.S. producers and foreign producers
1/2 to 2 nominal pipe size	***	***	***	***	***	***
2 1/2 to 3 1/2	***	***	***	***	***	***
4 to 8 nominal pipe size	***	***	***	***	***	***
9 to 16 nominal pipe size	***	***	***	***	***	***
All nominal pipe sizes	***	***	***	***	***	***

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.

Figure F-2

CWP: U.S. producers' U.S. shipments and foreign producers' total shipments in 2021, by nominal pipe size and source, 2021

* * * * *

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

Table F-3**CWP: U.S. producers' U.S. shipments and foreign producers' total shipments in 2021, by wall thickness and source**

Quantity in short tons

Standard(s)	U.S. producers	Oman	Pakistan	UAE	Foreign subject producers	U.S. producers and foreign producers
ASTM A53	***	***	***	***	***	***
ASTM A135/A795	***	***	***	***	***	***
ASTM A500/A252	***	***	***	***	***	***
In-scope fencing standards	***	***	***	***	***	***
Other/ multiple/ or no standards	***	***	***	***	***	***
All standards or lack thereof	***	***	***	***	***	***

Table continued.

Table F-3 Continued**CWP: U.S. producers' U.S. shipments and foreign producers' total shipments in 2021, by wall thickness and source**

Share across in percent

Standard(s)	U.S. producers	Oman	Pakistan	UAE	Foreign subject sources	U.S. producers and foreign producers
ASTM A53	***	***	***	***	***	***
ASTM A135/A795	***	***	***	***	***	***
ASTM A500/A252	***	***	***	***	***	***
In-scope fencing standards	***	***	***	***	***	***
Other/ multiple/ or no standards	***	***	***	***	***	***
All standards or lack thereof	***	***	***	***	***	***

Table continued.

Table F-3 Continued

CWP: U.S. producers' U.S. shipments and foreign producers' total shipments in 2021, by wall thickness and source

Share down in percent

Standard(s)	U.S. producers	Oman	Pakistan	UAE	Foreign subject sources	U.S. producers and foreign producers
ASTM A53	***	***	***	***	***	***
ASTM A135/A795	***	***	***	***	***	***
ASTM A500/A252	***	***	***	***	***	***
In-scope fencing standards	***	***	***	***	***	***
Other/ multiple/ or no standards	***	***	***	***	***	***
All standards or lack thereof	***	***	***	***	***	***

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.

Figure F-3

CWP: U.S. producers' U.S. shipments and foreign producers' total shipments in 2021, by all standards and source, 2021

* * * * *

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

Table F-4**CWP: U.S. producers' U.S. shipments and foreign producers' total shipments in 2021, by wall thickness and source**

Quantity in short tons

Source	Grade A	Grade B	Other grades	All grades
U.S. producers	***	***	***	***
Oman	***	***	***	***
Pakistan	***	***	***	***
UAE	***	***	***	***
Foreign subject sources	***	***	***	***
U.S. producers and foreign sources	***	***	***	***

Table continued.

Table F-4 Continued**CWP: U.S. producers' U.S. shipments and foreign producers' total shipments in 2021, by wall thickness and source**

Share across in percent

Source	Grade A	Grade B	Other grades	All grades
U.S. producers	***	***	***	***
Oman	***	***	***	***
Pakistan	***	***	***	***
UAE	***	***	***	***
Foreign subject sources	***	***	***	***
U.S. producers and foreign sources	***	***	***	***

Table continued.

Table F-4 Continued
CWP: U.S. producers' U.S. shipments and foreign producers' total shipments in 2021, by wall thickness and source

Share down in percent

Source	Grade A	Grade B	Other grades	All grades
U.S. producers	***	***	***	***
Oman	***	***	***	***
Pakistan	***	***	***	***
UAE	***	***	***	***
Foreign subject sources	***	***	***	***
U.S. producers and foreign sources	***	***	***	***

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.

Figure F-4
CWP: U.S. producers' U.S. shipments and foreign producers' total shipments in 2021, by source and grade of steel, 2021

* * * * *

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

APPENDIX G

DATA ACCOMPANYING RAW MATERIAL AND PRICE TREND FIGURES IN PART V

Tables G-1, G-2, and G-3 present the data shown in figures V-1, V-2, and V-3, respectively.

Table G-1**Raw material prices: Hot-rolled coil index (U.S. domestic fob mill) and Zinc (LME cash price for SHG), dollars per metric ton, monthly, January 2016–September 2022**

Hot-rolled coil in dollars per metric ton; Zinc in dollars per metric ton

Period	Hot-rolled coil (dollars per metric ton)	Zinc (dollars per metric ton)
2016 M1	***	***
2016 M2	***	***
2016 M3	***	***
2016 M4	***	***
2016 M5	***	***
2016 M6	***	***
2016 M7	***	***
2016 M8	***	***
2016 M9	***	***
2016 M10	***	***
2016 M11	***	***
2016 M12	***	***
2017 M1	***	***
2017 M2	***	***
2017 M3	***	***
2017 M4	***	***
2017 M5	***	***
2017 M6	***	***
2017 M7	***	***
2017 M8	***	***
2017 M9	***	***
2017 M10	***	***
2017 M11	***	***
2017 M12	***	***
2018 M1	***	***
2018 M2	***	***
2018 M3	***	***
2018 M4	***	***
2018 M5	***	***
2018 M6	***	***
2018 M7	***	***
2018 M8	***	***
2018 M9	***	***
2018 M10	***	***
2018 M11	***	***
2018 M12	***	***

Table continued.

Table G-1--Continued**Raw material prices: Hot-rolled coil index (U.S. domestic fob mill) and Zinc (LME cash price for SHG), dollars per metric ton, monthly, January 2016–September 2022**

Hot-rolled coil in dollars per metric ton; Zinc in dollars per metric ton

Period	Hot-rolled coil (dollars per metric ton)	Zinc (dollars per metric ton)
2019 M1	***	***
2019 M2	***	***
2019 M3	***	***
2019 M4	***	***
2019 M5	***	***
2019 M6	***	***
2019 M7	***	***
2019 M8	***	***
2019 M9	***	***
2019 M10	***	***
2019 M11	***	***
2019 M12	***	***
2020 M1	***	***
2020 M2	***	***
2020 M3	***	***
2020 M4	***	***
2020 M5	***	***
2020 M6	***	***
2020 M7	***	***
2020 M8	***	***
2020 M9	***	***
2020 M10	***	***
2020 M11	***	***
2020 M12	***	***
2021 M1	***	***
2021 M2	***	***
2021 M3	***	***
2021 M4	***	***
2021 M5	***	***
2021 M6	***	***
2021 M7	***	***
2021 M8	***	***
2021 M9	***	***
2021 M10	***	***
2021 M11	***	***
2021 M12	***	***

Table continued.

Table G-1--Continued

Raw material prices: Hot-rolled coil index (U.S. domestic fob mill) and Zinc (LME cash price for SHG), dollars per metric ton, monthly, January 2016–September 2022

Hot-rolled coil in dollars per metric ton; Zinc in dollars per metric ton

Period	Hot-rolled coil (dollars per metric ton)	Zinc (dollars per metric ton)
2022 M1	***	***
2022 M2	***	***
2022 M3	***	***
2022 M4	***	***
2022 M5	***	***
2022 M6	***	***
2022 M7	***	***
2022 M8	***	***
2022 M9	***	***

Source: World Bank Commodity Price Data (The Pink Sheet), October 2022; Fastmarkets/AMM.

Table G-2
CWP: Indexed price changes of products 1-4 (grades A and B combined) from the United States,
by quarter, first quarter of 2016-second quarter of 2022

Indexed prices in percent; Indexed to the first quarter of 2016

Period	Product 1	Product 2	Product 3	Product 4
2016 Q1	100	100	100	100
2016 Q2	***	***	***	***
2016 Q3	***	***	***	***
2016 Q4	***	***	***	***
2017 Q1	***	***	***	***
2017 Q2	***	***	***	***
2017 Q3	***	***	***	***
2017 Q4	***	***	***	***
2018 Q1	***	***	***	***
2018 Q2	***	***	***	***
2018 Q3	***	***	***	***
2018 Q4	***	***	***	***
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 in response to Commission questionnaires.

Table G-3
CWP: Indexed price changes of products 1-4 (grades A and B combined) from subject import sources, by quarter, first quarter of 2016-second quarter of 2022

Indexed prices in percent; Indexed to the first quarter of 2016

Period	Product 1	Product 2	Product 3	Product 4
2016 Q1	100	100	100	100
2016 Q2	***	***	***	***
2016 Q3	***	***	***	***
2016 Q4	***	***	***	***
2017 Q1	***	***	***	***
2017 Q2	***	***	***	***
2017 Q3	***	***	***	***
2017 Q4	***	***	***	***
2018 Q1	***	***	***	***
2018 Q2	***	***	***	***
2018 Q3	***	***	***	***
2018 Q4	***	***	***	***
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 in response to Commission questionnaires.

APPENDIX H
PRICE DATA BY GRADE

As discussed in part V, firms were requested to report four pricing products separately by grade, specifically grade A and grade B.^{1 2} Aggregated price data for products 1-4, with grade A and grade B combined, are presented in tables V-5 to V-8 and figures V-2 to V-5. Tables H-1 through H-8 and figures H-1 through H-8 present disaggregated pricing data for products 1-4 by grade.

Two U.S. producers and six importers provided usable pricing data for sales of grade A products 1-4, and four U.S. producers and six importers provided usable pricing data for sales of grade B products 1-4, although not all firms reported pricing for all products for all quarters.^{3 4} Pricing data for sales of grade A products 1-4 reported by these firms accounted for approximately *** percent of U.S. producers' reported U.S. commercial shipments of CWP and *** percent of reported U.S. commercial shipments of subject imports from the UAE in 2021.⁵ Pricing data for sales of grade B products 1-4 reported by these firms accounted for approximately *** percent of U.S. producers' reported U.S. commercial shipments of CWP and *** percent of reported U.S. commercial shipments of subject imports from the UAE in 2021.⁶ No importer provided price data for subject imports from Pakistan.

As shown in tables H-9 and H-10, prices increased for both grade A and grade B CWP during January 2016-June 2022. Domestic price increases for grade A product during this time

¹ The pricing products were as follows: **Product 1**--ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 2–4 inches inclusive; **Product 2**--ASTM A53 schedule 40 galvanized plain-end, with nominal outside diameter of 2–4 inches inclusive; **Product 3**--ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 6–8 inches inclusive; and **Product 4**--ASTM A53 and/or F1083 schedule 40 galvanized fence tube, with nominal outside diameter of 1-1/4–3 inches, inclusive.

² Grades A and B refer to the chemical composition of the steel that is used to produce the pipe and is typically determined by the ASTM specifications. The Universal Respondents argue that grade B is typically higher quality and more expensive. See Universal Respondents' comments on draft questionnaires, p. 2.

³ 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.

⁴ As indicated in part V, some firms provided data for quarterly quantities of as little as one or two short tons. Since the questionnaire issued by the Commission is programmed to round to the nearest integer, reported quarterly quantities of 1-2 short tons can lead to distorted and non-representative average unit values. See EDIS document no. 779516. For this reason, all reported quantities of two short tons or less have been removed from the pricing data.

⁵ The reported pricing data for sales of grade A product from Oman accounted for approximately *** percent of reported U.S. commercial shipments of subject imports from Oman ***.

⁶ The reported pricing data for sales of grade B product from for Oman accounted for approximately *** percent of reported U.S. commercial shipments of subject imports from Oman ***.

ranged from *** percent (for product ***) to *** percent (for product ***), while price increases for grade A imports from the UAE ranged from *** percent (for product ***) to *** percent (for product ***). Domestic price increases for grade B product during this time ranged from *** percent (for product ***) to *** percent (for product ***), while price increases for grade B imports from the UAE ranged from *** percent (for product ***) to *** percent (for product ***).

As shown in table H-11, subject imports mostly undersold domestic grade A CWP on *** and entirely undersold domestic CWP on *** by margins ranging from *** to *** percent. CWP oversold domestic grade A *** in *** of 27 quarterly instances by margins ranging from *** to *** percent. As shown in table H-12, subject imports mostly undersold domestic grade B CWP on *** and entirely undersold domestic CWP on *** by margins ranging from *** to *** percent. Subject imports oversold domestic grade B *** in *** of 54 quarterly instances by margins ranging from *** to *** percent.

As shown in tables H-13 and H-14, prices for grade A CWP imported from Oman were below those for U.S.-produced product in *** instances and prices for grade B CWP from Oman were below those for U.S. produced product in ***; margins of underselling ranged from *** to *** percent for grade A CWP and *** to *** percent for grade B product. Prices for CWP imported from the UAE were below those for U.S.-produced grade A product in 76 of 78 instances, with margins of underselling ranging from *** to *** percent. In the other 2 instances, prices for grade A CWP from the UAE were between *** and *** percent above prices for the domestic product. Prices for CWP imported from the UAE were below those for U.S.-produced grade B product in 71 of 75 instances, with margins of underselling ranging from *** to *** percent. In the other 4 instances, prices for grade B CWP from the UAE were between *** percent and *** percent above prices for the domestic product.

Table H-1

CWP: Weighted-average f.o.b. prices and quantities of domestic and imported grade A product 1 and margins of underselling/(overselling), by source and quarter

Quantity in short tons; Prices in dollars per short ton; Margins in percent

Period	U.S. price	U.S. quantity	Oman price	Oman quantity	Oman margin	UAE price	UAE quantity	UAE margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
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: ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 2–4 inches inclusive.

Table H-2

CWP: Weighted-average f.o.b. prices and quantities of domestic and imported grade A product 2 and margins of underselling/(overselling), by source and quarter

Quantity in short tons; Prices in dollars per short ton; Margins in percent

Period	U.S. price	U.S. quantity	Oman price	Oman quantity	Oman margin	UAE price	UAE quantity	UAE margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
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: ASTM A53 schedule 40 galvanized plain-end, with nominal outside diameter of 2–4 inches inclusive.

Table H-3

CWP: Weighted-average f.o.b. prices and quantities of domestic and imported grade A product 3 and margins of underselling/(overselling), by source and quarter

Quantity in short tons; Prices in dollars per short ton; Margins in percent

Period	U.S. price	U.S. quantity	Oman price	Oman quantity	Oman margin	UAE price	UAE quantity	UAE margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
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: No domestic pricing data were provided for grade A product 3.

Note: Product 3: ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 6–8 inches inclusive.

Table H-4**CWP: Weighted-average f.o.b. prices and quantities of domestic and imported grade A product 4 and margins of underselling/(overselling), by source and quarter**

Quantity in short tons; Prices in dollars per short ton; Margins in percent

Period	U.S. price	U.S. quantity	Oman price	Oman quantity	Oman margin	UAE price	UAE quantity	UAE margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
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: No pricing data for grade A product 4 from Oman were provided.

Note: Product 4: ASTM A53 and/or F1083 schedule 40 galvanized fence tube, with nominal outside diameter of 1-1/4–3 inches, inclusive.

Table H-5

CWP: Weighted-average f.o.b. prices and quantities of domestic and imported grade B product 1 and margins of underselling/(overselling), by source and quarter

Quantity in short tons; Prices in dollars per short ton; Margins in percent

Period	U.S. price	U.S. quantity	Oman price	Oman quantity	Oman margin	UAE price	UAE quantity	UAE margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
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: ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 2–4 inches inclusive.

Table H-6

CWP: Weighted-average f.o.b. prices and quantities of domestic and imported grade B product 2 and margins of underselling/(overselling), by source and quarter

Quantity in short tons; Prices in dollars per short ton; Margins in percent

Period	U.S. price	U.S. quantity	Oman price	Oman quantity	Oman margin	UAE price	UAE quantity	UAE margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
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: No pricing data for grade B product 2 from Oman were provided.

Note: Product 2: ASTM A53 schedule 40 galvanized plain-end, with nominal outside diameter of 2–4 inches inclusive.

Table H-7

CWP: Weighted-average f.o.b. prices and quantities of domestic and imported grade B product 3 and margins of underselling/(overselling), by source and quarter

Quantity in short tons; Prices in dollars per short ton; Margins in percent

Period	U.S. price	U.S. quantity	Oman price	Oman quantity	Oman margin	UAE price	UAE quantity	UAE margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
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: ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 6–8 inches inclusive.

Table H-8

CWP: Weighted-average f.o.b. prices and quantities of domestic and imported grade B product 4 and margins of underselling/(overselling), by source and quarter

Quantity in short tons; Prices in dollars per short ton; Margins in percent

Period	U.S. price	U.S. quantity	Oman price	Oman quantity	Oman margin	UAE price	UAE quantity	UAE margin
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
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: No pricing data for grade B product 4 from the United States or Oman were provided.

Note: Product 4: ASTM A53 and/or F1083 schedule 40 galvanized fence tube, with nominal outside diameter of 1-1/4–3 inches, inclusive.

Figure H-1
CWP: Weighted-average prices and quantities of domestic and imported grade A product 1, by source and quarter

Price of grade A product 1

* * * * *

Volume of grade A product 1

* * * * *

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

Note: Product 1: ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 2–4 inches inclusive.

Figure H-2
CWP: Weighted-average prices and quantities of domestic and imported grade A product 2, by source and quarter

Price of grade A product 2

* * * * *

Volume of grade A product 2

* * * * *

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

Note: Product 2: ASTM A53 schedule 40 galvanized plain-end, with nominal outside diameter of 2–4 inches inclusive.

Figure H-3
CWP: Weighted-average prices and quantities of domestic and imported grade A product 3, by source and quarter

Price of grade A product 3

* * * * *

Volume of grade A product 3

* * * * *

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

Note: Product 3: ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 6–8 inches inclusive.

Figure H-4
CWP: Weighted-average prices and quantities of domestic and imported grade A product 4, by source and quarter

Price of grade A product 4

* * * * *

Volume of grade A product 4

* * * * *

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

Note: Product 4: ASTM A53 and/or F1083 schedule 40 galvanized fence tube, with nominal outside diameter of 1-1/4–3 inches, inclusive.

Figure H-5
CWP: Weighted-average prices and quantities of domestic and imported grade B product 1, by source and quarter

Price of grade B product 1

* * * * *

Volume of grade B product 1

* * * * *

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

Note: Product 1: ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 2–4 inches inclusive.

Figure H-6
CWP: Weighted-average prices and quantities of domestic and imported grade B product 2, by source and quarter

Price of grade B product 2

* * * * *

Volume of grade B product 2

* * * * *

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

Note: Product 2: ASTM A53 schedule 40 galvanized plain-end, with nominal outside diameter of 2–4 inches inclusive.

Figure H-7
CWP: Weighted-average prices and quantities of domestic and imported grade B product 3, by source and quarter

Price of grade B product 3

* * * * *

Volume of grade B product 3

* * * * *

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

Note: Product 3: ASTM A53 schedule 40 black plain-end, with nominal outside diameter of 6–8 inches inclusive.

Figure H-8
CWP: Weighted-average prices and quantities of domestic and imported grade B product 4, by source and quarter

Price of grade B product 4

* * * * *

Volume of grade B product 4

* * * * *

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

Note: Product 4: ASTM A53 and/or F1083 schedule 40 galvanized fence tube, with nominal outside diameter of 1-1/4–3 inches, inclusive.

Table H-9
CWP: Summary of price data for grade A, by pricing product and source, first quarter of 2016-
second quarter of 2022

Quantity in short tons; Price in dollars per short ton; Changes in percent

Product	Source	Number of quarters	Quantity	Low price	High price	First quarter price	Last quarter price	Percent change in price over period
Product 1	United States	***	***	***	***	***	***	***
Product 1	Oman	***	***	***	***	***	***	***
Product 1	Pakistan	***	***	***	***	***	***	***
Product 1	UAE	***	***	***	***	***	***	***
Product 2	United States	***	***	***	***	***	***	***
Product 2	Oman	***	***	***	***	***	***	***
Product 2	Pakistan	***	***	***	***	***	***	***
Product 2	UAE	***	***	***	***	***	***	***
Product 3	United States	***	***	***	***	***	***	***
Product 3	Oman	***	***	***	***	***	***	***
Product 3	Pakistan	***	***	***	***	***	***	***
Product 3	UAE	***	***	***	***	***	***	***
Product 4	United States	***	***	***	***	***	***	***
Product 4	Oman	***	***	***	***	***	***	***
Product 4	Pakistan	***	***	***	***	***	***	***
Product 4	UAE	***	***	***	***	***	***	***

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

Note: The percent change column is the percentage change from the first quarter of 2016 to the second quarter of 2022.

Table H-10

CWP: Summary of price data for grade B, by pricing product and source, first quarter of 2016- second quarter of 2022

Quantity in short tons; Price in dollars per short ton; Changes in percent

Product	Source	Number of quarters	Quantity	Low price	High price	First quarter price	Last quarter price	Percent change in price over period
Product 1	United States	***	***	***	***	***	***	***
Product 1	Oman	***	***	***	***	***	***	***
Product 1	Pakistan	***	***	***	***	***	***	***
Product 1	UAE	***	***	***	***	***	***	***
Product 2	United States	***	***	***	***	***	***	***
Product 2	Oman	***	***	***	***	***	***	***
Product 2	Pakistan	***	***	***	***	***	***	***
Product 2	UAE	***	***	***	***	***	***	***
Product 3	United States	***	***	***	***	***	***	***
Product 3	Oman	***	***	***	***	***	***	***
Product 3	Pakistan	***	***	***	***	***	***	***
Product 3	UAE	***	***	***	***	***	***	***
Product 4	United States	***	***	***	***	***	***	***
Product 4	Oman	***	***	***	***	***	***	***
Product 4	Pakistan	***	***	***	***	***	***	***
Product 4	UAE	***	***	***	***	***	***	***

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

Note: The percent change column is the percentage change from the first quarter of 2016 to the second quarter of 2022.

Table H-11**CWP: Instances of underselling and overselling of grade A product and the range and average of margins, by pricing product**

Quantity in short tons; Margins in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	***	***	***	***	***
Product 2	Underselling	***	***	***	***	***
Product 3	Underselling	***	***	***	***	***
Product 4	Underselling	***	***	***	***	***
Total, all products	Underselling	***	***	***	***	***
Product 1	Overselling	***	***	***	***	***
Product 2	Overselling	***	***	***	***	***
Product 3	Overselling	***	***	***	***	***
Product 4	Overselling	***	***	***	***	***
Total, all products	Overselling	***	***	***	***	***

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 H-12**CWP: Instances of underselling and overselling of grade B product and the range and average of margins, by pricing product**

Quantity in short tons; Margins in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	***	***	***	***	***
Product 2	Underselling	***	***	***	***	***
Product 3	Underselling	***	***	***	***	***
Product 4	Underselling	***	***	***	***	***
Total, all products	Underselling	***	***	***	***	***
Product 1	Overselling	***	***	***	***	***
Product 2	Overselling	***	***	***	***	***
Product 3	Overselling	***	***	***	***	***
Product 4	Overselling	***	***	***	***	***
Total, all products	Overselling	***	***	***	***	***

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 H-13**CWP: Instances of underselling and overselling of grade A product and the range and average of margins, by source**

Quantity in short tons; Margins in percent

Source	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Oman	Underselling	***	***	***	***	***
Pakistan	Underselling	***	***	***	***	***
UAE	Underselling	***	***	***	***	***
Total, all subject sources	Underselling	***	***	***	***	***
Oman	Overselling	***	***	***	***	***
Pakistan	Overselling	***	***	***	***	***
UAE	Overselling	***	***	***	***	***
Total, all subject sources	Overselling	***	***	***	***	***

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 H-14**CWP: Instances of underselling and overselling of grade B product and the range and average of margins, by source**

Quantity in short tons; Margins in percent

Source	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Oman	Underselling	***	***	***	***	***
Pakistan	Underselling	***	***	***	***	***
UAE	Underselling	***	***	***	***	***
Total, all subject sources	Underselling	***	***	***	***	***
Oman	Overselling	***	***	***	***	***
Pakistan	Overselling	***	***	***	***	***
UAE	Overselling	***	***	***	***	***
Total, all subject sources	Overselling	***	***	***	***	***

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.

