

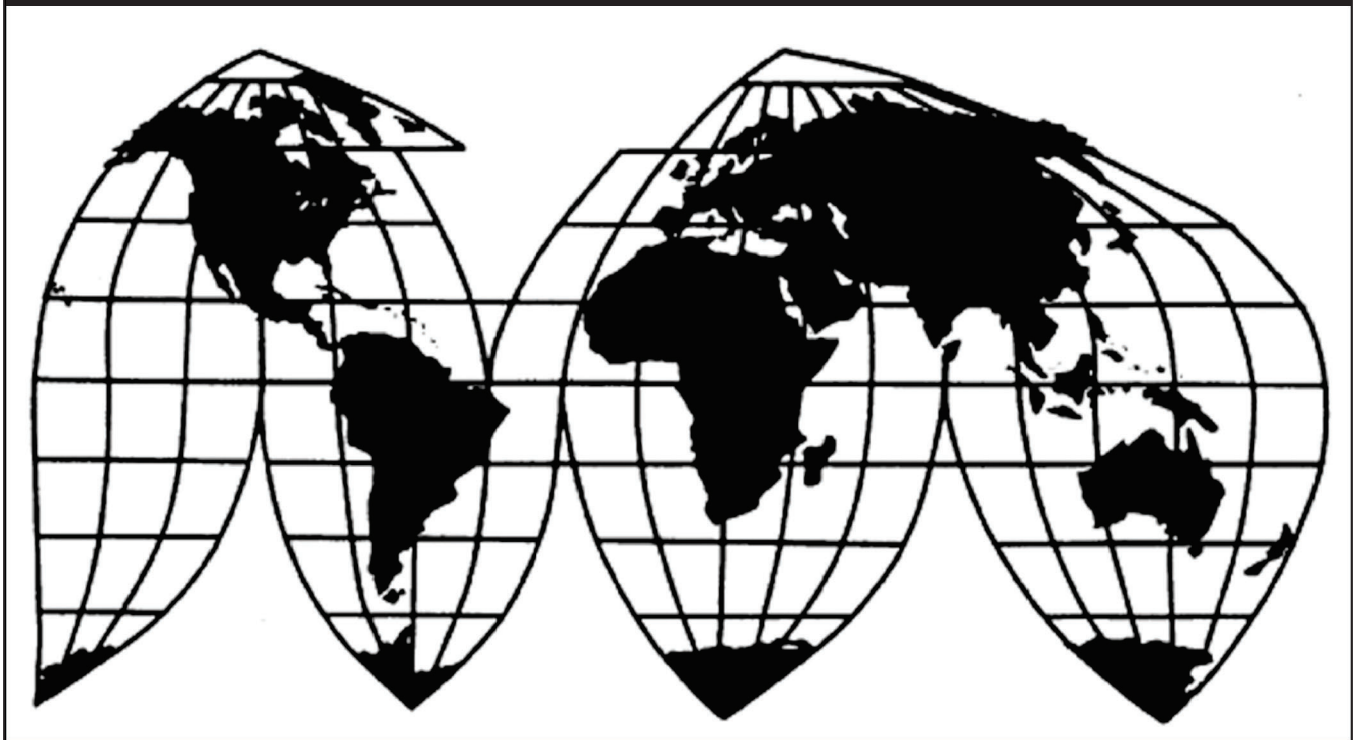
# **Boltless Steel Shelving Units Prepackaged for Sale from India, Malaysia, Taiwan, Thailand, and Vietnam**

Investigation Nos. 731-TA-1607-1611 (Preliminary)

**Publication 5434**

**June 2023**

**U.S. International Trade Commission**



Washington, DC 20436

# U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual concerns may not be published.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



## UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 731-TA-1607-1611 (Preliminary)

Boltless Steel Shelving Units Prepackaged for Sale from India, Malaysia, Taiwan, Thailand, and Vietnam

### DETERMINATIONS

On the basis of the record<sup>1</sup> developed in the subject investigations, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of boltless steel shelving units prepackaged for sale (“boltless steel shelving”) from Malaysia, Taiwan, Thailand, and Vietnam, and that there is a reasonable indication that an industry in the United States is threatened with material injury by reason of imports of boltless steel shelving from India, provided for in subheading 9403.20.00 of the Harmonized Tariff Schedule of the United States, that are alleged to be sold in the United States at less than fair value (“LTFV”).<sup>2</sup>

### COMMENCEMENT OF FINAL PHASE INVESTIGATIONS

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

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

<sup>2</sup> 88 FR 32188 (May 19, 2023).

who are parties to the investigations.

## **BACKGROUND**

On April 25, 2023, Edsal Manufacturing Co., Inc., Chicago, Illinois, filed petitions with the Commission and Commerce, alleging that an industry in the United States is materially injured or threatened with material injury by reason of LTFV imports of boltless steel shelving from India, Malaysia, Taiwan, Thailand, and Vietnam. Accordingly, effective April 25, 2023, the Commission instituted antidumping duty investigation nos. 731-TA-1607-1611 (Preliminary).

Notice of the institution of the Commission's investigations and of a public conference to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* of May 2, 2023 (88 FR 27529). The Commission gave notice that it would hold its staff conference via video conference in a notice published in the *Federal Register* of May 3, 2023 (88 FR 27923). The Commission conducted its conference on May 16, 2023. All persons who requested the opportunity were permitted to participate.

## **Views of the Commission**

Based on the record in the preliminary phase of these investigations, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of boltless steel shelving units prepackaged for sale (“boltless steel shelving”) from Malaysia, Taiwan, Thailand, and Vietnam that are allegedly sold in the United States at less than fair value. We also determine that there is a reasonable indication that an industry in the United States is threatened with material injury by reason of imports of boltless steel shelving from India that are allegedly sold in the United States at less than fair value.

### **I. The Legal Standard for Preliminary Determinations**

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

### **II. Background**

Edsal Manufacturing Co., Inc. (“Petitioner” or “Edsal”), a domestic producer of boltless steel shelving, filed the petitions in these investigations on April 25, 2023. Petitioner appeared at the staff conference and submitted a postconference brief.<sup>3</sup>

Several respondent entities participated in these investigations. Triune Technofab Private Limited (“Triune”), a producer and exporter of boltless steel shelving in India, appeared at the conference and submitted a postconference brief on behalf of itself and JS Products, Inc.,

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

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

<sup>3</sup> The Commission conducted its staff conference by videoconference and written witness testimony as set forth in the procedures provided to the parties.

a firm that sources boltless steel shelving on behalf of its retail customer (collectively, “Respondents”).<sup>4</sup> In addition, Jaken Co. (“Jaken”), which is an importer of subject merchandise from \*\*\*<sup>5</sup> and allegedly a producer of subject merchandise in Malaysia and Vietnam,<sup>6</sup> filed a postconference statement.

**Data Coverage.** Except as noted, U.S. industry data are based on questionnaire responses of two firms that accounted for all U.S. production of boltless steel shelving during 2022.<sup>7</sup> U.S. imports are based on the questionnaire responses of 11 importers that accounted for the following percentages of total imports from each subject country as reported in official import statistics: \*\*\* percent of U.S. imports from India; \*\*\* percent of U.S. imports from Malaysia; \*\*\* percent of U.S. imports from Taiwan; \*\*\* percent of U.S. imports from Thailand; \*\*\* percent of U.S. imports from Vietnam; and \*\*\* percent of U.S. imports from nonsubject sources.<sup>8</sup> The Commission received usable responses to its questionnaires from several foreign producers of subject merchandise, including one foreign producer of subject merchandise in India, accounting for \*\*\* percent of reported production of subject merchandise in India in 2022;<sup>9</sup> one foreign producer of subject merchandise in Taiwan, accounting for \*\*\* percent of reported production of subject merchandise in Taiwan in 2022;<sup>10</sup> one foreign producer of subject merchandise in Thailand, accounting for \*\*\* percent of reported production of subject merchandise in Thailand in 2022;<sup>11</sup> and two foreign producers of subject merchandise in Vietnam, accounting for \*\*\* percent of reported production of subject merchandise in Vietnam in 2022.<sup>12</sup> The Commission did not receive questionnaire responses from foreign producers of subject merchandise in Malaysia.<sup>13</sup>

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<sup>4</sup> JS Products does not itself produce or import subject merchandise, but it sources products from Triune on behalf of its retailer customer, \*\*\*. Respondents Postconference Br. at 15, Responses to Staff Questions at 6-7.

<sup>5</sup> Confidential Staff Report, INV-VV-046 (June 2, 2023), as revised by INV-VV-050 (June 6, 2023) (“CR”); *Boltless Steel Shelving Units Prepackaged for Sale from India, Malaysia, Taiwan, Thailand, and Vietnam*: Inv. Nos. 1607-1611 (Prelim.), USITC Pub. 5434 (June 2023) (“PR”) at Table IV-1.

<sup>6</sup> Jaken Postconference Statement at 1, 3.

<sup>7</sup> CR/PR at I-4.

<sup>8</sup> CR/PR at I-4. As discussed below in Section V, official import statistics appear to contain some out-of-scope merchandise.

<sup>9</sup> CR/PR at VII-3.

<sup>10</sup> CR/PR at VII-12.

<sup>11</sup> CR/PR at VII-17.

<sup>12</sup> CR/PR at VII-22.

<sup>13</sup> CR/PR at VII-10.

### III. Domestic Like Product

In determining whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of imports of the subject merchandise, the Commission first defines the “domestic like product” and the “industry.”<sup>14</sup> Section 771(4)(A) of the Tariff Act of 1930, as amended (“the Tariff Act”), defines the relevant domestic industry as the “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”<sup>15</sup> In turn, the Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation.”<sup>16</sup>

By statute, the Commission’s “domestic like product” analysis begins with the “article subject to an investigation,” *i.e.*, the subject merchandise as determined by Commerce.<sup>17</sup> Therefore, Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value is “necessarily the starting point of the Commission’s like product analysis.”<sup>18</sup> The Commission then defines the domestic like product in light of the imported articles Commerce has identified.<sup>19</sup> The decision regarding the appropriate domestic like product(s) in an investigation is a factual determination, and the Commission has applied the statutory standard of “like” or “most similar in characteristics and

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<sup>14</sup> 19 U.S.C. § 1677(4)(A).

<sup>15</sup> 19 U.S.C. § 1677(4)(A).

<sup>16</sup> 19 U.S.C. § 1677(10).

<sup>17</sup> 19 U.S.C. § 1677(10). The Commission must accept Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value. *See, e.g., USEC, Inc. v. United States*, 34 Fed. App’x 725, 730 (Fed. Cir. 2002) (“The ITC may not modify the class or kind of imported merchandise examined by Commerce.”); *Algoma Steel Corp. v. United States*, 688 F. Supp. 639, 644 (Ct. Int’l Trade 1988), *aff’d*, 865 F.3d 240 (Fed. Cir.), *cert. denied*, 492 U.S. 919 (1989).

<sup>18</sup> *Cleo Inc. v. United States*, 501 F.3d 1291, 1298 (Fed. Cir. 2007); *see also Hitachi Metals, Ltd. v. United States*, Case No. 19-1289, slip op. at 8-9 (Fed. Cir. Feb. 7, 2020) (the statute requires the Commission to start with Commerce’s subject merchandise in reaching its own like product determination).

<sup>19</sup> *Cleo*, 501 F.3d at 1298 n.1 (“Commerce’s {scope} finding does not control the Commission’s {like product} determination.”); *Hosiden Corp. v. Advanced Display Mfrs.*, 85 F.3d 1561, 1568 (Fed. Cir. 1996) (the Commission may find a single like product corresponding to several different classes or kinds defined by Commerce); *Torrington Co. v. United States*, 747 F. Supp. 744, 748–52 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (affirming the Commission’s determination defining six like products in investigations where Commerce found five classes or kinds).

uses” on a case-by-case basis.<sup>20</sup> No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.<sup>21</sup> The Commission looks for clear dividing lines among possible like products and disregards minor variations.<sup>22</sup> The Commission may, where appropriate, include domestic articles in the domestic like product in addition to those described in the scope.<sup>23</sup>

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

The scope of these investigations covers boltless steel shelving units prepackaged for sale, with or without decks (boltless steel shelving). The term “prepackaged for sale” means that, at a minimum, the steel vertical supports (i.e., uprights and posts) and steel horizontal supports (i.e., beams, braces) necessary to assemble a completed shelving unit (with or without decks) are packaged together for ultimate purchase by the end-user. The scope also includes add-on kits. Add-on kits include, but are not limited to, kits that allow the end-user to add an extension shelving unit onto an existing boltless steel shelving unit such that the extension and the original unit will share common frame elements (e.g., two posts). The term “boltless” refers to steel

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<sup>20</sup> See, e.g., *Cleo*, 501 F.3d at 1299; *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Torrington Co. v. United States*, 747 F. Supp. 744, 749 n.3 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (“every like product determination ‘must be made on the particular record at issue’ and the ‘unique facts of each case’”). The Commission generally considers a number of factors including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. See *Nippon*, 19 CIT at 455 n.4; *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996).

<sup>21</sup> See, e.g., S. Rep. No. 96-249 at 90-91 (1979).

<sup>22</sup> See, e.g., *Nippon*, 19 CIT at 455; *Torrington*, 747 F. Supp. at 748-49; see also S. Rep. No. 96-249 at 90-91 (Congress has indicated that the like product standard should not be interpreted in “such a narrow fashion as to permit minor differences in physical characteristics or uses to lead to the conclusion that the product and article are not ‘like’ each other, nor should the definition of ‘like product’ be interpreted in such a fashion as to prevent consideration of an industry adversely affected by the imports under consideration.”).

<sup>23</sup> See, e.g., *Pure Magnesium from China and Israel*, Inv. Nos. 701-TA-403 and 731-TA-895-96 (Final), USITC Pub. 3467 at 8 n.34 (Nov. 2001); *Torrington*, 747 F. Supp. at 748-49 (holding that the Commission is not legally required to limit the domestic like product to the product advocated by the petitioner, co-extensive with the scope).

shelving in which the vertical and horizontal supports forming the frame are assembled primarily without the use of nuts and bolts, or screws. The vertical and horizontal support members for boltless steel shelving are assembled by methods such as, but not limited to, fitting a rivet, punched or cut tab, or other similar connector on one support into a hole, slot or similar receptacle on another support. The supports lock together to form the frame for the shelving unit, and provide the structural integrity of the shelving unit separate from the inclusion of any decking. The incidental use of nuts and bolts, or screws to add accessories, wall anchors, tie-bars or shelf supports does not remove the product from scope. Boltless steel shelving units may also come packaged as partially assembled, such as when two upright supports are welded together with front-to-back supports, or are otherwise connected, to form an end unit for the frame. The boltless steel shelving covered by these investigations may be commonly described as rivet shelving, welded frame shelving, slot and tab shelving, and punched rivet (quasi-rivet) shelving as well as by other trade names. The term “deck” refers to the shelf that sits on or fits into the horizontal supports (beams or braces) to provide the horizontal storage surface of the shelving unit.

The scope includes all boltless steel shelving meeting the description above, regardless of: (1) vertical support or post type (including but not limited to open post, closed post and tubing); (2) horizontal support or beam/brace profile (including but not limited to Z-beam, C-beam, L-beam, step beam and cargo rack); (3) number of supports; (4) surface coating (including but not limited to paint, epoxy, powder coating, zinc and other metallic coating); (5) number of levels; (6) weight capacity; (7) shape (including but not limited to rectangular, square, and corner units); (8) decking material (including but not limited to wire decking, particle board, laminated board or no deck at all); or (9) the boltless method by which vertical and horizontal supports connect (including but not limited to keyhole and rivet, slot and tab, welded frame, punched rivet and clip).

Specifically excluded from the scope are:

- Wall-mounted shelving, defined as shelving that is hung on the wall and does not stand on, or transfer load to, the floor. The addition of a wall bracket or other device to attach otherwise freestanding subject merchandise to a wall does not meet the terms of this exclusion;
- Wire shelving units, which consist of shelves made from wire that incorporates both a wire deck and wire horizontal supports (taking the place of the horizontal beams and braces) into a single piece with tubular collars that slide over the posts and onto plastic sleeves snapped on the posts to create the finished shelving unit;
- Bulk-packed parts or components of boltless steel shelving units; and
- Made-to-order shelving systems.<sup>24</sup>

Boltless steel shelving is relatively high load-capacity, stand-alone shelving that may be assembled with no or minimal tools. Boltless steel shelving provides a sturdy frame for functional, non-aesthetic storage in garages, basements, and similar locations. Since boltless steel shelving is prepackaged, the end user may purchase the unit at home improvement stores or mass-merchandise retailers, handle the product, and transport the unit to its ultimate location.<sup>25</sup>

Boltless steel shelving is manufactured using hot rolled, flat-rolled carbon steel, slit to widths for producing horizontal beam, brace, and vertical post profiles. The slit steel blanks are then punched with notch holes and cut to length, formed to the final shapes and profiles, and packaged together with component pieces for sale as a complete shelving unit.<sup>26</sup>

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<sup>24</sup> *Boltless Steel Shelving Units Prepackaged for Sale From India, Malaysia, Taiwan, Thailand and the Socialist Republic of Vietnam: Initiation of Less-Than-Fair-Value Investigations*, 88 Fed. Reg. 32188 (May 19, 2023).

<sup>25</sup> CR/PR at I-8 – I-9.

<sup>26</sup> CR/PR at I-12 – I-13.



## **A. Arguments of the Parties**

*Petitioner's Argument.* Petitioner argues that the Commission should define a single domestic like product coextensive with the scope of these investigations.<sup>27</sup> It asserts that the scope is the same as the scope in the Commission's previous investigation of boltless steel shelving from China in which the Commission defined a single domestic like product coextensive with the scope and that there have been no changes to the product or market that would warrant a different result in these investigations.<sup>28</sup>

*Respondents' Argument.* Respondents do not raise any arguments regarding the definition of the domestic like product for purposes of the preliminary phase of these investigations.<sup>29</sup>

## **B. Analysis and Conclusion**

Based on the record, we define a single domestic like product consisting of boltless steel shelving.

*Physical Characteristics and Uses.* All boltless steel shelving units are made from steel and prepackaged for sale consisting of three basic components: vertical posts with pre-made holes or slots; horizontal beams or braces that fit into built-in receptacles in the post without nuts, bolts, or screws to form a strong, stable steel frame; and sometimes decking or shelving.<sup>30</sup> These units are all designed for end-user convenience through use of the boltless system, which eliminates the need for tools, and sold as a prepackaged unit, containing all the vertical and horizontal components required.<sup>31</sup> The majority of boltless steel shelving is produced within several common sizes.<sup>32</sup> The units may be sold with or without decking or shelving, which is typically made from particle board, other composite materials, or steel wire mesh.<sup>33</sup>

All forms of boltless steel shelving are convenient, easy-to-assemble consumer products that are constructed from steel and designed for functional utility and durability rather than

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<sup>27</sup> Petitioner Postconference Br. at 3-5; Petitions at 15-17.

<sup>28</sup> Petitioner Postconference Br. at 3-5; Petitions at 15-17.

<sup>29</sup> Transcript of May 16, 2023 Staff Conference ("Conf. Tr.") at 105-6 (Neeley).

<sup>30</sup> CR/PR at I-7 – I-11. Some units may include a minimal number of bolts, *e.g.*, in support brackets (referred to as "anti-spreader bars"), but nevertheless are still considered by the industry as boltless steel shelving. CR/PR at I-8 n.17; Conf. Tr. at 85 (Krugger); Petitioner Postconference Br., Exhibit 1 at 12.

<sup>31</sup> CR/PR at I-8 – I-9.

<sup>32</sup> CR/PR at I-9.

<sup>33</sup> CR/PR at I-9, I-11.

aesthetic appearance.<sup>34</sup> In contrast, wood shelving is designed for pleasing aesthetics and used to display items.<sup>35</sup> Wood shelving also does not provide the weight performance functionality and durability that boltless steel shelving provides.<sup>36</sup>

*Manufacturing Facilities, Production Processes and Employees.* There are six major steps used to manufacture boltless steel shelving: 1) hot-rolled, flat carbon steel is slit to widths for producing horizontal beam, brace, and vertical post profiles; 2) the slit steel blanks are successively punched with notch holes and are cut to length; 3) they are then formed to the final shape and profile; 4) they are then painted or coated; 5) they are then attached with rivets or welded with supports; and 6) the component pieces are packaged together for sale as a complete shelving unit.<sup>37</sup> Both U.S. producers reported producing all boltless steel shelving in the same facilities using the same employees.<sup>38</sup>

Both U.S. producers also reported producing alternative products on the same equipment used to produce boltless steel shelving. Edsal reported producing \*\*\* in addition to boltless steel shelving, while Tennsco Corp. (“Tennsco”) reported producing \*\*\*.<sup>39</sup>

*Channels of Distribution.* The vast majority of domestically produced boltless steel shelving is sold directly to retailers, with sales to distributors accounting for a minimal share of U.S. shipments of the domestic like product.<sup>40</sup> According to Edsal, other types of shelving may be sold more to distributors.<sup>41</sup>

*Interchangeability.* All boltless steel shelving is designed for durability as well for the convenience of the end user in that it is prepackaged with all necessary components and designed for easy assembly with little to no tools.<sup>42</sup> Accordingly, it is not generally interchangeable with shelving that is sold as separate components, requiring tools and/or professional installation.<sup>43</sup> Nor is it interchangeable with wood shelving that is designed for

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<sup>34</sup> CR/PR at I-11; Conf. Tr. at 18 (White).

<sup>35</sup> CR/PR at I-11; Conf. Tr. at 18 (White).

<sup>36</sup> Conf. Tr. at 18 (White).

<sup>37</sup> CR/PR at I-12.

<sup>38</sup> CR/PR at I-13, III-4, III-10.

<sup>39</sup> CR/PR at III-7.

<sup>40</sup> CR/PR at Table II-3.

<sup>41</sup> Conf. Tr. at 19 (White).

<sup>42</sup> CR/PR at I-7 – I-9.

<sup>43</sup> Conf. Tr. at 18 (White).

aesthetics rather than durability, as wood shelving is generally used in public areas.<sup>44</sup> \*\*\* U.S. producers reported that there are no substitutes for boltless steel shelving.<sup>45</sup>

*Producer and Customer Perceptions.* As indicated above, \*\*\* U.S. producers report that there are no substitutes for boltless steel shelving. According to Edsal, customers do not perceive other types of shelving products such as wood shelving, parts sold individually for assembly into shelving, or shelving products requiring tools, nuts and bolts, and fasteners to be reasonable substitutes for boltless steel shelving.<sup>46</sup>

*Price.* The price of different boltless steel shelving products falls within a range depending on the product's features and size. According to Petitioner, boltless steel shelving is generally priced lower than wood shelving, higher than resin shelving, and similarly to wire shelving.<sup>47</sup>

*Conclusion.* The record in the preliminary phase of these investigations indicates that all boltless steel shelving products share the same physical characteristics, end uses, and manufacturing facilities, processes, and employees, and are sold predominantly within the same channels of distribution. The record also indicates that there are clear dividing lines between boltless steel shelving and other types of shelving, including wood shelving and shelving requiring tools for assembly. Specifically, although there may be some overlap in terms of manufacturing facilities, channels of distribution, and price, there are clear differences in terms of physical characteristics and end uses between boltless steel shelving and other types of shelving, and domestic producers and customers view boltless steel shelving to be distinct products that are not readily interchangeable with other types of shelving. Accordingly, based on the foregoing, and in the absence of any contrary argument, we define a single domestic like product consisting of all boltless steel shelving, coextensive with the scope.<sup>48</sup>

#### **IV. Domestic Industry**

The domestic industry is defined as the domestic “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes

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<sup>44</sup> Conf. Tr. at 18 (White).

<sup>45</sup> CR/PR at II-10.

<sup>46</sup> Conf. Tr. at 18 (White).

<sup>47</sup> Conf. Tr. at 18 (White); Petitioner Postconference Br. at 4; Petitions at 16.

<sup>48</sup> To the extent that any party desires to argue for a different definition of the domestic like product in any final phase of these investigations, it must make requests for collecting such information in its comments on questionnaires. 19 C.F.R. § 207.20(b).

a major proportion of the total domestic production of the product.”<sup>49</sup> In defining the domestic industry, the Commission’s general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

These investigations raise the issue of whether appropriate circumstances exist to exclude any domestic producers from the domestic industry pursuant to Section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.<sup>50</sup> Exclusion of such a producer is within the Commission’s discretion based upon the facts presented in each investigation.<sup>51</sup>

The record indicates that Edsal qualifies for possible exclusion pursuant to the related parties provision because it imported subject merchandise during the period of investigation.<sup>52</sup> Petitioner argues that neither of the two domestic producers of boltless steel shelving should be excluded from the domestic industry.<sup>53</sup> Accordingly, Petitioner asserts that the Commission should define the domestic industry as consisting of all U.S. producers of the domestic like product.<sup>54</sup>

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<sup>49</sup> 19 U.S.C. § 1677(4)(A).

<sup>50</sup> See *Torrington Co. v. United States*, 790 F. Supp. 1161, 1168 (Ct. Int’l Trade 1992), *aff’d without opinion*, 991 F.2d 809 (Fed. Cir. 1993); *Sandvik AB v. United States*, 721 F. Supp. 1322, 1331-32 (Ct. Int’l Trade 1989), *aff’d mem.*, 904 F.2d 46 (Fed. Cir. 1990); *Empire Plow Co. v. United States*, 675 F. Supp. 1348, 1352 (Ct. Int’l Trade 1987).

<sup>51</sup> The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

- (1) the percentage of domestic production attributable to the importing producer;
- (2) the reason the U.S. producer has decided to import the product subject to investigation (whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market);
- (3) whether inclusion or exclusion of the related party will skew the data for the rest of the industry;
- (4) the ratio of import shipments to U.S. production for the imported product; and
- (5) whether the primary interest of the importing producer lies in domestic production or importation. *Changzhou Trina Solar Energy Co. v. USITC*, 100 F. Supp.3d 1314, 1326-31 (Ct. Int’l. Trade 2015), *aff’d*, 839 F.3d 1377 (Fed. Cir. 2018); see also *Torrington Co. v. United States*, 790 F. Supp. at 1168.

<sup>52</sup> CR/PR at III-9.

<sup>53</sup> Petitioner Postconference Br. at 5-6.

<sup>54</sup> Petitioner Postconference Br. at 6. Respondents did not argue for a different definition of the domestic industry.

Edsal is the petitioner and largest U.S. producer of boltless steel shelving, accounting for \*\*\* percent of domestic production in 2022.<sup>55</sup> During the period of investigation, it imported subject merchandise from \*\*\*.<sup>56</sup> The ratio of Edsal's total subject imports to its domestic production was \*\*\* percent in 2020, and \*\*\* percent in 2021 and 2022.<sup>57</sup> Edsal claims that it imported subject merchandise "purely as a defensive measure" to meet customers' demand for low priced products.<sup>58</sup>

In view of the fact that Edsal is the petitioner and accounted for \*\*\* domestic production of boltless steel shelving, with imports of subject merchandise that were \*\*\* small in relation to its domestic production, we find that appropriate circumstances do not exist to exclude Edsal from the domestic industry pursuant to the related parties provision.

Accordingly, based on our definition of the domestic like product, we define the domestic industry to include all domestic producers of boltless steel shelving.

## **V. Negligible Imports**

Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product that account for less than 3 percent of all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition shall be deemed negligible.<sup>59</sup>

### **A. Arguments of the Parties**

*Petitioner's Argument.* Petitioner argues imports from each subject source exceed, or will imminently exceed, the negligibility threshold.<sup>60</sup> With respect to subject imports from India, Petitioner asserts that, even if the Commission were to find that subject imports from

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<sup>55</sup> CR/PR at Table III-1.

<sup>56</sup> CR/PR at Table III-11.

<sup>57</sup> CR/PR at Table III-11. Edsal imported from \*\*\* units in 2020 and \*\*\* units in 2021. The ratio of these imports to Edsal's domestic production was \*\*\* percent in both years. Edsal imported \*\*\* units from \*\*\* in 2022, which was the equivalent of \*\*\* percent of its domestic production that year. *Id.* It imported \*\*\* units from \*\*\* in 2020, which was the equivalent of \*\*\* percent of its domestic production that year, and it imported \*\*\* units from \*\*\* in 2021, which was the equivalent of \*\*\* percent of its domestic production that year. *Id.*

<sup>58</sup> Petitioner Postconference Br. at 6, Conf. Tr. at 20 (White); *see also* CR/PR at Table III-12.

<sup>59</sup> 19 U.S.C. §§ 1671b(a), 1673b(a), 1677(24)(A)(i), 1677(24)(B); *see also* 15 C.F.R. § 2013.1 (developing countries for purposes of 19 U.S.C. § 1677(36)).

<sup>60</sup> Petitioner Postconference Br. at 13-21.

India were not above the negligibility threshold for purposes of its present injury analysis, there is “ample evidence” indicating that they will imminently exceed the three percent threshold.<sup>61</sup>

*Respondents’ Argument.* Respondents argue that the record in the preliminary phase of these investigations show that subject imports from India were below the negligibility threshold during the twelve-month period preceding the filing of the petitions.<sup>62</sup> They further argue that the evidence demonstrates that subject imports from India will not imminently exceed the negligibility threshold for purposes of any threat analysis, due to Triune’s limited capacity and increasing focus on out-of-scope products, and the limited nature of its business with \*\*\*.<sup>63</sup>

## **B. Analysis and Conclusion**

During the most recent 12-month period preceding the filing of the petitions in these investigations (April 2022 through March 2023), based on questionnaire data, subject imports from India accounted for \*\*\* percent of total boltless steel shelving imports,<sup>64</sup> subject imports from Malaysia accounted for \*\*\* percent of total imports, subject imports from Taiwan accounted for \*\*\* percent of total imports, subject imports from Thailand accounted for \*\*\* percent of total imports, and subject imports from Vietnam accounted for \*\*\* percent of total imports.<sup>65</sup> Because imports from Malaysia, Taiwan, Thailand, and Vietnam exceed the three percent negligibility threshold applicable to antidumping duty investigations, we find that imports from each of these countries are not negligible. Because imports from India are below the negligibility threshold, however, we find that such imports are negligible for purposes of the Commission’s analysis of present material injury.

We next consider whether subject imports from India have the potential imminently to exceed the three percent negligibility threshold for purposes of determining threat of material injury. Under the relevant *American Lamb* standard, the record in the preliminary phase of these investigations does not provide clear and convincing evidence that there is not a potential

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<sup>61</sup> Petitioner Postconference Br. at 17-21 & Exhibits 1, 7; Conf. Tr. at 9 (Strong), 107-8 (Nagarajan), 118-19 (Miranda).

<sup>62</sup> Respondents Postconference Br. at 1-5.

<sup>63</sup> Respondents Postconference Br. at 12-16 & Exhibit 2.

<sup>64</sup> We find that questionnaire data are the best information available on the record of the preliminary phase of the investigations concerning import volumes because official import statistics appear to include out-of-scope merchandise. Both Petitioners and Respondents argue that the official import statistics include out-of-scope merchandise and staff received confirmation from an importer that it imported \*\*\*. Petitioner Postconference Br. at 13-16; Respondents Postconference Br. at 5-8; CR/PR at I-4 & n.7, IV-1. We observe that official import statistics show that subject imports from India accounted for \*\*\* percent of total imports during the negligibility period. CR/PR at Table IV-4.

<sup>65</sup> CR/PR at Table IV-4.

for subject imports from India to imminently exceed the negligibility threshold. First, as discussed above, subject imports from India accounted for \*\*\* percent of total imports during the April 2022 through March 2023 period, which approaches the three percent negligibility threshold. Additionally, as Respondents explained, subject imports from India were sought out and pulled into the U.S. market to supply a major retailer, \*\*\*, and Triune was able to \*\*\*.<sup>66</sup> The record shows that \*\*\*.<sup>67</sup> This demonstrates that subject imports from India have the potential to increase within a short time period to meet customer demand in the United States.

Moreover, the volume of arranged subject imports from India for the first quarter of 2023 accounted for \*\*\* percent of total arranged imports.<sup>68</sup> Although the volume of arranged subject imports from India declined after the first quarter of 2023, other record evidence indicates that the volume of subject imports from India could imminently increase beyond these previously arranged volumes. As noted, Triune was able to \*\*\*. According to Petitioner, \*\*\*, which could result in additional orders for boltless steel shelving imported from India within the imminent future.<sup>69</sup> Given that \*\*\*, we find it possible that \*\*\* will result in additional orders for Triune and increased subject imports from India in the imminent future.<sup>70</sup>

Given the evidence discussed above, we disagree with Respondents that there is clear and convincing evidence on the record that subject imports from India will remain negligible in the imminent future.<sup>71</sup> With respect to Respondents' argument that Triune has little capacity to produce additional volumes of boltless steel shelving due to high levels of capacity utilization and its focus on other products, we find the argument to be unpersuasive in light of Triune's demonstrated ability to establish and increase production in a relatively short timeframe, evidence that arranged subject imports from India exceeded \*\*\* percent of total arranged imports in the first quarter of 2023, and Triune's ability to shift production from out-of-scope products to boltless steel shelving to meet its customers' needs.<sup>72</sup> In light of Triune's overall

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<sup>66</sup> Respondents Postconference Br., Responses to Staff Questions at 7.

<sup>67</sup> CR/PR at Table VII-6.

<sup>68</sup> CR/PR at Table VII-34. We recognize that Petitioner contends that, based on its experience as a supplier to \*\*\*, the arranged import data are likely understated. Petitioner Postconference Br. at 18 & Exhibits 1, 7. We also note that the first quarter of 2023 is included in the negligibility period (April 2022 to March 2023) and these arranged import data thus indicate that subject imports from India may well have exceeded the negligibility threshold toward the end of the relevant period.

<sup>69</sup> Petitioner Postconference Br. at 10-11 & Exhibit 1 at para. 7. According to Petitioner, Edsal's products were subject to line reviews by major retailers that had the main purpose of having sellers of boltless steel shelving compete on price. CR/PR at VI-11 (citing Conf. Tr. at 25 (Kruger)).

<sup>70</sup> Respondents Postconference Br. at 8, 15, Responses to Staff Questions at 6-7.

<sup>71</sup> Respondents Postconference Br. at 1-3.

<sup>72</sup> Respondents Postconference Br. at 12-16, Responses to Staff Questions at 7-9, Exhibit 2.

practical capacity of \*\*\* units in 2022 and its demonstrated ability to operate at very high capacity utilization, Triune has the ability to increase its production of boltless steel shelving by up to \*\*\* percent over the level achieved in 2022 by shifting production from out-of-scope products to boltless steel shelving.<sup>73</sup>

We are also unpersuaded by Respondents' claim that the increase in subject imports from India that occurred during the period of investigation was "anomalous" and related to the "front loading" of such imports for purposes of building inventories, as allegedly reflected in the declining volume of arranged subject imports from India after the first quarter of 2023.<sup>74</sup> Contrary to Respondents' argument, subject imports from India did not begin at high levels before tapering off, as would be expected if they were "front loaded," but rather fluctuated during the period, reaching their highest levels in July 2022, October 2022, and December 2022.<sup>75</sup> These fluctuations in the volume of subject imports from India appear more consistent with the seasonality of demand, as discussed in Section VII.B.3 below, than with any "front loading" of subject import volumes.<sup>76</sup> Additionally, the volume of arranged imports normally declines from one quarter to the next, reflecting that orders for future delivery have yet to be placed.<sup>77</sup> As discussed above, \*\*\* that could result in additional orders for delivery within the imminent future.

For the above reasons, based on the record of the preliminary phase of the investigations, we find that the record does not contain clear and convincing evidence that there is not a potential that subject imports from India will imminently account for more than three percent of total imports of boltless steel shelving.<sup>78</sup> Accordingly, we find that there is a

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<sup>73</sup> CR/PR at Table VII-4. In 2022, Triune's practical boltless steel shelving capacity was \*\*\* units and its production was \*\*\* units, for capacity utilization at \*\*\* percent. *Id.* Its overall practical capacity was \*\*\* units and its production was \*\*\* units, for capacity utilization at \*\*\* percent. *Id.* Although Triune reported that its boltless steel shelving capacity is projected to decrease to \*\*\* units in 2023 and 2024, with projected production of \*\*\* units in both years, *id.* at Table VII-6, Triune's actual capacity and production of boltless steel shelving in those years will depend on \*\*\*.

<sup>74</sup> Respondents Postconference Br. at 13-16.

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

<sup>76</sup> CR/PR at Table IV-9.

<sup>77</sup> See CR/PR at Table VII-34.

<sup>78</sup> The volume of total imports of boltless steel shelving, based on questionnaire data, increased by \*\*\* percent from 2021 to 2022. CR/PR at Table IV-2. If total imports were to increase at the same rate from 2022 to 2023, the potential increase in subject imports from India from 2022 to 2023, discussed above, would be sufficient for such imports to exceed the negligibility threshold in 2023. The actual share of total imports represented by subject imports from India will depend on the outcome of \*\*\*, Triune's allocation of capacity to out-of-scope products, and the volume of total imports. We (Continued...)



potential that imports of boltless steel shelving from India subject to the antidumping duty investigation will imminently account for more than three percent of total imports and that such imports are therefore not negligible for purposes of our threat analysis in the preliminary phase of these investigations.<sup>79</sup>

## **VI. Cumulation**

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

- (1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality related questions;
- (2) the presence of sales or offers to sell in the same geographic markets of subject imports from different countries and the domestic like product;
- (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and
- (4) whether the subject imports are simultaneously present in the market.<sup>80</sup>

While no single factor is necessarily determinative, and the list of factors is not exclusive, these factors are intended to provide the Commission with a framework for

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intend to revisit our negligibility analysis of subject imports from India in any final phase of these investigations.

<sup>79</sup> In any final phase of these investigations, the parties are invited to submit comments on this issue and any supporting evidence onto the record.

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

determining whether the subject imports compete with each other and with the domestic like product.<sup>81</sup> Only a “reasonable overlap” of competition is required.<sup>82</sup>

#### **A. Arguments of the Parties**

*Petitioner’s Argument.* Petitioner argues that the Commission should cumulate subject imports from all subject sources for purposes of present material injury. It argues that the petitions were all filed on the same day, none of the statutory exceptions apply, and there is a reasonable overlap of competition.<sup>83</sup> According to Petitioner, subject imports from all countries are fungible with each other and the domestic like product.<sup>84</sup> Petitioner also claims that the domestic like product and subject imports are sold through the same channels of distribution and in overlapping geographic regions, and were simultaneously present in the U.S. market during the period of investigation.<sup>85</sup>

*Respondents’ Argument.* Respondents reiterate their argument that subject imports from India are negligible and therefore cannot be cumulated for purposes of the Commission’s analysis of present material injury; they take no position regarding whether imports from the other subject countries should be cumulated for purposes of present material injury.<sup>86</sup>

#### **B. Analysis and Conclusion**

As discussed above, we have found that subject imports from India are negligible for purposes of present material injury, and thus ineligible for cumulation. With respect to subject imports from Malaysia, Taiwan, Thailand, and Vietnam, the initial statutory requirement for cumulation is satisfied because petitioner filed the antidumping duty petitions with respect to all subject countries on the same day, April 25, 2023.<sup>87</sup> As discussed below, we find that there is a reasonable overlap of competition between subject imports from Malaysia, Taiwan,

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<sup>81</sup> See, e.g., *Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int’l Trade 1989).

<sup>82</sup> The Statement of Administrative Action (SAA) to the Uruguay Round Agreements Act (URAA), expressly states that “the new section will not affect current Commission practice under which the statutory requirement is satisfied if there is a reasonable overlap of competition.” H.R. Rep. No. 103-316, Vol. I at 848 (1994) (citing *Fundicao Tupy*, 678 F. Supp. at 902); see *Goss Graphic Sys., Inc. v. United States*, 33 F. Supp. 2d 1082, 1087 (Ct. Int’l Trade 1998) (“cumulation does not require two products to be highly fungible”); *Wieland Werke, AG*, 718 F. Supp. at 52 (“Completely overlapping markets are not required.”).

<sup>83</sup> Petitioner Postconference Br. at 21-22.

<sup>84</sup> Petitioner Postconference Br. at 22-23.

<sup>85</sup> Petitioner Postconference Br. at 24-25.

<sup>86</sup> Respondents Postconference Br., Responses to Staff Questions at 16.

<sup>87</sup> None of the statutory exceptions to cumulation applies.

Thailand, and Vietnam and between subject imports from each source and the domestic like product.

*Fungibility.* \*\*\* U.S. producers and importers reported that subject imports from Malaysia, Taiwan, Thailand, and Vietnam are always or frequently interchangeable with each other as well as the domestic like product.<sup>88</sup> Additionally, domestically produced boltless steel shelving and imports from these subject sources were sold in overlapping widths and weights in 2022.<sup>89</sup>

*Channels of Distribution.* Domestically produced boltless steel shelving and imports from Malaysia, Taiwan, Thailand, and Vietnam were sold in overlapping channels of distribution to retailers and distributors.<sup>90</sup>

*Geographic Overlap.* Domestically produced boltless steel shelving and imports from Malaysia, Thailand, and Vietnam were sold in overlapping geographic markets, with the domestic like product and subject imports from Vietnam reportedly being sold in \*\*\* geographic regions of the United States while imports from Malaysia and Thailand were reportedly sold in all regions of the United States except for “other” U.S. markets.<sup>91</sup> Although importers of subject merchandise from Taiwan did not report sales by geographic market, imports of boltless steel shelving from Taiwan entered the United States through all borders of entry in 2022, as did subject imports from Thailand and Vietnam, and imports from these three subject countries were concentrated at the eastern and western borders, as were subject imports from Malaysia.<sup>92</sup>

*Simultaneous Presence in Market.* Domestically produced boltless steel shelving and subject imports from Malaysia, Taiwan, Thailand, and Vietnam were simultaneously present throughout the period of investigation.<sup>93</sup>

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<sup>88</sup> CR/PR at Table II-11.

<sup>89</sup> CR/PR at Tables IV-6, IV-7.

<sup>90</sup> CR/PR at Table II-1. Domestic producers sold \*\*\*. Subject imports from Malaysia and Vietnam were sold \*\*\*. Subject imports from Taiwan were sold \*\*\*. Subject imports from Thailand were sold \*\*\*. *Id.*

<sup>91</sup> CR/PR at Table II-2.

<sup>92</sup> CR/PR at Tables II-2, IV-8. Subject imports from Malaysia entered through the eastern and western borders of entry. *Id.* at Table IV-8.

<sup>93</sup> CR/PR at Table IV-9 (showing imports from Taiwan, Thailand, and Vietnam were present in every month of the POI and imports from Malaysia were present every month of the POI except May 2020) and Tables V-4 – V-7 (showing domestically produced boltless steel shelving present in every quarter of the POI).

*Conclusion.* The record of the preliminary phase of the investigations indicates that subject imports from Malaysia, Taiwan, Thailand, and Vietnam are fungible with the domestic like product and each other. It also indicates that imports from each of the subject countries and the domestic like product were sold in overlapping channels of distribution and geographic markets and were simultaneously present in the U.S. market during the period of investigation. Because there appears to be a reasonable overlap of competition between and among imports from Malaysia, Taiwan, Thailand, and Vietnam and the domestic like product, we cumulate subject imports from these sources for purposes of our present material injury analysis.

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

### **A. Legal Standard**

In the preliminary phase of antidumping and countervailing duty investigations, the Commission determines whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.<sup>94</sup> In making this determination, the Commission must consider the volume of subject imports, their effect on prices for the domestic like product, and their impact on domestic producers of the domestic like product, but only in the context of U.S. production operations.<sup>95</sup> The statute defines “material injury” as “harm which is not inconsequential, immaterial, or unimportant.”<sup>96</sup> In assessing whether there is a reasonable indication that the domestic industry is materially injured by reason of subject imports, we consider all relevant economic factors that bear on the state of the industry in the United States.<sup>97</sup> No single factor is dispositive, and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”<sup>98</sup>

Although the statute requires the Commission to determine whether there is a reasonable indication that the domestic industry is “materially injured or threatened with material injury by reason of” unfairly traded imports,<sup>99</sup> it does not define the phrase “by reason of,” indicating that this aspect of the injury analysis is left to the Commission’s reasonable

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<sup>94</sup> 19 U.S.C. §§ 1671b(a), 1673b(a).

<sup>95</sup> 19 U.S.C. § 1677(7)(B). The Commission “may consider such other economic factors as are relevant to the determination” but shall “identify each {such} factor ... and explain in full its relevance to the determination.” 19 U.S.C. § 1677(7)(B).

<sup>96</sup> 19 U.S.C. § 1677(7)(A).

<sup>97</sup> 19 U.S.C. § 1677(7)(C)(iii).

<sup>98</sup> 19 U.S.C. § 1677(7)(C)(iii).

<sup>99</sup> 19 U.S.C. §§ 1671b(a), 1673b(a).

exercise of its discretion.<sup>100</sup> In identifying a causal link, if any, between subject imports and material injury to the domestic industry, the Commission examines the facts of record that relate to the significance of the volume and price effects of the subject imports and any impact of those imports on the condition of the domestic industry. This evaluation under the “by reason of” standard must ensure that subject imports are more than a minimal or tangential cause of injury and that there is a sufficient causal, not merely a temporal, nexus between subject imports and material injury.<sup>101</sup>

In many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry. Such economic factors might include nonsubject imports; changes in technology, demand, or consumer tastes; competition among domestic producers; or management decisions by domestic producers. The legislative history explains that the Commission must examine factors other than subject imports to ensure that it is not attributing injury from other factors to the subject imports, thereby inflating an otherwise tangential cause of injury into one that satisfies the statutory material injury threshold.<sup>102</sup> In performing its examination, however, the Commission need not isolate

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<sup>100</sup> *Angus Chemical Co. v. United States*, 140 F.3d 1478, 1484-85 (Fed. Cir. 1998) (“{T}he statute does not ‘compel the commissioners’ to employ {a particular methodology}.”), *aff’d*, 944 F. Supp. 943, 951 (Ct. Int’l Trade 1996).

<sup>101</sup> The Federal Circuit, in addressing the causation standard of the statute, observed that “{a}s long as its effects are not merely incidental, tangential, or trivial, the foreign product sold at less than fair value meets the causation requirement.” *Nippon Steel Corp. v. USITC*, 345 F.3d 1379, 1384 (Fed. Cir. 2003). This was further ratified in *Mittal Steel Point Lisas Ltd. v. United States*, 542 F.3d 867, 873 (Fed. Cir. 2008), where the Federal Circuit, quoting *Gerald Metals, Inc. v. United States*, 132 F.3d 716, 722 (Fed. Cir. 1997), stated that “this court requires evidence in the record ‘to show that the harm occurred ‘by reason of’ the LTFV imports, not by reason of a minimal or tangential contribution to material harm caused by LTFV goods.’” See also *Nippon Steel Corp. v. United States*, 458 F.3d 1345, 1357 (Fed. Cir. 2006); *Taiwan Semiconductor Industry Ass’n v. USITC*, 266 F.3d 1339, 1345 (Fed. Cir. 2001).

<sup>102</sup> SAA at 851-52 (“{T}he Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.”); S. Rep. 96-249 at 75 (1979) (the Commission “will consider information which indicates that harm is caused by factors other than less-than-fair-value imports.”); H.R. Rep. 96-317 at 47 (1979) (“in examining the overall injury being experienced by a domestic industry, the ITC will take into account evidence presented to it which demonstrates that the harm attributed by the petitioner to the subsidized or dumped imports is attributable to such other factors;” those factors include “the volume and prices of nonsubsidized imports or imports sold at fair value, contraction in demand or changes in patterns of consumption, trade restrictive practices of and competition between the foreign and domestic producers, developments in technology and the export performance and productivity of the domestic industry”); accord *Mittal Steel*, 542 F.3d at 877.

the injury caused by other factors from injury caused by unfairly traded imports.<sup>103</sup> Nor does the “by reason of” standard require that unfairly traded imports be the “principal” cause of injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry.<sup>104</sup> It is clear that the existence of injury caused by other factors does not compel a negative determination.<sup>105</sup>

Assessment of whether material injury to the domestic industry is “by reason of” subject imports “does not require the Commission to address the causation issue in any particular way” as long as “the injury to the domestic industry can reasonably be attributed to the subject imports.”<sup>106</sup> The Commission ensures that it has “evidence in the record” to “show that the harm occurred ‘by reason of’ the LTFV imports,” and that it is “not attributing injury from other

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<sup>103</sup> SAA at 851-52 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports.”); *Taiwan Semiconductor Industry Ass’n*, 266 F.3d at 1345 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports .... Rather, the Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.” (emphasis in original)); *Asociacion de Productores de Salmon y Trucha de Chile AG v. United States*, 180 F. Supp. 2d 1360, 1375 (Ct. Int’l Trade 2002) (“{t}he Commission is not required to isolate the effects of subject imports from other factors contributing to injury” or make “bright-line distinctions” between the effects of subject imports and other causes.); see also *Softwood Lumber from Canada*, Inv. Nos. 701-TA-414 and 731-TA-928 (Remand), USITC Pub. 3658 at 100-01 (Dec. 2003) (Commission recognized that “{i}f an alleged other factor is found not to have or threaten to have injurious effects to the domestic industry, i.e., it is not an ‘other causal factor,’ then there is nothing to further examine regarding attribution to injury”), citing *Gerald Metals*, 132 F.3d at 722 (the statute “does not suggest that an importer of LTFV goods can escape countervailing duties by finding some tangential or minor cause unrelated to the LTFV goods that contributed to the harmful effects on domestic market prices.”).

<sup>104</sup> S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

<sup>105</sup> See *Nippon Steel Corp.*, 345 F.3d at 1381 (“an affirmative material-injury determination under the statute requires no more than a substantial-factor showing. That is, the ‘dumping’ need not be the sole or principal cause of injury.”).

<sup>106</sup> *Mittal Steel*, 542 F.3d at 876, 878; see also *id.* at 873 (“While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured ‘by reason of’ subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology.”) citing *United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75. In its decision in *Swift-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission’s causation analysis as comporting with the Court’s guidance in *Mittal*.

sources to the subject imports.”<sup>107</sup> The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed “rigid adherence to a specific formula.”<sup>108</sup>

The question of whether the material injury threshold for subject imports is satisfied notwithstanding any injury from other factors is factual, subject to review under the substantial evidence standard.<sup>109</sup> Congress has delegated this factual finding to the Commission because of the agency’s institutional expertise in resolving injury issues.<sup>110</sup>

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

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

### **1. Demand Conditions**

Boltless steel shelving is a final good that is sold prepackaged in a kit, ready for assembly and installation by the consumer for storage use in areas such as basements, garages, laundry rooms, and similar locations.<sup>111</sup> Edsal asserts that demand for boltless steel shelving initially increased from 2020 to 2021 due to increased home improvement activity and clean-up efforts during the COVID-19 pandemic, before declining from 2021 to 2022.<sup>112</sup> \*\*\* reported that sales decreased in 2022.<sup>113</sup> Importers’ responses regarding demand trends in the U.S. market during the period of investigation were mixed. Four reported that demand fluctuated up, two reported no change, three reported that demand fluctuated down, and one reported that it steadily decreased.<sup>114</sup> Several importers also reported that demand for boltless steel shelving

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<sup>107</sup> *Mittal Steel*, 542 F.3d at 873 (quoting from *Gerald Metals*, 132 F.3d at 722), 877-79. We note that one relevant “other factor” may involve the presence of significant volumes of price-competitive nonsubject imports in the U.S. market, particularly when a commodity product is at issue. In appropriate cases, the Commission collects information regarding nonsubject imports and producers in nonsubject countries in order to conduct its analysis.

<sup>108</sup> *Nucor Corp. v. United States*, 414 F.3d 1331, 1336, 1341 (Fed. Cir. 2005); *see also Mittal Steel*, 542 F.3d at 879 (“*Bratsk* did not read into the antidumping statute a Procrustean formula for determining whether a domestic injury was ‘by reason’ of subject imports.”).

<sup>109</sup> We provide in our discussion below a full analysis of other factors alleged to have caused any material injury experienced by the domestic industry.

<sup>110</sup> *Mittal Steel*, 542 F.3d at 873; *Nippon Steel Corp.*, 458 F.3d at 1350, *citing U.S. Steel Group*, 96 F.3d at 1357; S. Rep. 96-249 at 75 (“The determination of the ITC with respect to causation is ... complex and difficult, and is a matter for the judgment of the ITC.”).

<sup>111</sup> CR/PR at II-8.

<sup>112</sup> Petitioner Postconference Br. at 7 (citing Conf. Tr. at 59-60 (White)); CR/PR at II-9 – II-10.

<sup>113</sup> CR/PR at II-8.

<sup>114</sup> CR/PR at Table II-4.

in the United States increased during the COVID-19 pandemic but subsequently decreased.<sup>115</sup> Respondents report that they do not anticipate an increase in demand for the boltless steel shelving products that they produce and anticipate that the demand will decline in 2023.<sup>116</sup>

Both U.S. producers and nine of 11 responding U.S. importers reported that the U.S. boltless steel shelving market is not subject to business cycles.<sup>117</sup> Nevertheless, Edsal claims that demand for boltless steel shelving is characterized to some degree by promotion-driven seasonality, with boltless steel shelving being promoted “aggressively” during periods coinciding with the July/August and December to February timeframes.<sup>118</sup> Similarly, two responding U.S. importers reported that demand for boltless steel shelving increases during particular times of the year when consumers seek to organize their homes, including the start of the year, post-holiday periods, three-day weekends, and fall/spring cleanup periods.<sup>119</sup> Respondents report that sales of boltless steel shelving increase significantly after the Christmas holiday season and that the product is heavily promoted in January.<sup>120</sup>

During the period of investigation, apparent U.S. consumption declined from \*\*\* units in 2020 to \*\*\* units in 2021 and \*\*\* units in 2022.<sup>121</sup>

## **2. Supply Conditions**

The domestic industry was the largest source of supply of boltless steel shelving to the U.S. market during the period of investigation, although its market share declined. The industry’s share of apparent U.S. consumption decreased \*\*\* percentage points between 2020 and 2022, declining from \*\*\* percent in 2020 to \*\*\* percent in 2021 and \*\*\* percent in 2022.<sup>122</sup> Edsal was the largest U.S. producer during the period of investigation, accounting for \*\*\* percent of domestic production of boltless steel shelving in 2022.<sup>123</sup>

Cumulated subject imports were the second largest source of boltless steel shelving in the U.S. market, gaining market share during the period of investigation. Cumulated subject imports’ share of apparent U.S. consumption increased \*\*\* percentage points between 2020 and 2022, increasing from \*\*\* percent in 2020 to \*\*\* percent in 2021 and \*\*\* percent in

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<sup>115</sup> CR/PR at II-20.

<sup>116</sup> Respondents Postconference Br. at 14.

<sup>117</sup> CR/PR at II-8.

<sup>118</sup> Petitioner Postconference Br. at 7 (citing Conf. Tr. at 59-60 (White)).

<sup>119</sup> CR/PR at II-9.

<sup>120</sup> Respondents Postconference Br., Responses to Staff Questions at 17.

<sup>121</sup> CR/PR at Table C-1.

<sup>122</sup> CR/PR at Tables IV-10, C-1.

<sup>123</sup> CR/PR at Table III-1.



2022.<sup>124</sup> Subject imports from India accounted for \*\*\* percent of apparent U.S. consumption in 2022.<sup>125</sup>

Nonsubject imports were the smallest source of boltless steel shelving in the U.S. market, accounting for less than \*\*\* percent throughout the period of investigation. Nonsubject imports as a share of apparent U.S. consumption increased from \*\*\* percent in 2020, to \*\*\* percent in 2021, and \*\*\* percent in 2022.<sup>126</sup> Based on official import statistics,<sup>127</sup> the largest sources of nonsubject imports during the period of investigation were China, Canada, and Slovakia.<sup>128</sup> Boltless steel shelving from China has been subject to antidumping and countervailing duty orders since 2015.<sup>129</sup> Effective May 10, 2019, nonsubject imports from China also became subject to an additional 25 percent ad valorem duty pursuant to Section 301 of the Trade Act of 1974, as amended.<sup>130</sup>

### **3. Substitutability and Other Conditions**

Based on the record in the preliminary phase of these investigations, we find that there is a moderate-to-high degree of substitutability between domestically produced boltless steel shelving and subject imports. As discussed above, U.S. producers and importers reported that the domestic like product and boltless steel shelving from all subject sources are always or frequently interchangeable.<sup>131</sup>

We also find that price is an important factor in purchasing decisions, among other important factors. Responding purchasers most frequently reported quality to be their top purchasing factor, with price most frequently cited as the second most important factor followed by availability.<sup>132</sup> Domestic producers reported that factors other than price are \*\*\*

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<sup>124</sup> CR/PR at Tables IV-10, C-1.

<sup>125</sup> CR/PR at Table C-1.

<sup>126</sup> CR/PR at Tables IV-10, C-1. This is based on official import statistics, which appear to contain some out-of-scope merchandise, as discussed in Section V above.

<sup>127</sup> As discussed in Section V above, official import statistics appear to contain some out-of-scope merchandise.

<sup>128</sup> CR/PR at II-8.

<sup>129</sup> CR/PR at I-4.

<sup>130</sup> CR/PR at I-7.

<sup>131</sup> CR/PR at Tables II-11, II-12.

<sup>132</sup> CR/PR at Table II-6.

significant while importers' responses regarding the significance of factors other than price were mixed.<sup>133</sup>

Boltless steel shelving is a consumer product that is generally sold by domestic producers and importers directly to major big box retailers or home improvement stores like the Home Depot, Lowe's, Costco, Menard's, Sam's Club, and Walmart.<sup>134</sup> Boltless steel shelving is also sold by online retailers like Amazon, HomeDepot.com, Lowe's.com, and hardware stores like Granger and Ace Hardware.<sup>135</sup> The five major purchasers of boltless steel shelving are \*\*\*.<sup>136</sup> In addition to being major purchasers, \*\*\* also directly imported subject merchandise.<sup>137</sup>

In February 2021, the Consumer Product Safety Commission ("CPSC") announced a voluntary recall by Edsal of four models of its boltless steel shelving \*\*\*.<sup>138</sup> Edsal reported that the recall resulted in \*\*\*.<sup>139</sup>

Boltless steel shelving is primarily made from hot-rolled steel, with decking typically made from particle board, other composite materials, or steel wire mesh.<sup>140</sup> Raw materials as a share of the domestic industry's cost of goods sold ("COGS") ranged from \*\*\* to \*\*\* percent during the period of investigation.<sup>141</sup> During the same period, prices for hot-rolled coil fluctuated but increased overall by \*\*\* percent.<sup>142</sup>

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<sup>133</sup> CR/PR at Tables II-13, II-14. Most importers reported that differences other than price were sometimes or never significant. However, one importer each reported that such differences were always significant in comparing the domestic like product versus subject imports from Malaysia, Taiwan, Thailand, and Vietnam. One importer each reported that such differences were frequently significant in comparing the domestic like product with subject imports from Malaysia, Thailand, and Vietnam, and one importer each reported that differences other than price were frequently significant when comparing subject imports from India versus Malaysia and from Thailand versus Vietnam. CR/PR at Table II-14.

<sup>134</sup> CR/PR at II-1, Table II-3.

<sup>135</sup> CR/PR at II-1.

<sup>136</sup> CR/PR at II-1.

<sup>137</sup> CR/PR at V-15.

<sup>138</sup> CR/PR at VI-14, Table III-3.

<sup>139</sup> CR/PR at VI-14.

<sup>140</sup> CR/PR at I-9, I-11, V-1.

<sup>141</sup> CR/PR at V-1.

<sup>142</sup> CR/PR at V-1.

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

Section 771(7)(C)(i) of the Tariff Act provides that the “Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant.”<sup>143</sup>

The volume of cumulated subject imports increased by \*\*\* percent during the period of investigation, increasing from \*\*\* units in 2020 to \*\*\* units in 2021 before decreasing to \*\*\* units in 2022.<sup>144</sup> Cumulated subject imports’ share of apparent U.S. consumption increased by \*\*\* percentage points during period of investigation, increasing from \*\*\* percent in 2020 to \*\*\* percent in 2021 and \*\*\* percent in 2022.<sup>145</sup>

Based on the record of the preliminary phase of the investigations, we conclude that the volume of cumulated subject imports and the increase in that volume are significant, both in absolute terms and relative to consumption.

### **D. Price Effects of the Subject Imports**

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

(I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and

(II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.<sup>146</sup>

As addressed in section VII.B.3. above, we have found a moderate-to-high degree of substitutability between subject imports and the domestic like product, and that price is an important factor in purchasing decisions, among other important factors.

We have examined several sources of data in our underselling analysis, including both pricing data and import purchase cost data. The Commission collected quarterly pricing data

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<sup>143</sup> 19 U.S.C. § 1677(7)(C)(i).

<sup>144</sup> CR/PR at Table IV-2. Importers’ U.S. shipments of subject imports, which are used to calculate apparent U.S. consumption, followed similar trends, increasing from \*\*\* units in 2020 to \*\*\* units in 2021 and declining to \*\*\* units in 2022. CR/PR at Table C-1.

<sup>145</sup> CR/PR at Tables IV-10, C-1.

<sup>146</sup> 19 U.S.C. § 1677(7)(C)(ii).

for the total quantity and f.o.b. value of four products shipped by U.S. producers and importers to unrelated customers during January 2020 through March 2023.<sup>147</sup> Both U.S. producers and five importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.<sup>148</sup> Pricing data reported by these firms accounted for approximately \*\*\* percent of overall U.S. producers' U.S. shipments of boltless steel shelving, \*\*\* percent of U.S. shipments of subject imports from Malaysia in 2022, \*\*\* percent of U.S. shipments of subject imports from Thailand, and \*\*\* percent of U.S. shipments of subject imports from Vietnam.<sup>149</sup>

The pricing data show underselling by cumulated subject imports, with most reported subject import sales volume in quarters of underselling. Cumulated subject imports undersold the domestic like product in 52 of 61 (or 85.2 percent of) quarterly comparisons, at margins ranging between \*\*\* and \*\*\* percent and averaging \*\*\* percent.<sup>150</sup> Cumulated subject imports oversold the domestic like product in the remaining nine (or 14.8 percent of) quarterly comparisons, at margins ranging between \*\*\* and \*\*\* percent and averaging \*\*\* percent.<sup>151</sup> The price comparison data also show predominant underselling by volume. Quarters in which there was underselling accounted for \*\*\* percent of reported cumulated subject import sales volume (\*\*\* units), and quarters in which there was overselling accounted for \*\*\* percent of reported of subject import sales volume (\*\*\* units).<sup>152</sup>

The Commission also collected import purchase cost data for the same four pricing products from firms that imported these products from subject sources for retail sale, and

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<sup>147</sup> The four pricing products were as follows:

**Product 1.**-- 77" Width x 24" Depth x 72" to 78" Height, 4 -level rack, boltless/welded steel shelving with steel wire decking with load capacity of 1,000 pounds to 3,000 pounds per level;

**Product 2.**-- 48" Width x 18" to 24" Depth x 72" to 86" Height, 5-level or 6-level, boltless/rivet steel shelving with particle board or laminate deck, with load capacity of 250 pounds to 1,000 pounds per level;

**Product 3.**-- 48" Width x 24" Depth x 72" to 78" Height, 5-level boltless/rivet steel shelving with steel wire deck, with load capacity of 250 pounds to 1,000 pounds per level;

**Product 4.**-- 36" Width x 18" Depth x 72" to 78" Height, 5-level boltless/rivet steel shelving with particle board or laminate deck, with load capacity of 250 pounds to 1,000 pounds per level.

CR/PR at V-5.

<sup>148</sup> CR/PR at V-6.

<sup>149</sup> CR/PR at V-6.

<sup>150</sup> CR/PR at Tables V-4 – V-7, V-14.

<sup>151</sup> CR/PR at Tables V-4 – V-7, V-14.

<sup>152</sup> *Derived from* CR/PR Table V-14.

these data also show that subject import purchase costs were generally lower than domestic sales prices.<sup>153</sup> Purchase cost data reported by these firms accounted for approximately \*\*\* percent of imports from Malaysia, \*\*\* percent of imports from Taiwan, \*\*\* percent of imports from Thailand, and \*\*\* percent of imports from Vietnam.<sup>154</sup> The largest importers reporting purchase cost data include \*\*\*, which accounted for \*\*\* percent and \*\*\* percent, respectively, of purchase cost data from all subject countries in 2022.<sup>155</sup> Based on the import purchase cost data obtained by the Commission, landed duty-paid (“LDP”) costs for cumulated subject imports were below the sales price for the domestic like product in 70 out of 99 (or 70.7 percent of) quarterly comparisons (involving \*\*\* units), at price-cost differentials ranging from \*\*\* percent to \*\*\* percent and averaging \*\*\* percent.<sup>156</sup> LDP costs for cumulated subject imports were higher than the sales price for the domestic like product in the remaining 29 (or 29.3 percent of) quarterly comparisons (involving \*\*\* units), at price-cost differentials ranging from \*\*\* percent to \*\*\* percent and averaging \*\*\* percent.<sup>157</sup>

We recognize that the import purchase cost data may not reflect the total cost of importing and therefore requested that importers for retail sale provide additional information regarding the costs and benefits of directly importing boltless steel shelving. Three out of five responding importers providing import purchase cost data reported that they incurred additional costs beyond the LDP costs associated with importing boltless steel shelving.<sup>158</sup> These costs ranged from three to 20 percent compared to LDP value.<sup>159</sup> Given that subject import costs were on average \*\*\* percent below domestic sales prices, as noted above, the

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<sup>153</sup> CR/PR at V-5.

<sup>154</sup> CR/PR at V-5.

<sup>155</sup> CR/PR at V-15. \*\*\* reported purchase cost data from India, Malaysia, and Taiwan, while \*\*\* reported purchase cost data from Thailand and Vietnam. *Id.* Imports from India are not eligible for cumulation; however, \*\*\* was not requested to report information regarding the costs and benefits of directly importing boltless steel shelving separately for the different subject sources.

<sup>156</sup> CR/PR at Tables V-12, V-16.

<sup>157</sup> CR/PR at Tables V-12, V-16.

<sup>158</sup> CR/PR at V-15.

<sup>159</sup> CR/PR at V-15. Firms were also asked to identify specific additional costs they incurred as a result of importing boltless steel shelving. Reported costs and their estimated share of LDP include handling and warehousing costs (1 and 6 percent), transportation costs including container costs (25 percent), occupancy cost (2 percent), and other costs including “insurance, supply chain, management” costs (2 percent). *Id.*

inclusion of the additional costs of \*\*\* percent would still leave the cost of importing subject imports frequently below the domestic sales prices.<sup>160</sup>

We have also considered purchasers' responses to the lost sales/lost revenue survey. Five of the six responding purchasers reported that, since 2020, they purchased subject imports instead of U.S.-produced product. All five reported that subject imports were priced lower than the domestic like product, and four of the five reported that price was a primary reason for their purchases of \*\*\* units of subject imports instead of domestically produced boltless steel shelving.<sup>161</sup>

Based on the foregoing, we find that subject import underselling was significant during the period of investigation. The underselling caused the domestic industry to lose sales and led to a substantial market share shift to lower priced cumulated subject imports, as cumulated subject imports gained \*\*\* percentage points of market share during the 2020-2022 period at the expense of the domestic industry.<sup>162</sup>

We have also considered price trends during the period of investigation. The domestic industry's sales prices generally increased for all four pricing products for which data are available.<sup>163</sup> The industry's sales price increases ranged from \*\*\* to \*\*\* percent, depending on the product.<sup>164</sup> Although pricing data for subject imports were not available for all quarters, cumulated subject import sales prices fluctuated during the period of investigation but decreased overall for pricing product 1, fluctuated but increased overall for pricing products 2

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<sup>160</sup> Firms were also asked to describe how these additional costs incurred by importing boltless steel shelving themselves compares with additional costs incurred when purchasing from a U.S. producer or U.S. importer, and their responses varied. CR/PR at V-16. Four importers, \*\*\*, reported that they compare costs of importing to the cost of purchasing from a U.S. producer and a U.S. importer in determining whether to import boltless steel shelving. Four importers identified benefits from importing boltless steel shelving directly instead of purchasing from U.S. producers or importers, including: price (\*\*\*), and inventory concerns and quality (\*\*\*). *Id.* Firms were also asked whether the import costs (both excluding and including additional costs) of boltless steel shelving they imported are lower than the price of purchasing boltless steel shelving from a U.S. producer or importer. *Id.* Two importers (\*\*\* reported that import costs are lower than purchasing product from domestic and import sources when not including the additional costs, and \*\*\* reported that inclusive of the additional costs, it is less expensive to import boltless steel shelving than to purchase from domestic and import sources. *Id.* Four importers estimated that they saved between \*\*\* percent of the purchase price by importing boltless steel shelving rather than purchasing from a U.S. producer, and two reported saving \*\*\* percent compared to purchasing the product from a U.S. importer. *Id.*

<sup>161</sup> CR/PR at Table V-18.

<sup>162</sup> CR/PR at Table C-1.

<sup>163</sup> CR/PR at Tables V-4 – V-7, V-12.

<sup>164</sup> CR/PR at Table V-12.

and 4, and fluctuated but returned to the same level for pricing product 3.<sup>165</sup> Cumulated subject import purchase costs fluctuated but increased overall for all four pricing products.<sup>166</sup> Additionally, one of three responding purchasers to the lost sales/lost revenue survey reported that the domestic industry lowered prices to compete with subject imports, by \*\*\* percent.<sup>167</sup>

We have also considered whether cumulated subject imports prevented price increases for domestically produced boltless steel shelving, which otherwise would have occurred. The domestic industry's COGS to net sales ratio increased from \*\*\* percent in 2020 to \*\*\* percent in 2021 before declining to \*\*\* percent in 2022, a level \*\*\* percentage points higher than in 2020.<sup>168</sup> The industry's financial data show that increases in the domestic producers' net sales AUV \*\*\* increases in per-unit costs from 2020 to 2021 but \*\*\* the cost increases between 2021 and 2022.<sup>169</sup> As discussed above in Section VII.B.1., apparent U.S. consumption declined during the period of investigation.

In any final phase of these investigations, we intend to further examine whether cumulated subject imports have prevented price increases, which otherwise would have occurred, to a significant degree.

Based on the record in the preliminary phase of these investigations, we find that cumulated subject imports significantly undersold the domestic like product, resulting in lost sales and market share from the domestic industry to cumulated subject imports from 2020 to 2022. We therefore find that cumulated subject imports had significant price effects.

#### **E. Impact of the Subject Imports<sup>170</sup>**

Section 771(7)(C)(iii) of the Tariff Act provides that the Commission, in examining the impact of the subject imports on the domestic industry, "shall evaluate all relevant economic factors which have a bearing on the state of the industry." These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits,

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<sup>165</sup> CR/PR at Tables V-4 – V-7, V-12.

<sup>166</sup> CR/PR at Tables V-4 – V-7, V-12.

<sup>167</sup> CR/PR at Table V-20.

<sup>168</sup> CR/PR at Table C-1.

<sup>169</sup> CR/PR at Tables VI-1, VI-2.

<sup>170</sup> Commerce initiated antidumping duty investigations based on estimated dumping margins of 35.45 to 81.12 percent for boltless steel shelving from Malaysia; 78.12 percent for boltless steel shelving from Taiwan; 176.62 to 187.03 percent for boltless steel shelving from Thailand; and 92.60 to 224.94 percent for boltless steel shelving from Vietnam. *Boltless Steel Shelving Units Prepackaged for Sale From India, Malaysia, Taiwan, Thailand and the Socialist Republic of Vietnam: Initiation of Less-Than-Fair-Value Investigations*, 88 Fed. Reg. 32188 (May 19, 2023).

net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debt, research and development, and factors affecting domestic prices. No single factor is dispositive and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”<sup>171</sup>

The domestic industry’s performance declined by almost every measure as the industry lost \*\*\* percentage points of market share to cumulated subject imports during the period of investigation and apparent U.S. consumption declined.

The domestic industry’s practical production capacity decreased \*\*\* percent over the period, from \*\*\* units in 2020 to \*\*\* units in 2021 and \*\*\* units in 2022.<sup>172</sup> Its production declined from \*\*\* units in 2020 to \*\*\* units in 2021 and \*\*\* units in 2022, which was \*\*\* percent lower than in 2020.<sup>173</sup> Its capacity utilization declined from \*\*\* percent in 2020 to \*\*\* percent in 2021, and \*\*\* percent in 2022, which was \*\*\* percentage points lower than in 2020.<sup>174</sup>

The domestic industry’s employment-related performance indicia generally declined during the period of investigation, including with respect to the number of production and related workers (“PRWs”),<sup>175</sup> wages paid,<sup>176</sup> and hours worked,<sup>177</sup> all of which declined during the period of investigation, and productivity,<sup>178</sup> which declined irregularly during that time. Hourly wages<sup>179</sup> and unit labor costs,<sup>180</sup> however, increased throughout the period.

The domestic industry’s U.S. shipments decreased \*\*\* percent over the period of investigation, from \*\*\* units in 2020 to \*\*\* units in 2021 and \*\*\* units in 2022.<sup>181</sup> As discussed

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

<sup>172</sup> CR/PR at Tables III-5, C-1.

<sup>173</sup> CR/PR at Tables III-5, C-1.

<sup>174</sup> CR/PR at Tables III-5, C-1.

<sup>175</sup> The number of PRWs declined from \*\*\* in 2020 to \*\*\* in 2021 and \*\*\* in 2022. CR/PR at Tables III-13, C-1.

<sup>176</sup> Wages paid totaled \$\*\*\* in 2020, \$\*\*\* in 2021, and \$\*\*\* in 2022. CR/PR at Tables III-13, C-1.

<sup>177</sup> Total hours worked totaled \*\*\* in 2020, \*\*\* in 2021, and \*\*\* in 2022. CR/PR at Tables III-13, C-1.

<sup>178</sup> Productivity was \*\*\* units per hour in 2020, \*\*\* units per hour in 2021, and \*\*\* units per hour in 2022. CR/PR at Tables III-13, C-1.

<sup>179</sup> Hourly wages were \$\*\*\* per hour in 2020, \$\*\*\* per hour in 2021, and \$\*\*\* per hour in 2022. CR/PR at Tables III-13, C-1.

<sup>180</sup> Unit labor costs were \$\*\*\* per unit in 2020, \$\*\*\* per unit in 2021, and \$\*\*\* per unit in 2022. CR/PR at Tables III-13, C-1.

<sup>181</sup> CR/PR at Tables III-7, C-1.



above, the domestic industry's market share decreased \*\*\* percentage points during the period of investigation, declining from \*\*\* percent in 2020 to \*\*\* percent in 2021 and \*\*\* percent in 2022, as the decline in the industry's U.S. shipments \*\*\* the \*\*\* percent decline in apparent U.S. consumption.<sup>182</sup>

The domestic industry's end-of-period inventories declined from \*\*\* units in 2020 to \*\*\* units in 2021 before increasing to \*\*\* units in 2022, a level \*\*\* percent lower in 2022 than in 2020.<sup>183</sup>

The domestic industry's financial performance generally declined during the period of investigation. The industry's net sales revenue increased irregularly from \$\*\*\* in 2020 to \$\*\*\* in 2021 and \$\*\*\* in 2022.<sup>184</sup> Its gross profits declined irregularly; they were \$\*\*\* in 2020, \$\*\*\* in 2021, and \$\*\*\* in 2022.<sup>185</sup> The domestic industry's operating income declined irregularly; it was \$\*\*\* in 2020, \*\*\* in 2021, and \$\*\*\* in 2022.<sup>186</sup> As a ratio to net sales, the domestic industry's operating income margin declined irregularly; it was \*\*\* percent in 2020, \*\*\* percent in 2021, and \*\*\* percent in 2022.<sup>187</sup> The industry's net income declined from \$\*\*\* in 2020 to \*\*\* in 2021, and increased to \$\*\*\* in 2022.<sup>188</sup> The domestic industry's net income margin was \*\*\* percent in 2020, \*\*\* percent in 2021, and \*\*\* percent in 2022.<sup>189</sup> Net assets decreased from 2020 to 2022, from \$\*\*\* in 2020 to \$\*\*\* in 2021 and \$\*\*\* in 2022.<sup>190</sup> Return on assets declined irregularly during this period, declining from \*\*\* percent in 2020 to \*\*\* percent in 2021, and increasing to \*\*\* percent in 2022.<sup>191</sup>

Capital expenditures increased irregularly during the period of investigation, declining from \$\*\*\* in 2020 to \$\*\*\* in 2021 before increasing to \$\*\*\* in 2022.<sup>192</sup> Research and development ("R&D") increased from \$\*\*\* in 2020 to \$\*\*\* in 2021 and \$\*\*\* in 2022.<sup>193</sup> Lastly,

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<sup>182</sup> CR/PR at Tables IV-10, C-1.

<sup>183</sup> CR/PR at Tables III-10, C-1.

<sup>184</sup> CR/PR Tables VI-1, VI-3, C-1.

<sup>185</sup> CR/PR Tables VI-1, VI-3, C-1.

<sup>186</sup> CR/PR Tables VI-1, VI-3, C-1.

<sup>187</sup> CR/PR Tables VI-1, VI-3, C-1.

<sup>188</sup> CR/PR Tables VI-1, VI-3, C-1.

<sup>189</sup> CR/PR Tables VI-1, VI-3, C-1.

<sup>190</sup> CR/PR at Tables VI-10, C-1.

<sup>191</sup> CR/PR at Table VI-11.

<sup>192</sup> CR/PR Tables VI-6, C-1.

<sup>193</sup> CR/PR at Tables VI-7, C-1.

\*\*\* responding U.S. producers reported that subject imports had negative effects on investment as well as growth and development during the period of investigation.<sup>194</sup>

Based on the record in the preliminary phase of these investigations, we find that the significant and increasing volume of cumulated subject imports undersold the domestic like product to a significant degree, causing a \*\*\* percentage point shift in market share from the domestic industry to cumulated subject imports from 2020 to 2022. As the domestic industry's market share declined during the period of investigation, the industry's production, capacity utilization, employment, U.S. shipments, revenues, and profits were lower than they otherwise would have been. Consequently, we find that cumulated subject imports had a significant impact on the domestic industry.

We have also considered whether there are other factors that may have had an impact on the domestic industry to ensure that we are not attributing injury from such other factors to subject imports. As discussed above, nonsubject imports maintained only a small presence in the U.S. market, accounting for less than \*\*\* percent of apparent U.S. consumption throughout the period of investigation; imports from India's market share peaked at \*\*\* percent in 2022. Therefore, nonsubject imports and imports from India cannot explain the injury to the domestic industry that we have attributed to cumulated subject imports.

We recognize that apparent U.S. consumption of boltless steel shelving declined \*\*\* percent during the period of investigation.<sup>195</sup> We find, however, that declining demand cannot fully account for the declines in domestic industry performance that resulted from the industry's loss of market share to cumulated subject imports during the period of investigation. Indeed, many measures of the domestic industry's performance declined to a greater degree than would be expected based on the \*\*\* percent decline in apparent U.S. consumption between 2020 and 2022, including a \*\*\* percent decline in production and a \*\*\* percent decline in U.S. shipments over the same period.<sup>196</sup> Accordingly, we find that declining demand does not fully explain the domestic industry's deteriorating performance.

As discussed above, the CPSC announced a voluntary recall of 2.2 million units of Edsal's boltless steel shelving in February 2021.<sup>197</sup> The parties dispute the extent to which the recall

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<sup>194</sup> CR/PR at Tables VI-13 – VI-14.

<sup>195</sup> CR/PR at Table C-1.

<sup>196</sup> CR/PR at Table C-1.

<sup>197</sup> CR/PR at Table III-3 and VI-14.

may have contributed to the domestic industry's condition during the period of investigation.<sup>198</sup> \*\*\*.<sup>199</sup> However, according to \*\*\*,<sup>200</sup> We note that although the recall was for 2.2 million units, Edsal reported that the recall ultimately affected only \*\*\* units, as discussed above.<sup>201</sup> We intend to further investigate this issue in any final phase of these investigations.

In sum, based on the record of the preliminary phase of these investigations, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of cumulated subject imports.

## **VIII. Threat of Material Injury by Reason of Subject Imports from India**

### **A. Legal Standard**

Section 771(7)(F) of the Tariff Act directs the Commission to determine whether the U.S. industry is threatened with material injury by reason of the subject imports by analyzing whether "further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted."<sup>202</sup> The Commission may not make such a determination "on the basis of mere conjecture or supposition," and considers the threat factors "as a whole" in making its determination whether dumped or subsidized imports are imminent and whether material injury by reason of subject imports would occur unless an order is issued.<sup>203</sup> In making our determination, we consider all statutory threat factors that are relevant to these investigations.<sup>204</sup>

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<sup>198</sup> See, e.g., Petitioner Postconference Br., Exhibit 1, paras. 28-34; Jaken Postconference Statement at 1-4 (arguing that to the extent that Petitioner lost sales during the period of investigation it was related to the poor quality of the domestic like product and the product recall that Edsal experienced, rather than subject imports).

<sup>199</sup> CR/PR at II-14. We note that \*\*\* confirmed that they purchased \*\*\* units of lower-priced subject imports instead of domestically produced boltless steel shelving and that the lower price was a primary factor in their decision to buy the imports. CR/PR at Table V-8. This \*\*\* volume of confirmed lost sales does not appear to be related to the recall.

<sup>200</sup> CR/PR at II-14.

<sup>201</sup> CR/PR at VI-14.

<sup>202</sup> 19 U.S.C. § 1677(7)(F)(ii).

<sup>203</sup> 19 U.S.C. § 1677(7)(F)(ii).

<sup>204</sup> These factors are as follows:

(I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable  
(Continued...)

## B. Cumulation for Threat

Under section 771(7)(H) of the Tariff Act, the Commission may “to the extent practicable” cumulatively assess the volume and price effects of subject imports from all countries as to which petitions were filed on the same day if the requirements for cumulation in the material injury context are satisfied.<sup>205</sup>

Petitioner argues that the Commission should exercise its discretion to cumulate imports from all subject sources, including India, for purposes of any threat analysis, reiterating its assertion that the statutory factors supporting cumulation for present material injury are met in this case.<sup>206</sup>

Respondents argue that the Commission should exercise its discretion to not cumulate subject imports from India with subject imports from other sources for purposes of any threat

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subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement) and whether imports of the subject merchandise are likely to increase,

(II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,

(III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,

(IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices and are likely to increase demand for further imports,

(V) inventories of the subject merchandise,

(VI) the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products,

...

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

(IX) any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).

19 U.S.C. § 1677(7)(F)(i). To organize our analysis, we discuss the applicable statutory threat factors using the same volume/price/impact framework that applies to our material injury analysis. Statutory threat factors (I), (II), (III), (V), and (VI) are discussed in the analysis of subject import volume. Statutory threat factor (IV) is discussed in the analysis of subject import price effects. Statutory factors (VIII) and (IX) are discussed in the analysis of impact. Statutory factor (VII) concerning agricultural products is inapplicable to this investigation.

<sup>205</sup> 19 U.S.C. § 1677(7)(H).

<sup>206</sup> Petitioner Postconference Br. at 40-41.

analysis.<sup>207</sup> Specifically, they contend that because subject imports from India are new to the U.S. market, their volume was significantly lower than the volume of subject imports from other sources during the period of investigation and is likely to remain at relatively lower levels in the imminent future.<sup>208</sup> Respondents also argue that the prices of subject imports from India are higher than the prices of both subject imports from other sources and the domestic like product.<sup>209</sup>

As discussed above in Section VI.B., the petitions for these investigations were filed on the same day, and there is a reasonable overlap of competition between subject imports from Malaysia, Taiwan, Thailand, and Vietnam and between imports from each of these subject countries and the domestic like product. There is no information on the record to suggest that the reasonable overlap of competition between and among imports from these subject sources and the domestic like product will not continue into the imminent future.

We also find that there will likely be a reasonable overlap of competition between and among subject imports from India, subject imports from other sources, and the domestic like product. The record indicates that subject imports from India are generally fungible with subject imports from other sources and the domestic like product.<sup>210</sup> After subject imports from India entered the U.S. market in 2022, they overlapped with subject imports from other sources and the domestic like product in terms of channels of distribution and geographic markets, and were simultaneously present in the U.S. market with them.<sup>211</sup> In addition, Triune is currently engaged in a \*\*\* that could result in an order for Triune, as discussed in section V.B above. Based on this information, we find that the reasonable overlap of competition between and among subject imports from India, subject imports from other sources, and the domestic like product is likely to continue into the imminent future.

We recognize that subject imports from India are relatively new to the market and that the pricing product data show that the subject imports' LDP cost was more than the price of the domestic like product in the few quarters of available comparisons.<sup>212</sup> Nevertheless, subject imports from India compete with the domestic like product and subject imports from other sources for sales to the same customer, \*\*\*, which is currently engaged in \*\*\*.<sup>213</sup> Thus, for

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<sup>207</sup> Respondents Postconference Br. at 17-19.

<sup>208</sup> Respondents Postconference Br. at 17-18.

<sup>209</sup> Respondents Postconference Br. at 18-19.

<sup>210</sup> CR/PR at Tables II-11, IV-6, IV-7.

<sup>211</sup> CR/PR at Tables II-1, II-2, IV-8, IV-10, V-4 – V-7.

<sup>212</sup> CR/PR at Table V-8.

<sup>213</sup> CR/PR at Tables IV-1, V-17.

purposes of our preliminary determinations, we do not find differences in likely conditions of competition sufficient to warrant considering subject imports from India separately for purposes of our threat analysis. We therefore exercise our discretion to cumulate subject imports from India, Malaysia, Taiwan, Thailand, and Vietnam for our analysis of whether there is a reasonable indication of a threat of material injury to the domestic industry by reason of imports from India.<sup>214</sup>

## **C. Analysis of Threat of Material Injury Factors**

### **1. Likely Volume**

As discussed in section VII.C above, we have found that the volume of subject imports from Malaysia, Taiwan, Thailand, and Vietnam, on a cumulated basis, was significant and increased significantly during the period of investigation, in absolute terms and relative to U.S. consumption. Including subject imports from India, the volume of cumulated subject imports increased by 18.2 percent overall during the period of investigation, from 1.66 million units in 2020 to 1.94 million units in 2021 and 1.96 million units in 2022.<sup>215</sup> Cumulated subject imports' share of apparent U.S. consumption increased \*\*\* percentage points during the same period , increasing from \*\*\* percent in 2020 to \*\*\* percent in 2021 and \*\*\* percent in 2022.<sup>216</sup> We find that cumulated subject imports are likely to maintain a significant presence in the U.S. market, and that the significant increase in cumulated subject import volume observed during the period of investigation is likely to continue in the imminent future absent relief.

The record of the preliminary phase of the investigations indicates that cumulated subject producers have the ability and the incentive to increase their exports to the United States in the imminent future. Cumulated subject producers increased their capacity during the period of investigation, from \*\*\* units in 2020 to \*\*\* units in 2021 and \*\*\* units in 2022.<sup>217</sup> Cumulated subject producers project that their capacity will decline to \*\*\* units 2023 and to \*\*\* units in 2024.<sup>218</sup>

The cumulated subject producers' rate of capacity utilization increased irregularly during the period of investigation, declining from \*\*\* percent in 2020 to \*\*\* in 2021, before increasing

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<sup>214</sup> We intend to further examine this issue in any final phase of the investigations; the parties are invited to submit comments on this issue and any supporting evidence onto the record.

<sup>215</sup> CR/PR at Table IV-2.

<sup>216</sup> CR/PR at Tables IV-10, C-1.

<sup>217</sup> CR/PR at Table VII-31.

<sup>218</sup> CR/PR at Table VII-31.

to \*\*\* percent in 2022.<sup>219</sup> In 2022, the cumulated subject producers possessed excess capacity of \*\*\* units, equivalent to \*\*\* percent of apparent U.S. consumption that year.<sup>220</sup> They project that their capacity utilization will decline to \*\*\* percent in 2023 and \*\*\* percent in 2024, which would generate even more excess capacity.<sup>221</sup> Subject producers in India and Taiwan could also increase their exports to the United States by shifting production from out-of-scope products to boltless steel shelving, as \*\*\* of \*\*\* responding producers in those countries reported the ability to product shift.<sup>222</sup>

Although cumulated subject producers' end-of-period inventories and U.S. importer inventories of subject imports generally decreased during the period of investigation,<sup>223</sup> the latter remained significant and U.S. importers also reported arranged subject import orders of \*\*\* units through December 2023.<sup>224</sup>

Cumulated subject producers also have the incentive to increase exports to the United States in the imminent future, given their export orientation and increasing reliance on the U.S. market during the period of investigation. Cumulated subject producers increased their exports of boltless steel shelving throughout the period of investigation, from \*\*\* units in 2020 to \*\*\* units in 2021 and \*\*\* units in 2022, and these exports accounted for between \*\*\* and \*\*\* percent of subject producers' total shipments each year.<sup>225</sup> Exports to the United States accounted for the \*\*\* of cumulated subject producers' total shipments, accounting for \*\*\* percent in 2020, \*\*\* percent in 2021, and \*\*\* percent in 2022. By contrast, their shipments to home market customers as a share of total shipments were \*\*\* percent in 2020, \*\*\* percent in 2021, and \*\*\* percent in 2022. Further, cumulated subject producers' exports to third country markets accounted for an overall declining share of total shipments during the period, even in the absence of third country trade measures; exports to all other markets accounted for \*\*\* percent of total shipments in 2020, \*\*\* percent in 2021, and \*\*\* percent in 2022.<sup>226</sup> These data indicate that cumulated subject producers were highly export oriented and increasingly dependent on the U.S. market during the period of investigation.

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<sup>219</sup> CR/PR at Table VII-31.

<sup>220</sup> *Derived from* CR/PR at Tables IV-10, VII-31.

<sup>221</sup> CR/PR at Table VII-31.

<sup>222</sup> CR/PR at Tables VII-7, VII-16.

<sup>223</sup> CR/PR at Tables VII-31 (showing end-of-period inventories of \*\*\* units in 2020 and \*\*\* units in 2022) and VII-33 (showing U.S. importer inventories of \*\*\* units in 2020, \*\*\* units in 2021, and \*\*\* units in 2022).

<sup>224</sup> CR/PR at Table VII-34.

<sup>225</sup> CR/PR at Table VII-31.

<sup>226</sup> CR/PR at Table VII-31.

In light of the significant increase in cumulated subject import volume and market share during the period of investigation; the large and increasing capacity of the cumulated subject producers, including substantial excess capacity, and the ability of a majority of responding subject producers to product shift; and the cumulated subject producers' export orientation and increasing dependence on the U.S. market, we find that there is the likelihood of substantially increased subject import volume in the imminent future in the absence of relief.

## **2. Likely Price Effects**

As addressed in section VII.B.3. above, we have found a moderate-to-high degree of substitutability between subject imports and the domestic like product, and that price is an important factor in purchasing decisions, among other important factors. Additionally, as addressed in Section VII.D., we have found that subject imports from Malaysia, Taiwan, Thailand, and Vietnam, on a cumulated basis, undersold the domestic like product to a significant degree, causing a \*\*\* percentage point shift in market share from the domestic industry to those subject imports.

Including subject imports from India, cumulated subject imports undersold the domestic like product in 85.2 percent of quarterly comparisons in quarters corresponding to 58.5 percent of reported cumulated subject import volume.<sup>227</sup> Based on the import purchase cost data obtained by the Commission, LDP costs for cumulated subject imports were below the sales price for the domestic like product in 70 out of 101 (or 69.3 percent of) quarterly comparisons (involving \*\*\* units), at price-cost differentials ranging from \*\*\* percent to \*\*\* percent and averaging \*\*\* percent.<sup>228</sup> LDP costs for cumulated subject imports were higher than the sales price for the domestic like product in the remaining 31 (or 30.7 percent of) quarterly comparisons (involving 896,054 units), at price-cost differentials ranging from \*\*\* percent to \*\*\* percent and averaging \*\*\* percent.<sup>229</sup> Even recognizing that the import purchase cost data may not reflect the total cost of importing, given that subject import costs were on average \*\*\* percent below domestic sales prices, the inclusion of the additional reported costs of \*\*\* percent would still leave the cost of importing subject imports frequently below the domestic

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<sup>227</sup> CR/PR at Tables V-4 – V-7, V-14. Because purchase cost data accounted for \*\*\* imports from India, these data are the same as for present material injury, for which subject imports from India were not part of cumulated subject imports.

<sup>228</sup> CR/PR at Tables V-12, V-16.

<sup>229</sup> CR/PR at Tables V-12, V-16.



sales prices.<sup>230</sup> Thus, cumulated subject imports undersold the domestic like product during the period of investigation.

In the absence of any evidence that the pattern of subject import underselling is likely to change, we find that cumulated subject imports are likely to continue to undersell the domestic like product in the imminent future. Given the moderate-to-high degree of substitutability between subject imports and the domestic like product and the importance of price to purchasers, we find that the significant subject import underselling that is likely would increase demand for further imports in the imminent future, thereby contributing to an additional shift in market share from the domestic industry to subject imports, and/or result in subject imports entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices.

### **3. Likely Impact**

As discussed in Section VII.E. above, based on the record in the preliminary phase of these investigations, we have found that the significant and increasing volume of subject imports from Malaysia, Taiwan, Thailand, and Vietnam, on a cumulated basis, significantly undersold the domestic like product and took sales and market share directly from the domestic industry, contributing to the industry's declining performance during the period of investigation. Given the reasonable indication that the domestic industry is materially injured by reason of subject imports from Malaysia, Taiwan, Thailand, and Vietnam, and the substantial declines that the domestic industry experienced in many of its performance indicators during the period of investigation, as discussed above, we find that the domestic industry is in a vulnerable condition.

In light of the vulnerability of the domestic industry, and our findings that cumulated subject import volume is likely to increase further from already significant levels and continue to undersell the domestic like product, we conclude that cumulated subject imports would likely have a significant impact on the domestic industry in the imminent future, in the absence of relief. Specifically, the likely increased volumes of low-priced cumulated subject imports would likely depress or suppress domestic prices and/or displace sales of the domestic like product and cause the domestic industry to lose additional market share, adversely affecting the domestic industry's production, employment, revenues, and financial performance. \*\*\*

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<sup>230</sup> As discussed in greater detail in note 160 above, firms described how these additional costs incurred by importing boltless steel shelving themselves compares with additional costs incurred when purchasing from a U.S. producer or U.S. importer. See CR/PR at V-16.

responding U.S. producers reported anticipating negative effects from subject imports in the absence of relief.<sup>231</sup>

We have also considered whether factors other than subject imports threaten to injure the domestic industry. As discussed in Section VII.E. above, nonsubject imports accounted for only a minimal share of apparent U.S. consumption during the period of investigation. There is no information on the record that nonsubject imports would change the impact subject imports are likely to have on the domestic industry in the imminent future. Additionally, although demand declined during the period of investigation, we found that declining demand cannot fully explain the domestic industry's deteriorating condition during the period investigation. Petitioner contends that demand will be stable in the near future<sup>232</sup> while Respondents anticipate that demand will decline in 2023.<sup>233</sup> Given our conclusion that low-priced cumulated subject imports are likely to continue to increase and take market share from the domestic industry and/or depress or suppress domestic prices, we find that cumulated subject imports are likely to continue to have an impact on the industry that is distinct from the impact of any continued decline in demand.<sup>234</sup>

In sum, based on the record of the preliminary phase of the investigations, we determine that there is a reasonable indication that an industry in the United States is threatened with material injury by reason of imports of boltless steel shelving from India.

## **IX. Conclusion**

For the reasons stated above, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of subject imports of boltless steel shelving from Malaysia, Taiwan, Thailand, and Vietnam that are allegedly sold in the United States at less than fair value. We also determine that there is a reasonable indication that an industry in the United States is threatened with material injury by reason of imports of boltless steel shelving from India that are allegedly sold in the United States at less than fair value.

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<sup>231</sup> CR/PR at Tables VI-12-VI-13.

<sup>232</sup> Conf. Tr. at 59 (White).

<sup>233</sup> Respondents Postconference Br. at 14.

<sup>234</sup> As indicated above, we intend to further investigate whether and to what extent Edsal's recall may have contributed to the domestic industry's condition during the period of investigation.

# Part I: Introduction

## Background

These investigations result from petitions filed with the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (“USITC” or “Commission”) by Edsal Manufacturing Co., Inc., Chicago, Illinois (“Edsal”), on April 25, 2023, alleging that an industry in the United States is materially injured and threatened with material injury by reason of less-than-fair-value (“LTFV”) imports of boltless steel shelving units prepackaged for sale (“boltless steel shelving”)<sup>1</sup> from India, Malaysia, Taiwan, Thailand, and Vietnam. Table I-1 presents information relating to the background of these investigations.<sup>2 3</sup>

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

Effective date	Action
April 25, 2023	Petitions filed with Commerce and the Commission; institution of the Commission investigations (88 FR 27529, May 2, 2023)
May 15, 2023	Commerce’s notice of initiation (88 FR 32188, May 19, 2023)
May 16, 2023	Commission’s conference
June 8, 2023	Commission’s vote
June 9, 2023	Commission’s determinations
June 16, 2023	Commission’s views

## Statutory criteria

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

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

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

<sup>2</sup> Pertinent Federal Register notices are referenced in appendix A, and may be found at the Commission’s website ([www.usitc.gov](http://www.usitc.gov)).

<sup>3</sup> A list of witnesses appearing at the conference is presented in appendix B of this report.

*determination regarding whether there is material injury by reason of imports.*

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

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

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

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

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

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

## Organization of report

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

## Market summary

Boltless steel shelving is generally used for storage in homes, garages, offices, and commercial and industrial operations. The leading U.S. producer of boltless steel shelving is Edsal, while leading producers of boltless steel shelving outside the United States include Triune Technofab Private Limited ("Triune") of India; Eonmetall Industries Sdn. Bhd. ("Eonmetall") of Malaysia; Taiwan Shin Yeh Enterprise Co., Ltd. ("Shin Yeh") of Taiwan; Fuding Industrial Co. Ltd. ("Fuding") of Thailand; and Quoc Ham Co. Ltd. ("Quoc Ham") of Vietnam. The leading U.S. importer of boltless steel shelving from India and Malaysia is \*\*\*. The leading U.S. importer of boltless steel shelving from Taiwan and Vietnam is \*\*\*, and \*\*\* is the leading U.S. importer of shelving from Thailand. Leading importers of product from nonsubject countries include \*\*\*. U.S. purchasers of boltless steel shelving are primarily retailers; leading purchasers include \*\*\*.

Apparent U.S. consumption of boltless steel shelving totaled approximately \*\*\* units (\$\*\*\*) in 2022. Currently, two firms are known to produce boltless steel shelving in the United States. U.S. producers' U.S. shipments of boltless steel shelving totaled \*\*\* units (\$\*\*\*) in 2022, and accounted for \*\*\* percent of apparent U.S. consumption by quantity and \*\*\* percent by value. U.S. shipments of imports from subject sources totaled 2.0 million units (\$182.7 million) in 2022 and accounted for \*\*\* percent of apparent U.S. consumption by quantity and \*\*\* percent by value. U.S. imports from nonsubject sources totaled \*\*\* units (\$\*\*\*) in 2022 and accounted for \*\*\* percent of apparent U.S. consumption by quantity and \*\*\* percent by value.

## Summary data and data sources

A summary of data collected in these investigations is presented in appendix C, table C-1. Except as noted, U.S. industry data are based on questionnaire responses of two firms that accounted for all U.S. production of boltless steel shelving during 2022. U.S. imports are based on the questionnaire responses of 11 importers that accounted for:

- \*\*\* percent of official import statistics for India;
- \*\*\* percent of official import statistics for Malaysia;
- \*\*\* percent of official import statistics for Taiwan;
- \*\*\* percent of official import statistics for Thailand;
- \*\*\* percent of official import statistics for Vietnam;
- \*\*\* percent of official import statistics for subject sources;<sup>6</sup> and
- \*\*\* percent of official import statistics for nonsubject sources.<sup>7</sup>

## Previous and related investigations

Boltless steel shelving has been the subject of one prior countervailing duty investigation and one prior antidumping duty investigation in the United States. Those investigations resulted from petitions filed on August 26, 2014 with Commerce and the Commission by Edsal. The Commission determined on October 7, 2015 that the domestic industry was materially injured by reason of imports of boltless steel shelving from China that were found by Commerce to be sold in the United States at LTFV, and to be subsidized by the government of China. On October 21, 2015, Commerce issued its antidumping and countervailing duty orders with the final weighted-average dumping margins ranging from 17.55 to 112.68 percent and net subsidy rates ranging from 12.40 to 80.45 percent.<sup>8</sup> The Commission instituted its reviews of the orders on September 1, 2020, and determined on April 29, 2021 that revocation of the antidumping and countervailing duty orders on boltless steel

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<sup>6</sup> Coverages for all subject sources, and for India, are based on reduced official import statistics volumes following confirmation by importer \*\*\*.

<sup>7</sup> Under HTS statistical reporting number 9403.20.0075 in 2022. Petitioner asserts that entries into the U.S. under this HTS number from Canada, China, Mexico, and South Korea, which combined account for 95.5 percent of nonsubject imports reported in official import statistics in 2022, are misclassified. Petition, pp. 12-13. For more information, see part IV.

<sup>8</sup> Boltless Steel Shelving Units Prepackaged for Sale from China, Investigation Nos. 701-TA-523 and 731-TA-1259 (Review), USITC Publication 5190, April 2021, p. I-3.

shelving from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.<sup>9</sup> On May 12, 2021 Commerce published a notice in the *Federal Register* continuing the orders.<sup>10</sup>

## **Nature and extent of alleged subsidies and sales at LTFV**

### **Alleged sales at LTFV**

On May 19, 2023, Commerce published a notice in the Federal Register of the initiation of its antidumping duty investigations on boltless steel shelving from India, Malaysia, Taiwan, Thailand, and Vietnam.<sup>11</sup> Commerce has initiated antidumping duty investigations based on estimated dumping margins of 175.31 percent for boltless steel shelving from India; 35.45 to 81.12 percent for boltless steel shelving from Malaysia; 78.12 percent for boltless steel shelving from Taiwan; 176.62 to 187.03 percent for boltless steel shelving from Thailand; and 92.60 to 224.94 percent for boltless steel shelving from Vietnam.

## **The subject merchandise**

### **Commerce's scope**

In the current proceeding, Commerce has defined the scope as follows:<sup>12</sup>

*The scope of these investigations covers boltless steel shelving units prepackaged for sale, with or without decks (boltless steel shelving). The term "prepackaged for sale" means that, at a minimum, the steel vertical supports ( i.e., uprights and posts) and steel horizontal supports ( i.e., beams, braces) necessary to assemble a completed shelving unit (with or without decks) are packaged together for ultimate purchase by the end-user. The scope also includes add-on kits. Add-on kits include, but are not limited to, kits that allow the end-user to add an extension shelving unit onto an existing boltless steel shelving unit such that the extension and the original unit will share common frame elements ( e.g., two posts). The term "boltless" refers to steel shelving in which the vertical and horizontal supports forming the frame are assembled primarily without the use of nuts and bolts, or screws. The vertical and horizontal support members for boltless steel shelving are assembled by methods such as, but not limited to, fitting a rivet, punched or cut tab, or other similar connector on*

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<sup>9</sup> 86 FR 23981, May 5, 2021.

<sup>10</sup> 86 FR 26000, May 12, 2021.

<sup>11</sup> 88 FR 32188, May 19, 2023.

<sup>12</sup> 88 FR 32188, May 19, 2023.

*one support into a hole, slot or similar receptacle on another support. The supports lock together to form the frame for the shelving unit, and provide the structural integrity of the shelving unit separate from the inclusion of any decking. The incidental use of nuts and bolts, or screws to add accessories, wall anchors, tie-bars or shelf supports does not remove the product from scope. Boltless steel shelving units may also come packaged as partially assembled, such as when two upright supports are welded together with front-to-back supports, or are otherwise connected, to form an end unit for the frame. The boltless steel shelving covered by these investigations may be commonly described as rivet shelving, welded frame shelving, slot and tab shelving, and punched rivet (quasi-rivet) shelving as well as by other trade names. The term “deck” refers to the shelf that sits on or fits into the horizontal supports (beams or braces) to provide the horizontal storage surface of the shelving unit.*

*The scope includes all boltless steel shelving meeting the description above, regardless of: (1) vertical support or post type (including but not limited to open post, closed post and tubing); (2) horizontal support or beam/brace profile (including but not limited to Z-beam, C-beam, L-beam, step beam and cargo rack); (3) number of supports; (4) surface coating (including but not limited to paint, epoxy, powder coating, zinc and other metallic coating); (5) number of levels; (6) weight capacity; (7) shape (including but not limited to rectangular, square, and corner units); (8) decking material (including but not limited to wire decking, particle board, laminated board or no deck at all); or (9) the boltless method by which vertical and horizontal supports connect (including but not limited to keyhole and rivet, slot and tab, welded frame, punched rivet and clip).*

*Specifically excluded from the scope are:*

- Wall-mounted shelving, defined as shelving that is hung on the wall and does not stand on, or transfer load to, the floor. The addition of a wall bracket or other device to attach otherwise freestanding subject merchandise to a wall does not meet the terms of this exclusion;*
- Wire shelving units, which consist of shelves made from wire that incorporates both a wire deck and wire horizontal supports (taking the place of the horizontal beams and braces) into a single piece with tubular collars that slide over the posts and onto plastic sleeves snapped on the posts to create the finished shelving unit;*



- *Bulk-packed parts or components of boltless steel shelving units;*  
*and*
- *Made-to-order shelving systems.*

## **Tariff treatment**

Based upon the scope set forth by Commerce, information available to the Commission indicates that the merchandise subject to this investigation is imported under HTS statistical reporting number 9403.20.0075 of the Harmonized Tariff Schedule of the United States (“HTSUS” or “HTS”). The 2023 general rate of duty is “Free” for HTS subheading 9403.20.00.<sup>13</sup> Boltless steel shelving is not included among the steel articles or derivative steel articles subject to the 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended.<sup>14</sup> Effective May 10, 2019, boltless steel shelving originating in China, being subject to existing antidumping and countervailing duty orders,<sup>15</sup> is also subject to an additional 25 percent ad valorem duty under section 301 of the Trade Act of 1974, as amended.<sup>16</sup> Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

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<sup>13</sup> USITC, HTSUS (2023) Revision 6, USITC Publication 5440, May 2023, p. 94-8.

<sup>14</sup> 83 FR 11625, March 15, 2018; 85 FR 5281, January 29, 2020.

<sup>15</sup> Commerce continued its existing antidumping and countervailing duty orders on boltless steel shelving originating in China, effective May 12, 2021. 86 FR 26000, May 12, 2021.

<sup>16</sup> HTS subheading 9403.20.00 was included in the Office of the United States Trade Representative’s (“USTR’s”) third enumeration (“Tranche 3” or “List 3”) of products originating in China that became subject to an additional 10 percent ad valorem duty (Annexes A and C of 83 FR 47974, September 21, 2018), effective September 24, 2018. Escalation of this duty to 25 percent ad valorem was rescheduled from January 1, 2019 (Annex B of 83 FR 47974, September 21, 2018) to March 2, 2019 (83 FR 65198, December 19, 2018), but was subsequently postponed until further notice (84 FR 7966, March 5, 2019), and then was implemented, effective May 10, 2019 (84 FR 20459, May 9, 2019). A subsequent modification was provided for subject goods exported from China prior to May 10, 2019, not to be subject to the escalated 25 percent duty for such goods entered into the United States prior to June 1, 2019 (84 FR 21892, May 15, 2019) with the entry date subsequently being extended to prior to June 15, 2019 (84 FR 26930, June 10, 2019).

See also HTS heading 9903.88.03 and U.S. notes 20(e) and 20(f) to HTS Subchapter III of Chapter 99 and related tariff provisions for this duty treatment. USITC, HTSUS (2023) Revision 6, USITC Publication 5440, May 2023, pp. 99-III-27 – 99-III-28, 99-III-51, 99-III-223 – 99-III-224, 99-III-231, 99-III-241, 99-III-245 – 99-III-246, 99-III-301, 99-III-303, 99-III-305 – 99-III-307, 99-III-309.

## The product

### Description and applications<sup>17</sup>

Boltless steel shelving units feature a “boltless” system of assembly with rivets or other protrusions on horizontal support members that fit into slots in the vertical posts (uprights) of the units and thereby avoid the need for fasteners (figure I-1).<sup>18</sup> The boltless system permits assembly with only minimal tools.<sup>19</sup>

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<sup>17</sup> Unless noted otherwise, information about the description and use is derived from the petition, vol. I, April 25, 2023, pp. 7–11.

<sup>18</sup> Some units may include a minimal number of bolts, e.g., in support brackets (referred to as “anti-spreader bars”) but nevertheless are still considered by the industry as boltless steel shelving. Conference transcript, p. 85 (Kruger); petitioner’s postconference brief, exh. 1: Declaration of Chris Kruger, p. 12.

<sup>19</sup> Otherwise, having a rubber mallet is handy for tapping the pieces into place. Conference transcript, p. 18 (White).

**Figure I-1**

**Boltless steel shelving unit: Open storage design for functional utility and durability over aesthetic appearance**

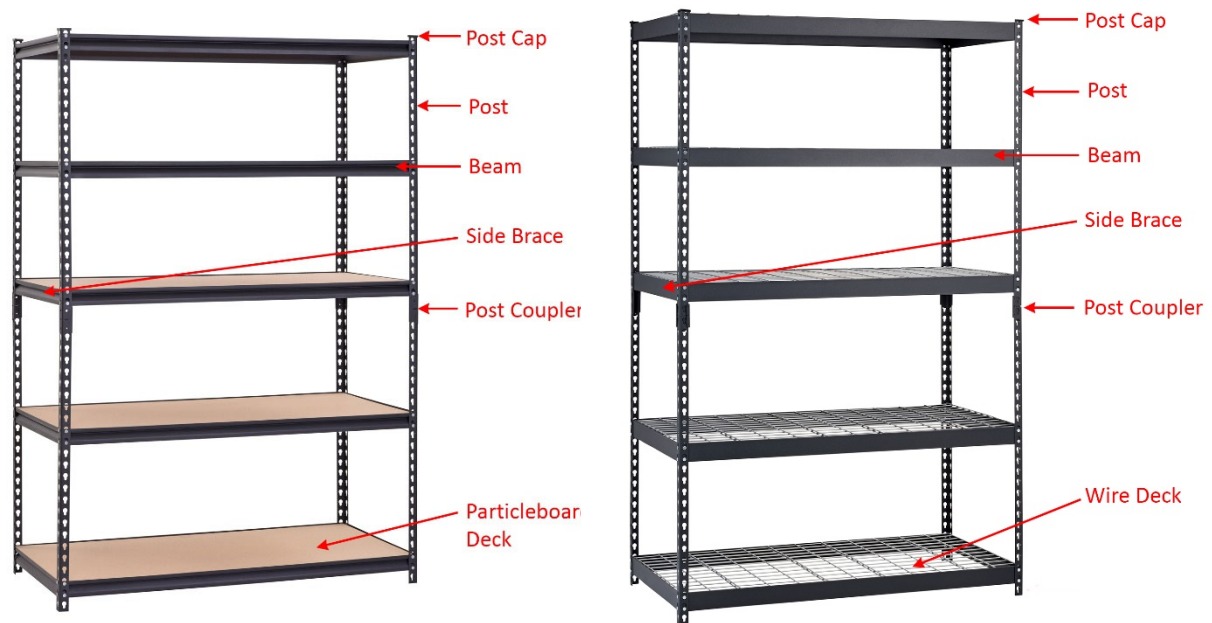


Source: Petition, p. 9.

### **Description**

Boltless steel shelving have a relatively high load capacity and consist of stand-alone shelving in which horizontal support members (front and rear beams and side braces) connect to vertical posts without the use of nuts, bolts, screws, tubular collars, or other fasteners. These units are designed for end-user convenience by the boltless system that eliminates the need for tools and as a prepackaged unit, containing all the vertical and horizontal components, that is available in several common sizes. Since boltless steel shelving is prepackaged, the end user can readily purchase the unit at either a large home-improvement store or mass-merchandise retailer, and handle, transport, and install it at the ultimate location. The units may be sold with or without decking (shelves), typically of particle board, other composite materials (painted, printed, or laminated on the top), or steel wire mesh (figure I-2).

**Figure I-2**  
**Boltless steel shelving unit: Components and decking**



Boltless steel shelving with particle-board decking

Boltless steel shelving with wire decking

Source: Edsal, provided by Georgetown Economic Services LLC ("GES"), May 19, 2023.

The boltless system consists of either rivets or punched or cut tabs on the beams and braces that fit into slots that are punched or cut into the posts at set intervals (figure I-3).<sup>20</sup> Boltless steel shelving uses several configurations of beam and brace profiles to provide high load-bearing capacity and support the decking (figure I-4).<sup>21</sup> The Z-beam, C-beam, L-beam, and step beam are commonly used in boltless steel shelving.

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<sup>20</sup> Beams are horizontal supports that span the width of the shelving unit. Braces are also horizontal supports, but they span the depth of the unit to connect the front and rear posts. The beams and braces are set at the same height to provide a ledge for the decking.

<sup>21</sup> Welded boltless steel shelving features horizontal and diagonal cross braces welded onto the vertical posts. The horizontal beams include either rivets or tabs to fit into the slotted posts. Conference transcript, p. 86 (Kruger).

**Figure I-3**

**Boltless steel shelving unit: Rivet connections of an adjoining beam and brace into a slotted post**



Brace and beam fitted with rivets into the slotted post support the particle-board decking



Close-up view of the brace and beam fitted with rivets into the slotted post

Source: Edsal, provided by GES, May 19, 2023.

**Figure I-4**

**Boltless steel shelving unit: Welded side frames, welded beams with tie-bar supports, and wire decking for high load-bearing capacity**



Welded boltless steel shelving



Welded side frame

Source: Edsal, provided by GES, May 19, 2023.

Boltless steel shelving units are produced and sold in common shelving unit sizes and approximate per-shelf weight capacities, although the scope of the subject product in this investigation is not limited by these parameters. Both the shelving unit size and per-shelf weight capacity determine the construction and configuration of the horizontal support

members and the vertical posts, and the need for other supports (i.e., front-to-back supports that connect the front posts, rear posts, and tie bars or center supports for decking).<sup>22</sup> Typical sizes for widths are 36, 48, 60, or 77 inches; depths are 18 or 24 inches; and heights are 60, 72, 78, or 84 inches.<sup>23</sup>

Boltless steel shelving units frequently include 3–6 levels of decking in the package.<sup>24</sup> Popular decking materials are particle board, laminated boards, and steel wire. Some units may be sold without decking, so the user can purchase their own choice of decking. Other accessories include add-on kits for the end user to add an extension shelving unit onto an existing boltless steel shelving unit so that the original unit and extension share some common frame elements, such as posts.<sup>25</sup> End users may also purchase additional beams, braces, and decking separately (although these items are not prepackaged) to add shelves beyond those that came with the original unit.

### **Applications**

Boltless steel shelving is used for storage in homes, garages, offices, and commercial and industrial operations. Being prepackaged in a limited number of sizes and other specifications, it may not be suitable for certain offices, commercial, and industrial operations requiring more customized shelving.<sup>26</sup> Since boltless steel shelving is designed for functional utility and durability, rather than aesthetic appearance, it is more likely to be utilized in a garage, basement, or back room rather than in a kitchen, living room, or sales display area where wood or other decorative shelving would be preferable (see figure I-1).<sup>27</sup>

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<sup>22</sup> Weight-bearing capacities are determined by the shelving connection design, decking type, and dimensions. The lightest load capacity shelving is slot and tab, followed by rivet, and lastly by welded. The lightest load-bearing decks are particle boards and laminates, with wire decking having the highest load bearing capability. The dimensions and design also determine the weight-bearing capacity of the shelving unit. Petitioner's postconference brief, exh. 1: Declaration of Chris Kruger, p. 11.

<sup>23</sup> Of the five products identified by petitioner as representing a "significant volume of U.S. sales and imports," the product with a 77-inch width has a load weight capacity of 1,000–3,000 pounds per shelf, and the three products with widths of 36 or 48 inches have load weight capacities in the range of 250–1,000 pounds per shelf. Petition, pp. 26–27.

<sup>24</sup> Conference transcript, p. 17 (White).

<sup>25</sup> Add-on kits are considered a small share (far less than 1 percent) of the domestic market for boltless steel shelving. Conference transcript, p. 73 (Morey); petitioner's postconference brief, exh. 1: Declaration of Chris Kruger, p. 11.

<sup>26</sup> Moreover, commonly available finishes for boltless steel shelving are limited to black, red, gray, or silver. Conference transcript, p. 17 (White).

<sup>27</sup> Conference transcript, pp. 17–18 (White).

## Manufacturing processes<sup>28</sup>

There are six major steps to manufacture boltless steel shelving. To begin, 1) hot-rolled, flat carbon steel is slit to widths for producing horizontal beam, brace, and vertical post profiles. Next, 2) the slit steel blanks are successively punched with notch holes and are cut to length, 3) formed to the final shape and profile, 4) painted or coated, and 5) attached with rivets or welded with supports. Finally, 6) the component pieces are packaged together for sale as a complete shelving unit.

The slitting process cuts the steel to the required widths to produce beam and post profiles.<sup>29</sup> Slitting is performed either in-house by the producer, a steel service center, or another third-party processor.<sup>30</sup> Next, the slit steel blanks are fed into presses that punch notch holes and cut the posts, beams, or braces to length. These punched parts are then roll- or press-formed into their final shapes and profiles, that are also sometimes welded. The various profiles for the beams and braces are produced on dedicated machines that cannot be used to produce other profiles, as these machines produce at a constant volume. For higher capacity boltless steel shelving, a small frame with punched or cut-out tabs is welded to each end of the beams. Welding of the front-to-back supports to vertical posts to form end units is also done at this time. The next step is phosphating prior to painting or coating.<sup>31</sup> Phosphating reacts with the steel surface to form iron phosphate, both to enhance surface corrosion resistance and to provide a stronger bonding surface for the subsequent painting or other coating applications.<sup>32</sup>

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<sup>28</sup> Unless noted otherwise, information about the manufacturing process is derived from the petition, vol. I, April 25, 2023, pp. 11–12.

<sup>29</sup> The beams and posts for boltless steel shelving units are typically produced from hot-rolled carbon steel. The most common thicknesses are combinations of 16-gauge and 18-gauge steel, although some thicker 14-gauge steel is still used. Conference transcript, p. 84 (White); petitioner’s postconference brief, exh. 1: Declaration of Chris Kruger, p. 12.

The petitioner is undertaking improvements the manufacturing process to utilize hot-rolled carbon steel for certain complex components in one product instead of more-expensive, cold-rolled carbon steel. Conference transcript, pp. 83–84 (White).

<sup>30</sup> The petitioner purchases hot-rolled carbon steel in coils, that is neither pre-coated nor pre-fabricated, on a spot-price basis from local service centers rather than directly from major steel mills. Conference transcript, pp. 76–77, 79, 83 (White).

<sup>31</sup> Powder coating is a high-quality finish found on many products. Using the process of electrostatic spray deposition (“ESD”), a spray gun generates an electrostatic charge to powdered coating material that then is attracted and coats the target part that is grounded for the charge. The part is then baked in a curing oven to set the surface coating. Powder Coating Institute (“PCI”), “What is Powder Coating?” ©2016, <https://www.powdercoating.org/page/WhatIsPC>, retrieved May 4, 2023.

<sup>32</sup> Boltless steel shelving is commonly available with black, red, gray, or silver finishes. Conference transcript, p. 17 (White).

The posts, beams, and braces are either painted, galvanized, powder coated or enameled, or coated with other materials. Rivets are attached to each end of the beams and braces. The decking is typically sourced from outside vendors. The posts, beams, braces, and decking for a complete shelving unit, as well as the plastic end pieces, center supports and other accessories, and assembly instructions are packaged and labeled for the order and shipped.

Boltless steel shelving producers, whether among the subject trade partners or nonsubject China, rely on this same, or not an otherwise significantly different, manufacturing process.<sup>33</sup>

## **Domestic like product issues**

No issues with respect to domestic like product have been raised in these investigations. The petitioner proposes that the Commission should define the domestic like product to be coextensive with the scope.<sup>34</sup> No respondent party has taken a position with respect to the proposed definition of the domestic like product in this phase.<sup>35</sup>

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<sup>33</sup> Conference transcript, pp. 87–88 (Kruger); Triune’s Staff Conference Responses to Questions, pp. 3–5, exh. Q-4 Triune Production Process Overview for Boltless Shelving.

<sup>34</sup> Petitioner’s postconference brief, p. 5.

<sup>35</sup> Conference transcript, p. 105 (Neeley).



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

### U.S. market characteristics

Boltless steel shelving is a consumer product that is generally sold directly to major big box retailers or home improvement stores like the Home Depot, Lowe's, Costco, Menard's Sam's Club, and Walmart, and are also sold via online retailers like Amazon, HomeDepot.com, Lowe's.com, and other hardware stores like Granger and Ace Hardware.<sup>1</sup> The five major purchasers of boltless steel shelving are \*\*\*.<sup>2</sup>

\*\*\* nine of 11 responding importers indicated that the market was not subject to distinctive conditions of competition. Petitioner Edsal described the boltless steel shelving market as having promotion-driven seasonality, in the July/August range and December through February range, during which retailers promote sales of boltless steel shelving by bringing product to the front of the store for foot traffic and exposure.<sup>3</sup> Importer \*\*\* reported that sales spike in the fourth quarter with a focus towards organization to start the year, and importer \*\*\* reported that customers tend to shop heavily during post-holiday periods, three-day weekends, and fall/spring cleanup.

Apparent U.S. consumption of boltless steel shelving decreased during January 2020 - December 2022. Overall, apparent U.S. consumption in 2022 was \*\*\* percent lower than in 2020. There are two U.S. producers of boltless steel shelving, with the petitioner representing \*\*\* percent of reported production in 2022. Subject imports from Malaysia, Thailand, and Taiwan together accounted for the largest shares of total subject imports during this period.

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<sup>1</sup> Conference transcript, p. 19 (White).

<sup>2</sup> Petitioner Lost Sales and Lost Revenue allegations.

<sup>3</sup> Conference transcript, pp. 59-60 (White) and 64 (Kruger).

## Impact of section 301 tariffs and 232 tariffs

U.S. producers and importers were asked to report the impact of section 301 tariffs and section 232 tariffs on overall demand, supply, prices, or raw material costs (tables II-1 and II-2). Importer \*\*\* reported that section 301 tariffs indirectly affected raw material prices consumed in production, while \*\*\* reported that it increased prices and shifted production to other countries. U.S. producer \*\*\* reported that while input costs increased, it was only able to pass partial price increases onto its customers due to import competition. Importer \*\*\* reported that section 301 tariffs allowed Edsal to enjoy a “near monopoly” on retail packaged boltless shelving in the United States. With regard to section 232 tariffs, importers \*\*\* reported increased prices, and \*\*\* reported that manufacturing moved to countries of origin without a tariff.

**Table II-1**

**Boltless steel shelving: Count of firms' responses regarding the impact of the 301 tariffs on Chinese origin products**

Firm type	Yes	No	Don't know
U.S. producers	***	***	***
Importers	4	3	4

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

**Table II-2**

**Boltless steel shelving: Count of firms' responses regarding the impact of the 232 tariffs on steel and aluminum imports**

Firm type	Yes	No	Don't know
U.S. producers	***	***	***
Importers	3	2	6

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

## Channels of distribution

U.S. producers and importers sold mainly to retailers, as shown in table II-3. Importers of Thai boltless steel shelving sold \*\*\* percent of U.S. shipments to distributors in 2020, but \*\*\* of U.S. shipments by 2022 were sold to retailers.

**Table II-3****Boltless steel shelving: Share of U.S. shipments by source, channel of distribution, and period**

Shares in percent

Source	Channel	2020	2021	2022
United States	Distributors	***	***	***
United States	End users	***	***	***
United States	Retailers	***	***	***
India	Distributors	***	***	***
India	End users	***	***	***
India	Retailers	***	***	***
Malaysia	Distributors	***	***	***
Malaysia	End users	***	***	***
Malaysia	Retailers	***	***	***
Taiwan	Distributors	***	***	***
Taiwan	End users	***	***	***
Taiwan	Retailers	***	***	***
Thailand	Distributors	***	***	***
Thailand	End users	***	***	***
Thailand	Retailers	***	***	***
Vietnam	Distributors	***	***	***
Vietnam	End users	***	***	***
Vietnam	Retailers	***	***	***
Subject	Distributors	***	***	***
Subject	End users	***	***	***
Subject	Retailers	***	***	***
Nonsubject	Distributors	***	***	***
Nonsubject	End users	***	***	***
Nonsubject	Retailers	***	***	***
All imports	Distributors	***	***	***
All imports	End users	***	***	***
All imports	Retailers	***	***	***

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

## Geographic distribution

U.S. producers and importers<sup>4</sup> reported selling boltless steel shelving from most subject sources to all regions in the contiguous United States (table II-2).<sup>5</sup> For U.S. producers, \*\*\* percent of sales were within 100 miles of their production facility, \*\*\* percent were between 101 and 1,000 miles, and \*\*\* percent were over 1,000 miles. Importers sold \*\*\* percent within 100 miles of their U.S. point of shipment, \*\*\* percent between 101 and 1,000 miles, and \*\*\* percent over 1,000 miles.

**Table II-2**  
**Boltless steel shelving: Count of U.S. producers' and U.S. importers' geographic markets**

Region	U.S. producers	India	Malaysia	Taiwan	Thailand	Vietnam	Subject sources
Northeast	***	0	1	0	2	3	3
Midwest	***	0	1	0	2	3	3
Southeast	***	0	1	0	2	3	3
Central Southwest	***	0	1	0	1	3	3
Mountain	***	0	1	0	2	3	3
Pacific Coast	***	0	2	0	2	4	4
Other	***	0	0	0	0	2	2
All regions (except Other)	***	0	1	0	1	3	3
Reporting firms	2	0	2	0	2	4	4

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

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

<sup>4</sup> These importers were those that reported commercial shipments of imported boltless steel shelving.

<sup>5</sup> No importers reported shipments of product from India or Taiwan.

## Supply and demand considerations

### U.S. supply

Table II-3 provides a summary of the supply factors regarding boltless steel shelving from U.S. producers and from subject countries. Domestic capacity was nearly \*\*\* the combined subject country capacity in 2022. India and Thailand entered the boltless steel shelving market in 2022.

**Table II-3**  
**Boltless steel shelving: Supply factors that affect the ability to increase shipments to the U.S. market, by country**

Quantity in units; ratio and share in percent; count in number of firms reporting.

Factor	Measure	United States	India	Malaysia	Taiwan	Thailand	Vietnam
Capacity 2020	Quantity	***	***	***	***	***	***
Capacity 2022	Quantity	***	***	***	***	***	***
Capacity utilization 2020	Ratio	***	***	***	***	***	***
Capacity utilization 2022	Ratio	***	***	***	***	***	***
Inventories to total shipments 2020	Ratio	***	***	***	***	***	***
Inventories to total shipments 2022	Ratio	***	***	***	***	***	***
Home market shipments 2022	Share	***	***	***	***	***	***
Non-US export market shipments 2022	Share	***	***	***	***	***	***
Ability to shift production (firms reporting "yes")	Count	***	***	***	***	***	***

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

Note: Responding U.S. producers accounted for all of U.S. production of boltless steel shelving in 2022. Responding foreign producer/exporter firms accounted for all of U.S. imports of boltless steel shelving from India, no foreign producer questionnaires were received from Malaysia, all imports from Taiwan, less than half of imports from Thailand, and less than half of imports from Vietnam during 2022. 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 VI.

## **Domestic production**

Based on available information, U.S. producers of boltless steel shelving have the ability to respond to changes in demand with large changes in the quantity of shipments of U.S.-produced boltless steel shelving to the U.S. market. The main contributing factors to this degree of responsiveness of supply is the availability of unused capacity and inventories.

Capacity decreased by \*\*\* percent and production decreased by \*\*\* percent between 2020 and 2022. Ending inventories as a ratio to total shipments in 2022 were \*\*\* percentage points lower than in 2020. U.S. producer \*\*\* as a principal export market; \*\*\*. \*\*\* reported that \*\*\*.

## **Subject imports from India**

Based on available information, the one producer of boltless steel shelving from India has the ability to respond to changes in demand with \*\*\* changes in the quantity of shipments of boltless steel shelving to the U.S. market. The main contributing factors to this degree of responsiveness of supply include the ability to increase capacity and the ability to shift production to or from alternate products. Factors mitigating responsiveness of supply include limited capacity and limited availability of unused capacity and inventories.

Triune, the only producer and exporter of Indian boltless steel shelving, started production in late October 2021 and entered the boltless steel shelving market in 2022.<sup>6</sup> Triune primarily produces a 77-inch by 24-inch four-level welded deck.<sup>7</sup> Triune's manufacturing plant of boltless steel shelving in India is designed to manufacture a various range of products apart from shelving.<sup>8</sup> Other products that Triune reportedly can produce on the same equipment as boltless steel shelving are \*\*\*. Factors affecting Triune's ability to shift production include \*\*\*.

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<sup>6</sup> Triune's postconference brief, p. 17.

<sup>7</sup> Conference transcript, p. 125 (Cannon).

<sup>8</sup> Conference transcript, pp. 96-98 (Miranda and Nagarajan).

### **Subject imports from Malaysia**

No producers from Malaysia responded to the foreign producers' questionnaire. Based on limited available information, producers of boltless steel shelving from Malaysia have the ability to respond to changes in demand with moderate changes in the quantity of shipments of boltless steel shelving to the U.S. market. U.S. importers' inventories of boltless steel shelving from Malaysia increased by \*\*\* percent between 2020 and 2022.

### **Subject imports from Taiwan**

Based on available information, \*\*\*, the one responding producer of boltless steel shelving from Taiwan, has the ability to respond to changes in demand with small to moderate changes in the quantity of shipments of boltless steel shelving to the U.S. market. The main contributing factors to this degree of responsiveness of supply are limited availability of unused capacity, minimal inventories, and steady capacity. Factors mitigating responsiveness of supply include comparatively large capacity.

Capacity remained steady between 2020 and 2022, while production decreased, resulting in a \*\*\* percentage point increase in capacity utilization. Other principal export markets include \*\*\*. Other products that the one responding foreign producer reportedly can produce on the same equipment as boltless steel shelving is \*\*\*. Factors affecting its ability to shift production include \*\*\*.

### **Subject imports from Thailand**

Based on available information, the one responding producer of boltless steel shelving from Thailand has the ability to respond to changes in demand with \*\*\* changes in the quantity of shipments of boltless steel shelving to the U.S. market. The main contributing factors to this degree of responsiveness of supply is the ability to increase production. Factors mitigating responsiveness of supply include no available capacity or ability to shift production to or from alternate products. \*\*\*.

## **Subject imports from Vietnam**

Based on available information, producers of boltless steel shelving from Vietnam have the ability to respond to changes in demand with \*\*\* changes in the quantity of shipments of boltless steel shelving to the U.S. market. The main contributing factor to this degree of responsiveness of supply is the availability of unused capacity.

## **Imports from nonsubject sources**

Nonsubject imports accounted for \*\*\* percent of total U.S. imports in 2022. The largest sources of nonsubject imports during January 2020 - December 2022 were China, Canada, and Slovakia.

## **Supply constraints**

\*\*\* and eight of 10 responding importers reported that they had not experienced supply constraints since January 1, 2020. \*\*\* reported that certain vendors were unable to supply its unit demands in 2020 and 2021.

## **U.S. demand**

Based on available information, the overall demand for boltless steel shelving is likely to experience moderate-to-large changes in response to changes in price. The main contributing factors are the limited range of substitute products and that it is a final consumer good.

## **End uses and cost share**

Boltless steel shelving is a final consumer good. It is sold prepackaged in a kit, ready for assembly and installation by the consumer. U.S. producers and importers listed various end uses, including commercial storage, garage storage, home improvement, industrial storage, office storage, and storage organization. As a final consumer good, boltless steel shelving accounts for all of the cost of a finished good.

## **Business cycles**

Both U.S. producers and nine of 11 responding importers indicated that the market was not subject to business cycles. However, a representative for U.S. producer Edsal reported that its business operates at a “promotion-driven seasonality”, with a July/August range and a December/January/February range, during which retailers promote the category aggressively.<sup>9</sup>

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<sup>9</sup> Conference transcript, pp. 59-60 (White).



Out of the two firms that reported the market was subject to business cycles, \*\*\* reported that sales spike in the last quarter with a focus toward organization to start the year, and \*\*\* reported that customers tend to shop heavily for storage solutions during post-holiday periods, three-day weekends, and fall and spring cleanup. Out of the two firms reporting that the boltless steel shelving market was subject to distinctive conditions of competition, importer \*\*\* reported Edsal's product recall in 2020 as a distinctive condition of competition, while \*\*\* reported that retail pricing affects customer purchasing decisions and therefore retail pricing fluctuates throughout the year.

### **Demand trends**

In March 2020 and the beginning of the COVID-19 pandemic, Petitioner Edsal kept its retail shelving business open after hardware stores and suppliers were deemed essential businesses by state and local governments. Edsal's industrial/non-retail business, which represented 15 to 20 percent of its business, saw a sharp falloff in demand before increasing its retail shelving sales after ramping up domestic manufacturing by almost 60 percent. Edsal attributed strong demand to garage organization and cleanup projects during the lockdown, after which demand "tailed off" in 2022.<sup>10</sup> Four importers reported that that U.S. demand for boltless steel shelving had fluctuated up since January 1, 2020, and three reported that demand had fluctuated down (table II-4). U.S. producer \*\*\* reported that sales decreased over the last year. Out of the importers that reported that demand had fluctuated downward since 2020, \*\*\* reported that demand spiked during the COVID-19 pandemic but has since returned to pre-pandemic levels, \*\*\* reported that sales increased in 2020 and 2021 before remaining steady in 2022 and fluctuating down in 2023, and \*\*\* reported that there has been a post-pandemic sales slump and that inflation has impacted sales. Out of the importers that reported that demand has fluctuated upwards since 2020, \*\*\* and \*\*\* reported that the COVID-19 pandemic caused a surge in sales/increased demand for home-improvement retailers, while \*\*\* reported that demand increased during the COVID-19 pandemic but decreased recently and cited increased material costs and increased prices.

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<sup>10</sup> Monomoy Capital Partners, "Home Improvement Outlook COVID-19 Edition – Interview with Scott White, CEO of Edsal," July 7, 2020, and conference transcript, pp. 15 and 59 (White).

**Table II-4**

**Boltless steel shelving: Count of firms' responses regarding overall domestic and foreign demand, by firm type**

Market	Firm type	Steadily Increase	Fluctuate Up	No change	Fluctuate Down	Steadily Decrease	Fluctuate
Domestic demand	U.S. producers	***	***	***	***	***	***
Domestic demand	Importers	0	4	2	3	1	0
Foreign demand	U.S. producers	***	***	***	***	***	***
Foreign demand	Importers	0	0	1	1	1	0

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

### **Substitute products**

Substitutes for boltless steel shelving are limited. \*\*\* and eight of 11 responding importers reported that there are no substitutes for boltless steel shelving. Importer \*\*\* reported that wire shelving and pallet racks are substitutes, while \*\*\* reported that plastic shelving for storage organization is a substitute, although they are not interchangeable because their performances differ due to the lower load strength of plastic shelving, and \*\*\* reported that bolted steel shelving was a substitute for boltless steel shelving. All three importers reported that changes in the price of these substitutes have not affected the price for boltless steel shelving.

## **Substitutability issues**

This section assesses the degree to which U.S.-produced boltless steel shelving and imports of boltless steel shelving from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of boltless steel shelving 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 boltless steel shelving and boltless steel shelving imported from subject sources.<sup>11</sup> Factors contributing to this level of substitutability include interchangeability between domestic and subject sources. Factors reducing substitutability include reported quality differences, different lead times from domestic versus subject sources, and purchaser preferences for boltless steel shelving from subject sources over other sources.

## **Factors affecting purchasing decisions**

Purchasers responding to lost sales and lost revenue allegations<sup>12</sup> were asked to identify the main purchasing factors their firm considered in their purchasing decisions for boltless steel shelving. Purchasing factors identified by firms include the ability to provide adequate quantity, availability, consistency of supply, cost/pricing, quality, supplier stability, and value.

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<sup>11</sup> The degree of substitution between domestic and imported boltless steel shelving depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced boltless steel shelving to the boltless steel shelving 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.).

<sup>12</sup> This information is compiled from responses by purchasers identified by Petitioners to the lost sales lost revenue allegations. See Part V for additional information.

## Most important purchase factors

The most often cited top three factors firms consider in their purchasing decisions for boltless steel shelving were quality (6 firms), cost (5 firms), and availability and reliability (2 firms each) as shown in table II-6. Quality was the most frequently cited first-most important factor (cited by 4 firms), cost was the most frequently reported second-most important factor (5 firms); and availability/supply/reliability and quality were equally reported as the third-most important factor (2 firms each). Other factors reported as the third-most important factor were efficiency of the factory and competency to adjust depending upon inventory requirements reported by \*\*\* and estimated unit velocity of product (turnaround in stores), reported by \*\*\*.

**Table II-6**  
**Boltless steel shelving: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor**

Factor	First	Second	Third	Total
Quality	4	0	2	6
Price / Cost	0	5	0	5
Availability / Supply/ Reliability	1	0	2	3
All other factors	1	1	2	NA

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

## Lead times

U.S. producers reported that \*\*\* percent of their commercial shipments were from inventories, with lead times averaging \*\*\* days. The remaining \*\*\* percent of their commercial shipments came from inventories, with lead times averaging \*\*\* days. U.S. importers reported that \*\*\* percent of their commercial shipments were from inventories, with lead times averaging \*\*\* days. The remaining \*\*\* percent of commercial shipments were produced-to-order, with lead times averaging \*\*\* days.

## Comparison of U.S.-produced and imported boltless steel shelving

In order to determine whether U.S.-produced boltless steel shelving can generally be used in the same applications as imports from India, Malaysia, Taiwan, Thailand, and Vietnam, U.S. producers and importers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables II-11 and II-12, \*\*\* reported that boltless steel shelving can always be used interchangeably across sources, while all U.S. importers reported that boltless steel shelving can either \*\*\* or \*\*\* be used interchangeably across sources.

**Table II-11**

**Boltless steel shelving: Count of U.S. producers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. India	***	***	***	***
U.S. vs. Malaysia	***	***	***	***
U.S. vs. Taiwan	***	***	***	***
U.S. vs. Thailand	***	***	***	***
U.S. vs. Vietnam	***	***	***	***
U.S. vs. other	***	***	***	***
India vs. Malaysia	***	***	***	***
India vs. Taiwan	***	***	***	***
India vs. Vietnam	***	***	***	***
Malaysia vs. Taiwan	***	***	***	***
Malaysia vs. Thailand	***	***	***	***
Malaysia vs. Vietnam	***	***	***	***
Taiwan vs. Thailand	***	***	***	***
Thailand vs. Vietnam	***	***	***	***
India vs. Other	***	***	***	***
Malaysia vs. Other	***	***	***	***
Taiwan vs. Other	***	***	***	***
Thailand vs. Other	***	***	***	***
Vietnam vs. Other	***	***	***	***

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

**Table II-12**

**Boltless steel shelving: Count of importers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. India	2	0	0	0
U.S. vs. Malaysia	2	4	0	0
U.S. vs. Taiwan	2	2	0	0
U.S. vs. Thailand	2	1	0	0
U.S. vs. Vietnam	3	3	0	0
India vs. Malaysia	2	1	0	0
India vs. Taiwan	2	0	0	0
India vs. Thailand	1	0	0	0
India vs. Vietnam	1	0	0	0
Malaysia vs. Taiwan	2	1	0	0
Malaysia vs. Thailand	1	0	0	0
Malaysia vs. Vietnam	1	2	0	0
Taiwan vs. Thailand	2	0	0	0
Taiwan vs. Vietnam	1	1	0	0
Thailand vs. Vietnam	3	0	0	0
U.S. vs. Other	2	0	0	0

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

In addition, U.S. producers and importers were asked to assess how often differences other than price were significant in sales of boltless steel shelving from the United States, subject, or nonsubject countries. As seen in tables II-13 to II-14, most \*\*\* importers reported that differences other than price were never significant in sales of boltless steel shelving regardless of source. Importer \*\*\* reported that quality, capacity, continuity of supply, service, and assortment breadth as differences other than price, while \*\*\* reported quality as a difference other than price between boltless steel shelving from the United States and Taiwan and the United States and Thailand. Purchaser \*\*\* reported that it had concerns around quality with Edsal due to its product recall in 2020. This voluntary recall was for 2.2 million shelving units of Edsal's boltless steel shelving and was announced on February 10, 2021 and consisted of \*\*\* of muscle rack heavy duty steel shelving units that were stated to support an 800-pound weight load.<sup>13</sup> \*\*\*

<sup>13</sup> United States Consumer Product Safety Commission. "Edsal Recalls 2.2 Million Shelving Units Due to Injury Hazard.", <https://www.cpsc.gov/Recalls/2021/Edsal-Recalls-2-2-Million-Shelving-Units-Due-to-Injury-Hazard>, retrieved May 25, 2023 and Edsal's postconference brief p. 7 and Attachments 3 and 4.

“\*\*\*. According to importer Jaken, Edsal’s product recall resulted in the loss of business from Lowe’s and Walmart.”<sup>14</sup>

**Table II-13**  
**Boltless steel shelving: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair**

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. India	***	***	***	***
U.S. vs. Malaysia	***	***	***	***
U.S. vs. Taiwan	***	***	***	***
U.S. vs. Thailand	***	***	***	***
U.S. vs. Vietnam	***	***	***	***
India vs. Malaysia	***	***	***	***
India vs. Taiwan	***	***	***	***
India vs. Thailand	***	***	***	***
India vs. Vietnam	***	***	***	***
Malaysia vs. Taiwan	***	***	***	***
Malaysia vs. Thailand	***	***	***	***
Malaysia vs. Vietnam	***	***	***	***
Taiwan vs. Thailand	***	***	***	***
Taiwan vs. Vietnam	***	***	***	***
Thailand vs. Vietnam	***	***	***	***
U.S. vs. Other	***	***	***	***
India vs. Other	***	***	***	***
Malaysia vs. Other	***	***	***	***
Taiwan vs. Other	***	***	***	***
Thailand vs. Other	***	***	***	***
Vietnam vs. Other	***	***	***	***

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

<sup>14</sup> Jaken nonparty statement, May 19, 2023, pp. 2-3.

**Table II-14**

**Boltless steel shelving: Count of importers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair**

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. India	0	0	1	1
U.S. vs. Malaysia	1	1	2	2
U.S. vs. Taiwan	1	0	2	1
U.S. vs. Thailand	1	1	0	1
U.S. vs. Vietnam	1	1	1	3
India vs. Malaysia	0	1	0	1
India vs. Taiwan	0	0	1	1
India vs. Thailand	0	0	0	1
India vs. Vietnam	0	0	0	1
Malaysia vs. Taiwan	0	0	1	1
Malaysia vs. Thailand	0	0	0	1
Malaysia vs. Vietnam	0	0	1	1
Taiwan vs. Thailand	0	0	0	2
Taiwan vs. Vietnam	0	0	1	2
Thailand vs. Vietnam	0	1	0	2
U.S. vs. Other	0	1	1	2
India vs. Other	0	0	0	2
Malaysia vs. Other	0	0	1	1
Taiwan vs. Other	0	0	1	1
Thailand vs. Other	0	0	0	1
Vietnam vs. Other	0	0	1	2

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



## **Part III: U.S. producers' production, shipments, and employment**

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the dumping margins was presented in Part I of this report and information on the volume and pricing of imports of the subject merchandise is presented in Part IV and Part V. Information on the other factors specified is presented in this section and/or Part VI and (except as noted) is based on the questionnaire responses of two firms that accounted for all U.S. production of boltless steel shelving during 2022.

### **U.S. producers**

The Commission issued a U.S. producer questionnaire to two firms based on information contained in the petition. Both firms provided usable data on their operations. Staff believes that these responses represent all U.S. production of boltless steel shelving in 2022.<sup>1</sup>

Table III-1 lists U.S. producers of boltless steel shelving, their production locations, positions on the petition, and shares of total production.

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<sup>1</sup> The petitioner, Edsal, is the largest U.S. producer of boltless steel shelving, and it claims that the only other domestic producer is Tennsco Corp. ("Tennsco"). Edsal notes that \*\*\*. Petition, p. 2. Petitioner's counsel also notes that there have been "no new entrants into the domestic industry". Conference transcript, p. 6 (Morey).

**Table III-1**

**Boltless steel shelving: U.S. producers, their positions on the petition, production locations, and shares of reported production, 2022**

Share in percent

Firm	Position on petition	Production location(s)	Share of production
Edsal	Petitioner	Chicago, IL Gary, IN Littlestown, PA Bloomington, CA	***
Tennsco	***	Dickson, TN	***
All firms	Various	Various	***

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

Table III-2 presents information on U.S. producers' ownership, related and/or affiliated firms.<sup>2</sup>

**Table III-2**

**Boltless steel shelving: U.S. producers' ownership, related and/or affiliated firms**

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

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

As indicated in table III-2, no U.S. producers are related to foreign producers of the subject merchandise or U.S. importers of the subject merchandise. In addition, as discussed in greater detail below, one U.S. producer directly imports the subject merchandise and no U.S. producers purchase the subject merchandise from U.S. importers.

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<sup>2</sup> \*\*\*.

Table III-3 presents events in the U.S. industry since January 1, 2020.

**Table III-3**  
**Boltless steel shelving: Important industry events since January 1, 2020**

Item	Firm	Event
Product recall	Edsal	February 2021— Edsal recalled 2.2 million units of its 5-Tier Muscle Rack Heavy Duty Steel Shelving Units after reports of the shelving failing to support the 800-pound weight load as stated on the packaging. Refunds were offered for the \$80–90 price on purchases of this item from home-improvement store Lowes and major on-line retailers between January 2015 through September 2020.
Property acquisition	Tennsco	October 2022— The City Council of Dickson, Tennessee, approved an ordinance authorizing the sale of a development trust property to Tennsco that it has been leasing for \$600 annually over the past 60 years. Under the 1962 lease agreement, Tennsco can purchase the property after January 1, 1972, for \$3,000. The leased property is the location for Plant 1, which is one of three that manufactures Tennsco's Z-Line Boltless Rivet Shelving along with various other types of steel storage and filing units.
Plant closure	Edsal	March 2023— Edsal closed its packaging facility for riveted and welded boltless steel shelving in Bloomington, California, claiming that “{w}e were forced to close that facility, due to the declines in our U.S. sales, driven by the unfair imports.”

Source: U.S. Consumer Product Safety Commission (“CPSC”), “Edsal Recalls 2.2 Million Shelving Units Due to Injury Hazard,” recall No. 21-076, February 10, 2021, <https://www.cpsc.gov/Recalls/2021/Edsal-Recalls-2-2-Million-Shelving-Units-Due-to-Injury-Hazard>;

Jaken nonparty, statement May 19, 2023, pp. 1–3;

Source Staff, “Dickson City Council Approves Sale of Property to Tennsco,” Dickson County Source, October 10, 2022, <https://dicksoncountysource.com/council-approves-sale-of-property-to-tennsco/>;

Tennsco, “Manufacturing Capabilities” web page, 2023, <https://www.tennsco.com/manufacturercapabilities>, retrieved May 24, 2023;

Tennsco, “Shelving” web page, 2023, <https://www.tennsco.com/Category/shelving>, retrieved May 24, 2023;

Conference transcript, p. 13, 48, 90 (White); and

Jaken nonparty statement, May 19, 2023, p. 5.

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of boltless steel shelving since January 1, 2020. One U.S. producer indicated in their questionnaires that they had experienced such changes. Table III-4 presents the changes identified by this producer.

**Table III-4****Boltless steel shelving: U.S. producers' reported changes in operations, since January 1, 2020**

Item	Firm name and narrative response on changes in operations
Plant closings	***

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

## U.S. production, capacity, and capacity utilization

Table III-5 presents U.S. producers' installed overall capacity, practical overall capacity, and practical boltless steel shelving capacity and production on the same equipment. Installed capacity remained constant from 2020-22 while practical overall capacity declined by \*\*\* percent. As total overall production declined by \*\*\* percent from 2020-22, installed overall capacity utilization and practical overall capacity utilization declined over the same period by \*\*\* and \*\*\* percentage points, respectively.

Practical capacity to produce boltless steel shelving declined by \*\*\* percent from 2020-22, while boltless steel shelving production declined by \*\*\* percent over the same period, resulting in a decline in boltless steel shelving capacity utilization of \*\*\* percentage points.<sup>3</sup>

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<sup>3</sup> From 2020-22, Edsal reported a consistent installed overall capacity of \*\*\* units, but declining practical overall capacity of \*\*\* units to \*\*\* units from 2020-22. The firm's practical boltless steel shelving capacity declined from \*\*\* units to \*\*\* units from 2020-2022. (In its questionnaire response, the firm additionally stated that \*\*\*.The firm reported that at least \*\*\* percent of its production on the same machinery was of boltless steel shelving in any period (see table III-8 below).

From 2020-22, Tennsco reported consistent overall capacities of \*\*\* units and \*\*\* units for installed and practical overall capacity, respectively, and constant practical boltless steel shelving capacity of \*\*\* units from 2020-2022. The firm reported that only \*\*\* percent of its production on the same machinery was of boltless steel shelving in any period (see table III-8 below).

**Table III-5**

**Boltless steel shelving: U.S. producers' installed and practical capacity, production, and utilization on the same equipment as subject production, by period**

Capacity and production in units; utilization in percent

Item	Measure	2020	2021	2022
Installed overall	Capacity	***	***	***
Installed overall	Production	***	***	***
Installed overall	Utilization	***	***	***
Practical overall	Capacity	***	***	***
Practical overall	Production	***	***	***
Practical overall	Utilization	***	***	***
Practical boltless steel shelving	Capacity	***	***	***
Practical boltless steel shelving	Production	***	***	***
Practical boltless steel shelving	Utilization	***	***	***

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

Table III-6 presents U.S. producers' reported narratives regarding practical capacity constraints.<sup>4</sup>

**Table III-6**

**Boltless steel shelving: U.S. producers' reported capacity constraints since January 1, 2020**

Item	Firm name and narrative response on constraints to practical overall capacity
Production bottlenecks	***
Existing labor force	***
Supply of material inputs	***
Logistics/transportation	***

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

Table III-7 and figure III-1 present U.S. producers' production, capacity, and capacity utilization.

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<sup>4</sup> Edsal reported \*\*\* capacity constraints in its questionnaire response. At the conference, a company representative explained that the firm has "significant installed capacity" and the "ability and willingness to go beyond that installed capacity". Conference transcript, p. 47 (White). Further, Edsal explained in its brief that while its practical capacity declined from 2020-22, "that is merely a function of Edsal's workforce being reduced as it lost sales to subject imports". Edsal claims that "if the business is there" it can quickly ramp up production to its installed capacity level, citing the 100 workers the firm hired in December 2022 to meet seasonal demand. Edsal's postconference brief, p. 8.

**Table III-7**  
**Boltless steel shelving: Firm-by-firm capacity, by period**

**Capacity**

Capacity in units

Firm	2020	2021	2022
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.

**Table III-7 Continued**  
**Boltless steel shelving: Firm-by-firm production, by period**

**Production**

Production in units

Firm	2020	2021	2022
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.

**Table III-7 Continued**  
**Boltless steel shelving: Firm-by-firm capacity utilization, by period**

**Capacity utilization**

Capacity utilization in percent

Firm	2020	2021	2022
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.

**Table III-7 Continued**  
**Boltless steel shelving: Firm-by-firm share of production, by period**

**Share of production**

Share in percent

Firm	2020	2021	2022
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

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

**Figure III-1**

**Boltless steel shelving: 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-8, \*\*\* percent of the product produced during 2022 by U.S. producers was boltless steel shelving. Both U.S. producers reported producing alternative products on the same equipment used to produce boltless steel shelving. Edsal reported producing \*\*\* in addition to boltless steel shelving, while Tennsco reported producing \*\*\*. While both firms reported declining production of boltless steel shelving from 2020-22 (see table III-7), Tennsco's production of other products (which constituted \*\*\* percent of its total production in all periods) increased \*\*\* percent from 2020-22, from \*\*\* units to \*\*\* units. Edsal's production of other products (which constituted between \*\*\* and \*\*\* percent of its total production in all periods) decreased \*\*\* percent from 2020-22, from \*\*\* units to \*\*\* units.

**Table III-8**

**Boltless steel shelving: U.S. producers' overall production on the same equipment as subject production, by product type and period**

Quantity in units; share in percent

Product type	Measure	2020	2021	2022
Boltless Steel Shelving	Quantity	***	***	***
Other products	Quantity	***	***	***
All products	Quantity	***	***	***
Boltless Steel Shelving	Share	***	***	***
Other products	Share	***	***	***
All products	Share	***	***	***

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

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

Table III-9 presents U.S. producers' U.S. shipments, export shipments, and total shipments. U.S. shipments by quantity decreased by \*\*\* percent from 2020-22, however U.S. shipment unit values increased by \*\*\* percent over the same period. Export shipments by quantity decreased by \*\*\* percent from 2020-22, and export shipment unit values increased by \*\*\* percent over the same period, however export shipments were no more than \*\*\* percent of total shipments in any period. Edsal \*\*\* reporting exports, primarily to \*\*\*. \*\*\* reported internal consumption of boltless steel shelving or any transfers to related firms.

**Table III-9**

**Boltless steel shelving: U.S. producers' total shipments, by destination and period**

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

Item	Measure	2020	2021	2022
U.S. shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
U.S. shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***
U.S. shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
U.S. shipments	Share of quantity	***	***	***
Export shipments	Share of quantity	***	***	***
Total shipments	Share of quantity	***	***	***
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-10 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. Inventories held by U.S. producers declined irregularly by \*\*\* percent from 2020-22. As a ratio to U.S. production and U.S. shipments, inventories increased by \*\*\* percentage points (though at different beginning and ending period ratios).

**Table III-10**  
**Boltless steel shelving: U.S. producers' inventories and their ratio to select items, by period**

Quantity in units; ratio in percent

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

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

## U.S. producers' imports from subject sources

U.S. producers' imports of boltless steel shelving are presented in table III-11. Edsal reported importing from \*\*\*. Its ratio of imports from subject sources to U.S. production was \*\*\* percent in 2020, declining to \*\*\* percent in 2021 and 2022. Table III-12 presents Edsal's reasons for importing.

**Table III-11**  
**Boltless steel shelving: Edsal's U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity in units; ratio in percent

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

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

**Table III-12****Boltless steel shelving: U.S. producers' reasons for importing**

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

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

## U.S. employment, wages, and productivity

Table III-13 shows U.S. producers' employment-related data. The number of PRWs declined by \*\*\* percent from 2020-22, with total hours worked and hours worked per PRW declining by \*\*\* percent and \*\*\* percent, accordingly. Wages paid declined by \*\*\* percent from 2020-22, however hourly wages increased by \*\*\* percent from 2020-22. Productivity declined by \*\*\* percent while unit labor costs increased by \*\*\* percent.<sup>5</sup>

**Table III-13****Boltless steel shelving: U.S. producers' employment related information, by period**

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

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

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<sup>5</sup> Tensco reported a consistent level of \*\*\* PRWs over the period, and explained further that \*\*\*. Email from \*\*\*, May 17, 2023.

Though Edsal reported a declining trend in its count of PRWs, the firm noted that it hired "an additional 100 workers across our facilities...in late '22, when business picked up for a few months, driven by holiday promotions at a key retailer." Conference transcript, pp. 15-16 (White). Edsal noted that about \*\*\* percent of its workforce is dedicated to manufacturing while \*\*\* percent is dedicated to packing/distribution, but "these figures can fluctuate throughout the year." Petitioner's postconference brief, exh. 1., p. 10.

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

### U.S. importers

The Commission issued importer questionnaires to 95 firms believed to be importers of subject boltless steel shelving, as well as to all U.S. producers of boltless steel shelving.<sup>1</sup> Usable questionnaire responses were received from 11 companies, representing \*\*\* percent of U.S. imports from the subject countries in 2022 under HTS subheading 9403.20.0075.<sup>2</sup> Table IV-1 lists all responding U.S. importers of boltless steel shelving from the subject countries and other sources, their locations, and their shares of U.S. imports, in 2022.

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<sup>1</sup> The Commission issued questionnaires to those firms identified in the petition, along with firms identified from staff research as potential importers, or who submitted importers' questionnaires in recent investigations involving similar merchandise from China.

<sup>2</sup> Shares by source are provided in Part 1. Though this HTS number was developed after imposition of the AD/CVD orders on boltless steel shelving from China to encompass the in-scope merchandise, there appear to be misclassification issues in several areas. Petitioner's counsel at the staff conference stated that "...the Commission's 484 Committee established the new statistical breakout under 9403.20, and that breakout is intended to be specific exclusively to in-scope merchandise. However, based on Edsal's own market intelligence, which includes sort of really good visibility into the marketplace, if you look at the volumes, it's very clear that there's significant misclassifications." Conference transcript, pp. 39-40 (Morey). Petitioner asserts that entries into the U.S. under this HTS number from Canada, China, Mexico, and South Korea, which combined account for 95.5 percent of nonsubject imports reported in official import statistics in 2022, are misclassified. Petition, pp. 12-13.

Additionally, Indian producer Triune reports in its brief that official import statistics "...records a total volume of imports from India of 75,030 units during the period of April 2022 through March 2023. To the best of its knowledge, Triune was the only producer and exporter of {boltless steel shelving} in India in 2022 and 2023 and imports from Triune \*\*\* units during the negligibility period. \*\*\*, that would be {the} total volume imported from India during the negligibility period." Triune's postconference brief, p. 8. (\*\*\*. Email from \*\*\* to Commission staff, May 18, 2023.)

Further, U.S. importer \*\*\*. Email from \*\*\* to Commission staff, May 30 and May 31, 2023.

**Table IV-1**

**Boltless steel shelving: U.S. importers, their headquarters, and share of reported total imports within each source, 2022**

Share in percent

<b>Firm</b>	<b>Headquarters</b>	<b>India</b>	<b>Malaysia</b>	<b>Taiwan</b>	<b>Thailand</b>	<b>Vietnam</b>
Amazon	Seattle, WA	***	***	***	***	***
Bi-Mart	Eugene, OR	***	***	***	***	***
Costco	Issaquah, WA	***	***	***	***	***
Edsal	Chicago, IL	***	***	***	***	***
Global	Port Washington, NY	***	***	***	***	***
Home Depot	Atlanta, GA	***	***	***	***	***
Jaken	Tustin, CA	***	***	***	***	***
Lowe's	Mooresville, NC	***	***	***	***	***
Northern Tool	Burnsville, MN	***	***	***	***	***
Walmart	Bentonville, AR	***	***	***	***	***
Whalen	San Diego, CA	***	***	***	***	***
All firms	Various	***	***	***	***	***

Table continued.

**Table IV-1 Continued**

**Boltless steel shelving: U.S. importers, their headquarters, and share of reported total imports within each source, 2022**

Share in percent

<b>Firm</b>	<b>Headquarters</b>	<b>Subject sources</b>	<b>Nonsubject sources</b>	<b>All import sources</b>
Amazon	Seattle, WA	***	***	***
Bi-Mart	Eugene, OR	***	***	***
Costco	Issaquah, WA	***	***	***
Edsal	Chicago, IL	***	***	***
Global	Port Washington, NY	***	***	***
Home Depot	Atlanta, GA	***	***	***
Jaken	Tustin, CA	***	***	***
Lowe's	Mooresville, NC	***	***	***
Northern Tool	Burnsville, MN	***	***	***
Walmart	Bentonville, AR	***	***	***
Whalen	San Diego, CA	***	***	***
All firms	Various	***	***	***

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

## U.S. imports

Table IV-2 and figure IV-1 present data for U.S. imports of boltless steel shelving from the subject countries and all other sources. Imports from subject sources by quantity increased by 18.2 percent from 2020-22, while imports from subject sources by value increased by 57.8 percent, resulting in an increase in unit values of 33.5 percent. Imports from nonsubject sources by quantity increased by \*\*\* percent from 2020-22, while imports from nonsubject sources by value increased by \*\*\* percent, resulting in an increase in unit values of \*\*\* percent. As a share of all imports, imports from subject sources decreased by \*\*\* percentage points from 2020-22.<sup>3</sup>

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<sup>3</sup> \*\*\*.  
\*\*\*.

**Table IV-2**  
**Boltless steel shelving: U.S. imports by source and period**

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

Source	Measure	2020	2021	2022
India	Quantity	***	***	***
Malaysia	Quantity	***	***	***
Taiwan	Quantity	***	***	***
Thailand	Quantity	***	***	***
Vietnam	Quantity	***	***	***
Subject sources	Quantity	1,661,905	1,936,218	1,964,760
Subject sources less India	Quantity	***	***	***
Nonsubject sources	Quantity	***	***	***
Nonsubject sources plus India	Quantity	***	***	***
All import sources	Quantity	***	***	***
India	Value	***	***	***
Malaysia	Value	***	***	***
Taiwan	Value	***	***	***
Thailand	Value	***	***	***
Vietnam	Value	***	***	***
Subject sources	Value	97,147	112,372	153,276
Subject sources less India	Value	***	***	***
Nonsubject sources	Value	***	***	***
Nonsubject sources plus India	Value	***	***	***
All import sources	Value	***	***	***
India	Unit value	***	***	***
Malaysia	Unit value	***	***	***
Taiwan	Unit value	***	***	***
Thailand	Unit value	***	***	***
Vietnam	Unit value	***	***	***
Subject sources	Unit value	58	58	78
Subject sources less India	Unit value	***	***	***
Nonsubject sources	Unit value	***	***	***
Nonsubject sources plus India	Unit value	***	***	***
All import sources	Unit value	***	***	***

Table continued on next page.

**Table IV-2 Continued**  
**Boltless steel shelving: Share of U.S. imports by source and period**

Share and ratio in percent

Source	Measure	2020	2021	2022
India	Share of quantity	***	***	***
Malaysia	Share of quantity	***	***	***
Taiwan	Share of quantity	***	***	***
Thailand	Share of quantity	***	***	***
Vietnam	Share of quantity	***	***	***
Subject sources	Share of quantity	***	***	***
Subject sources less India	Share of quantity	***	***	***
Nonsubject sources	Share of quantity	***	***	***
Nonsubject sources plus India	Share of quantity	***	***	***
All import sources	Share of quantity	***	***	***
India	Share of value	***	***	***
Malaysia	Share of value	***	***	***
Taiwan	Share of value	***	***	***
Thailand	Share of value	***	***	***
Vietnam	Share of value	***	***	***
Subject sources	Share of value	***	***	***
Subject sources less India	Share of value	***	***	***
Nonsubject sources	Share of value	***	***	***
Nonsubject sources plus India	Share of value	***	***	***
All import sources	Share of value	***	***	***
India	Ratio	***	***	***
Malaysia	Ratio	***	***	***
Taiwan	Ratio	***	***	***
Thailand	Ratio	***	***	***
Vietnam	Ratio	***	***	***
Subject sources	Ratio	***	***	***
Subject sources less India	Ratio	***	***	***
Nonsubject sources	Ratio	***	***	***
Nonsubject sources plus India	Ratio	***	***	***
All import sources	Ratio	***	***	***

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

Note: Share of quantity is the share of U.S. imports by quantity; share of value is the share of U.S. imports by value; ratios are U.S. imports to production.

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

**Figure IV-1**

**Boltless steel shelving: U.S. import quantities and average unit values, by source and period**

\* \* \* \* \*

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

Table IV-3 presents changes in import quantity, values, and unit values between comparison periods.<sup>4</sup> As described above from 2020-22, import quantities from subject sources increased by 18.2 percent while imports from nonsubject sources increased by \*\*\* percent. Among subject sources, imports from Malaysia increased by \*\*\* percent from 2020-22, while imports from Taiwan, Thailand, and Vietnam decreased by between \*\*\* to \*\*\* percent.

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<sup>4</sup> Period changes presented in this table are based on importers' reported imports, while corresponding period changes presented in app. C are based on importers' reported U.S. shipments of imports.



**Table IV-3****Boltless steel shelving: Changes in import quantity, values, and unit values between comparison periods**

%Δ in percent

Source	Measure	2020-22	2020-21	2021-22
India	%Δ Quantity	▲ ***	***	▲ ***
Malaysia	%Δ Quantity	▲ ***	▲ ***	▲ ***
Taiwan	%Δ Quantity	▼ ***	▲ ***	▼ ***
Thailand	%Δ Quantity	▼ ***	▼ ***	▲ ***
Vietnam	%Δ Quantity	▼ ***	▼ ***	▼ ***
Subject sources	%Δ Quantity	▲ 18.2	▲ 16.5	▲ 1.5
Subject sources less India	%Δ Quantity	▲ ***	▲ ***	▼ ***
Nonsubject sources	%Δ Quantity	▲ ***	▲ ***	▲ ***
Nonsubject sources plus India	%Δ Quantity	▲ ***	▲ ***	▲ ***
All import sources	%Δ Quantity	▲ ***	▲ ***	▲ ***
India	%Δ Value	▲ ***	***	▲ ***
Malaysia	%Δ Value	▲ ***	▲ ***	▲ ***
Taiwan	%Δ Value	▲ ***	▲ ***	▲ ***
Thailand	%Δ Value	▲ ***	▼ ***	▲ ***
Vietnam	%Δ Value	▲ ***	▼ ***	▲ ***
Subject sources	%Δ Value	▲ 57.8	▲ 15.7	▲ 36.4
Subject sources less India	%Δ Value	▲ ***	▲ ***	▲ ***
Nonsubject sources	%Δ Value	▲ ***	▲ ***	▲ ***
Nonsubject sources plus India	%Δ Value	▲ ***	▲ ***	▲ ***
All import sources	%Δ Value	▲ ***	▲ ***	▲ ***
India	%Δ Unit value	▲ ***	***	▲ ***
Malaysia	%Δ Unit value	▲ ***	▼ ***	▲ ***
Taiwan	%Δ Unit value	▲ ***	▲ ***	▲ ***
Thailand	%Δ Unit value	▲ ***	▲ ***	▲ ***
Vietnam	%Δ Unit value	▲ ***	▼ ***	▲ ***
Subject sources	%Δ Unit value	▲ 33.5	▼ (0.7)	▲ 34.4
Subject sources less India	%Δ Unit value	▲ ***	▼ ***	▲ ***
Nonsubject sources	%Δ Unit value	▲ ***	▲ ***	▲ ***
Nonsubject sources plus India	%Δ Unit value	▲ ***	▲ ***	▲ ***
All import sources	%Δ Unit value	▲ ***	▼ ***	▲ ***

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 "---".

## Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.<sup>5</sup> Negligible imports are generally defined in the Act, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.<sup>6</sup>

As shown in table IV-4, imports from India accounted for \*\*\* percent of total imports of boltless steel shelving by quantity reported in questionnaire responses during April 2022 through March 2023, while imports from each other subject source reported in questionnaire responses during the same period exceeded 3 percent. Table IV-4 also presents quantity data and shares based on official Commerce statistics.

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<sup>5</sup> Sections 703(a)(1), 705(b)(1), 733(a)(1), and 735(b)(1) of the Act (19 U.S.C. §§ 1671b(a)(1), 1671d(b)(1), 1673b(a)(1), and 1673d(b)(1)).

<sup>6</sup> Section 771 (24) of the Act (19 U.S.C § 1677(24)).

**Table IV-4**

**Boltless steel shelving: U.S. imports in the twelve-month period preceding the filing of the petition, April 2022 through March 2023**

Quantity in units; share of quantity in percent

Source of imports	Quantity: Questionnaires	Share of quantity: Questionnaires	Quantity: Official statistics	Share of quantity: Official statistics
India	***	***	***	***
Malaysia	***	***	561,920	***
Taiwan	***	***	677,309	***
Thailand	***	***	676,718	***
Vietnam	***	***	416,218	***
All other sources	***	***	3,363,151	***
All import sources	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 9403.20.0075, accessed May 10, 2023. Imports are based on the imports for consumption data series. Official U.S. import statistics were adjusted to remove confirmed out-of-scope imports from India reported by U.S. importer \*\*\* under the above referenced statistical reporting number.

Table IV-5 and figure IV-2 present U.S. imports from India and all import sources by quantity in 12 month periods, starting from a period ending January 2022 through a period ending March 2023. The share of U.S. imports from India by quantity increased through the 12 month periods presented, but did not exceed \*\*\* percent in the final period presented (table IV-5). This share was \*\*\* percent from February 2021 through January 2022, and was \*\*\* percent from April 2022 through March 2023.

**Table IV-5**

**Boltless steel shelving: U.S. imports based on quantity in a series of 12-month periods leading up to and including the actual 12-month period preceding the filing of the petition, by source and the ending month of the 12-month aggregation**

Quantity in units; share of quantity in percent

Twelve month period ending	Quantity: India	Quantity: All import sources	Share: India	Share: All import sources
January 2022	***	***	***	***
February 2022	***	***	***	***
March 2022	***	***	***	***
April 2022	***	***	***	***
May 2022	***	***	***	***
June 2022	***	***	***	***
July 2022	***	***	***	***
August 2022	***	***	***	***
September 2022	***	***	***	***
October 2022	***	***	***	***
November 2022	***	***	***	***
December 2022	***	***	***	***
January 2023	***	***	***	***
February 2023	***	***	***	***
March 2023	***	***	***	***

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 9403.20.0075, accessed May 10, 2023. Imports are based on the imports for consumption data series. Official U.S. import statistics were adjusted to remove confirmed out-of-scope imports from India reported by U.S. importer \*\*\* under the above referenced statistical reporting number.

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

**Figure IV-2**

**Boltless steel shelving: India's share of overall U.S. imports based on quantity for a series of 12-month periods leading up to and including the actual 12-month period preceding the filing of the petition, by the ending month of the 12-month aggregation**

\* \* \* \* \*

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 9403.20.0075, accessed May 10, 2023. Imports are based on the imports for consumption data series. Official U.S. import statistics were adjusted to remove confirmed out-of-scope imports from India reported by U.S. importer \*\*\* under the above referenced statistical reporting number.

## **Cumulation considerations**

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

## Fungibility

Table IV-6 and figure IV-3 present U.S. shipment information for boltless steel shelving by width and source. Most of U.S. producers' U.S. shipments were of boltless steel shelving between 40 and 60 inches (\*\*\*) percent, followed by boltless steel shelving greater than 60 inches (\*\*\*) percent) and lastly by boltless steel shelving less than 40 inches (\*\*\*) percent). Most of importers' U.S. shipments from subject sources were also of boltless steel shelving between 40 and 60 inches (\*\*\*) percent), followed by boltless steel shelving less than 40 inches (\*\*\*) percent), and lastly by boltless steel shelving greater than 60 inches (\*\*\*) percent). Importers reported some level of U.S. shipments in all three width categories for boltless steel shelving from Malaysia, Thailand, and Vietnam, however \*\*\* U.S. shipments of imports from India were of boltless steel shelving greater than 60 inches, while \*\*\* U.S. shipments of imports from Taiwan were of boltless steel shelving greater than 60 inches.

Among all sources, most U.S. shipments of boltless steel shelving between 40 and 60 inches, and of shelving greater than 60 inches, were reported by U.S. producers (\*\*\*) percent and (\*\*\*) percent, respectively) while most U.S. shipments of shelving less than 40 inches were reported by importers from subject sources (\*\*\*) percent.

**Table IV-6****Boltless steel shelving: U.S. producers' and U.S. importers' U.S. shipments, by source and width, 2022**

Quantity in units

Source	Less than 40 inches	Between 40 inches and 60 inches	Greater than 60 inches	All widths
U.S. producers	***	***	***	***
India	***	***	***	***
Malaysia	***	***	***	***
Taiwan	***	***	***	***
Thailand	***	***	***	***
Vietnam	***	***	***	***
Subject sources	***	***	***	***
Subject sources less India	***	***	***	***
Nonsubject sources	***	***	***	***
Nonsubject sources plus India	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued.

**Table IV-6 Continued****Boltless steel shelving: U.S. producers' and U.S. importers' U.S. shipments, by source and width, 2022**

Share across in percent

Source	Less than 40 inches	Between 40 inches and 60 inches	Greater than 60 inches	All widths
U.S. producers	***	***	***	***
India	***	***	***	***
Malaysia	***	***	***	***
Taiwan	***	***	***	***
Thailand	***	***	***	***
Vietnam	***	***	***	***
Subject sources	***	***	***	***
Subject sources less India	***	***	***	***
Nonsubject sources	***	***	***	***
Nonsubject sources plus India	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued.

**Table IV-6 Continued**

**Boltless steel shelving: U.S. producers' and U.S. importers' U.S. shipments, by source and width, 2022**

Share down in percent

Source	Less than 40 inches	Between 40 inches and 60 inches	Greater than 60 inches	All widths
U.S. producers	***	***	***	***
India	***	***	***	***
Malaysia	***	***	***	***
Taiwan	***	***	***	***
Thailand	***	***	***	***
Vietnam	***	***	***	***
Subject sources	***	***	***	***
Subject sources less India	***	***	***	***
Nonsubject sources	***	***	***	***
Nonsubject sources plus India	***	***	***	***
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. Zeroes, null values, and undefined calculations are suppressed and shown as "---".



**Figure IV-3**  
**Boltless steel shelving: U.S. producers' and U.S. importers' U.S. shipments, by source and width, 2022**

\* \* \* \* \*

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

Table IV-7 and figure IV-4 present U.S. shipment information for boltless steel shelving by load weight and source. Most of U.S. producers' U.S. shipments were of boltless steel shelving between 1000 and 2000 pounds (\*\* percent, followed by boltless steel shelving less than 1000 pounds (\*\* percent) and lastly by boltless steel shelving greater than 2000 pounds (\*\* percent). Most of importers' U.S. shipments from subject sources were of boltless steel shelving less than 1000 pounds (\*\* percent), followed by boltless steel shelving greater than 2000 pounds (\*\* percent), and lastly by boltless steel shelving between 1000 and 2000 pounds (\*\* percent). Importers reported some level of U.S. shipments in all three load weight categories for boltless steel shelving from Malaysia, Thailand, and Vietnam, however \*\* U.S. shipments of imports from India were of boltless steel shelving between 1000 and 2000 pounds, while \*\* U.S. shipments of imports from Taiwan were of boltless steel shelving between 1000 and 2000 pounds.

Among all sources, most U.S. shipments of boltless steel shelving between 1000 and 2000 pounds, and of shelving greater 2000 pounds, were reported by U.S. producers (\*\* percent and \*\* percent, respectively) while most U.S. shipments of shelving less than 1000 pounds were reported by importers from subject sources (\*\*) percent.

**Table IV-7****Boltless steel shelving: U.S. producers' and U.S. importers' U.S. shipments, by source and load weight, 2022**

Quantity in units

Source	Less than 1000 lbs.	Between 1000 and 2000 lbs.	Greater than 2000 lbs.	All load weights
U.S. producers	***	***	***	***
India	***	***	***	***
Malaysia	***	***	***	***
Taiwan	***	***	***	***
Thailand	***	***	***	***
Vietnam	***	***	***	***
Subject sources	***	***	***	***
Subject sources less India	***	***	***	***
Nonsubject sources	***	***	***	***
Nonsubject sources plus India	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued.

**Table IV-7 Continued****Boltless steel shelving: U.S. producers' and U.S. importers' U.S. shipments, by source and load weight, 2022**

Share across in percent

Source	Less than 1000 lbs.	Between 1000 and 2000 lbs.	Greater than 2000 lbs.	All load weights
U.S. producers	***	***	***	***
India	***	***	***	***
Malaysia	***	***	***	***
Taiwan	***	***	***	***
Thailand	***	***	***	***
Vietnam	***	***	***	***
Subject sources	***	***	***	***
Subject sources less India	***	***	***	***
Nonsubject sources	***	***	***	***
Nonsubject sources plus India	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued.

**Table IV-7 Continued**

**Boltless steel shelving: U.S. producers' and U.S. importers' U.S. shipments, by source and load weight, 2022**

Share down in percent

Source	Less than 1000 lbs.	Between 1000 and 2000 lbs.	Greater than 2000 lbs.	All load weights
U.S. producers	***	***	***	***
India	***	***	***	***
Malaysia	***	***	***	***
Taiwan	***	***	***	***
Thailand	***	***	***	***
Vietnam	***	***	***	***
Subject sources	***	***	***	***
Subject sources less India	***	***	***	***
Nonsubject sources	***	***	***	***
Nonsubject sources plus India	***	***	***	***
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. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Figure IV-4**

**Boltless steel shelving: U.S. producers' and U.S. importers' U.S. shipments, by source and load weight, 2022**

\* \* \* \* \*

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

### **Geographical markets**

Table IV-8 presents U.S. imports by source and border of entry in 2022. Imports from Taiwan, Thailand, and Vietnam entered through all four borders of entry in 2022, while imports from India entered through every border but the southern border of entry, and imports from Malaysia entered only through eastern and western borders of entry.

**Table IV-8**  
**Boltless steel shelving: U.S. imports by source and border of entry, 2022**

Quantity in units

Source	East	North	South	West	All borders
India	35,053	20,698	---	12,278	68,029
Malaysia	384,001	---	---	228,168	612,169
Taiwan	346,734	132,767	165,797	111,897	757,195
Thailand	129,449	11,634	84,151	363,521	588,755
Vietnam	167,958	13,491	92,418	163,646	437,513
Subject sources	1,063,195	178,590	342,366	879,510	2,463,661
Subject sources less India	1,028,142	157,892	342,366	867,232	2,395,632
Nonsubject sources	1,050,561	437,718	385,024	1,756,221	3,629,524
Nonsubject sources plus India	1,085,614	458,416	385,024	1,768,499	3,697,553
All import sources	2,113,756	616,308	727,390	2,635,731	6,093,185

Table continued.

**Table IV-8 Continued**  
**Boltless steel shelving: U.S. imports by source and border of entry, 2022**

Share across in percent

Source	East	North	South	West	All borders
India	51.5	30.4	---	18.0	100.0
Malaysia	62.7	---	---	37.3	100.0
Taiwan	45.8	17.5	21.9	14.8	100.0
Thailand	22.0	2.0	14.3	61.7	100.0
Vietnam	38.4	3.1	21.1	37.4	100.0
Subject sources	43.2	7.2	13.9	35.7	100.0
Subject sources less India	42.9	6.6	14.3	36.2	100.0
Nonsubject sources	28.9	12.1	10.6	48.4	100.0
Nonsubject sources plus India	29.4	12.4	10.4	47.8	100.0
All import sources	34.7	10.1	11.9	43.3	100.0

Table continued.

**Table IV-8 Continued**  
**Boltless steel shelving: U.S. imports by source and border of entry, 2022**

Share down in percent

Source	East	North	South	West	All borders
India	1.7	3.4	---	0.5	1.1
Malaysia	18.2	---	---	8.7	10.0
Taiwan	16.4	21.5	22.8	4.2	12.4
Thailand	6.1	1.9	11.6	13.8	9.7
Vietnam	7.9	2.2	12.7	6.2	7.2
Subject sources	50.3	29.0	47.1	33.4	40.4
Subject sources less India	48.6	25.6	47.1	32.9	39.3
Nonsubject sources	49.7	71.0	52.9	66.6	59.6
Nonsubject sources plus India	51.4	74.4	52.9	67.1	60.7
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 9403.20.0075, accessed May 10, 2023. Imports are based on the imports for consumption data series. Official U.S. import statistics in this table were not adjusted to remove confirmed out-of-scope imports from India reported by U.S. importer \*\*\* under the above referenced statistical reporting number as \*\*\*.

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 "---".

## Presence in the market

Table IV-9 and figures IV-5 and IV-6 present U.S. imports by source and month from January 2020 to March 2023. Imports from subject sources combined were present in every month of the period. Imports from India were present in \*\*\* of 39 months, while imports from every other source were present in all months except for Malaysia in May 2020.

**Table IV-9**  
**Boltless steel shelving: U.S. imports, by year, by month, and by source**

Quantity in units

Year	Month	India	Malaysia	Taiwan	Thailand	Vietnam
2020	January	---	648	52,279	2,664	37,126
2020	February	---	432	18,398	444	43,631
2020	March	---	1,926	11,029	2,664	20,387
2020	April	4,736	1,290	52,134	10,975	19,482
2020	May	---	---	44,065	11,100	22,407
2020	June	---	432	57,295	15,096	32,239
2020	July	---	504	60,814	19,092	39,323
2020	August	---	708	80,865	22,200	52,281
2020	September	---	16,083	69,373	37,200	46,752
2020	October	---	20,961	54,767	34,908	48,967
2020	November	---	24,390	56,930	52,434	36,741
2020	December	---	79,041	55,082	62,364	27,465
2021	January	---	32,129	64,790	50,442	90,466
2021	February	---	41,206	38,112	22,758	44,722
2021	March	---	47,295	54,528	51,219	48,974
2021	April	---	58,617	70,087	54,557	21,871
2021	May	---	61,870	74,676	51,076	21,487
2021	June	---	52,425	59,197	31,636	51,487
2021	July	1,420	25,983	66,379	37,428	41,686
2021	August	---	6,516	59,774	25,848	53,599
2021	September	---	20,511	48,454	13,330	20,415
2021	October	---	22,401	80,118	7,813	31,020
2021	November	---	49,086	74,978	50,369	37,993
2021	December	78	46,472	92,751	11,080	28,840

Table continued.

**Table IV-9 Continued****Boltless steel shelving: U.S. imports, by year, by month, and by source**

Quantity in units

Year	Month	India	Malaysia	Taiwan	Thailand	Vietnam
2022	January	---	16,587	57,898	19,048	32,810
2022	February	---	25,479	58,776	19,558	21,078
2022	March	---	28,188	64,507	36,212	27,376
2022	April	***	88,992	73,097	23,151	42,358
2022	May	***	95,517	62,333	31,572	54,106
2022	June	***	67,473	58,295	91,215	29,791
2022	July	***	46,323	61,108	59,106	39,433
2022	August	***	68,040	71,208	51,101	37,823
2022	September	***	57,015	82,595	55,568	74,289
2022	October	***	63,288	40,709	103,064	27,646
2022	November	***	32,643	72,564	47,163	29,677
2022	December	***	22,624	54,105	51,997	21,126
2023	January	***	5,029	45,735	52,066	29,003
2023	February	***	6,496	27,812	52,906	16,739
2023	March	***	8,480	27,748	57,809	14,227

Table continued.



**Table IV-9 Continued**  
**Boltless steel shelving: U.S. imports, by year, by month, and by source**

Quantity in units

Year	Month	Subject sources	Subject sources less India	Nonsubject sources	Nonsubject sources plus India	All import sources
2020	January	92,717	92,717	138,055	138,055	230,772
2020	February	62,905	62,905	134,321	134,321	197,226
2020	March	36,006	36,006	252,395	252,395	288,401
2020	April	88,617	83,881	112,896	117,632	201,513
2020	May	77,572	77,572	107,300	107,300	184,872
2020	June	105,062	105,062	470,247	470,247	575,309
2020	July	119,733	119,733	147,962	147,962	267,695
2020	August	156,054	156,054	156,132	156,132	312,186
2020	September	169,408	169,408	150,641	150,641	320,049
2020	October	159,603	159,603	154,949	154,949	314,552
2020	November	170,495	170,495	96,489	96,489	266,984
2020	December	223,952	223,952	232,259	232,259	456,211
2021	January	237,827	237,827	344,584	344,584	582,411
2021	February	146,798	146,798	129,109	129,109	275,907
2021	March	202,016	202,016	404,340	404,340	606,356
2021	April	205,132	205,132	140,265	140,265	345,397
2021	May	209,109	209,109	191,523	191,523	400,632
2021	June	194,745	194,745	281,151	281,151	475,896
2021	July	172,896	171,476	182,711	184,131	355,607
2021	August	145,737	145,737	216,173	216,173	361,910
2021	September	102,710	102,710	185,555	185,555	288,265
2021	October	141,352	141,352	217,820	217,820	359,172
2021	November	212,426	212,426	140,293	140,293	352,719
2021	December	179,221	179,143	204,340	204,418	383,561

Table continued.

**Table IV-9 Continued**  
**Boltless steel shelving: U.S. imports, by year, by month, and by source**

Quantity in units

Year	Month	Subject sources	Subject sources less India	Nonsubject sources	Nonsubject sources plus India	All import sources
2022	January	126,343	126,343	252,413	252,413	378,756
2022	February	124,891	124,891	340,172	340,172	465,063
2022	March	156,283	156,283	187,195	187,195	343,478
2022	April	***	***	183,804	***	***
2022	May	***	***	423,035	***	***
2022	June	***	***	392,689	***	***
2022	July	***	***	261,849	***	***
2022	August	***	***	175,285	***	***
2022	September	***	***	357,453	***	***
2022	October	***	***	598,314	***	***
2022	November	***	***	175,000	***	***
2022	December	***	***	282,315	***	***
2023	January	***	***	261,736	***	***
2023	February	***	***	128,945	***	***
2023	March	***	***	122,726	***	***

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 9403.20.0075, accessed May 10, 2023. Imports are based on the imports for consumption data series. Official U.S. import statistics were adjusted to remove confirmed out-of-scope imports from India reported by U.S. importer \*\*\* under the above referenced statistical reporting number. \*\*\*.

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

**Figure IV-5**

**Boltless steel shelving: U.S. imports from individual subject sources, by source and by month**

\* \* \* \* \*

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 9403.20.0075, accessed May 10, 2023. Imports are based on the imports for consumption data series. Official U.S. import statistics were adjusted to remove confirmed out-of-scope imports from India reported by U.S. importer \*\*\* under the above referenced statistical reporting number.

**Figure IV-6**

**Boltless steel shelving: U.S. imports from aggregated subject and nonsubject sources, by month**

\* \* \* \* \*

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 9403.20.0075, accessed May 10, 2023. Imports are based on the imports for consumption data series. Official U.S. import statistics were adjusted to remove confirmed out-of-scope imports from India reported by U.S. importer \*\*\* under the above referenced statistical reporting number.

## **Apparent U.S. consumption and market shares**

### **Quantity**

Table IV-10 and figure IV-7 present data on apparent U.S. consumption and U.S. market shares by quantity for boltless steel shelving. The share of apparent U.S. consumption accounted for by U.S. producers decreased by \*\*\* percentage points from 2020-22, while the share held by subject sources increased \*\*\* percentage points from 2020-22. Imports from Malaysia had the largest increase in share among subject sources from 2020-22 (\*\*\* percentage points). The share held by nonsubject sources increased \*\*\* percentage points from 2020-22.

**Table IV-10**

**Boltless steel shelving: Apparent U.S. consumption and market shares based on quantity, by source and period**

Quantity in units; shares in percent

Source	Measure	2020	2021	2022
U.S. producers	Quantity	***	***	***
India	Quantity	***	***	***
Malaysia	Quantity	***	***	***
Taiwan	Quantity	***	***	***
Thailand	Quantity	***	***	***
Vietnam	Quantity	***	***	***
Subject sources	Quantity	1,628,878	1,996,209	1,958,196
Subject sources less India	Quantity	***	***	***
Nonsubject sources	Quantity	***	***	***
Nonsubject sources plus India	Quantity	***	***	***
All import sources	Quantity	***	***	***
All sources	Quantity	***	***	***
U.S. producers	Share	***	***	***
India	Share	***	***	***
Malaysia	Share	***	***	***
Taiwan	Share	***	***	***
Thailand	Share	***	***	***
Vietnam	Share	***	***	***
Subject sources	Share	***	***	***
Subject sources less India	Share	***	***	***
Nonsubject sources	Share	***	***	***
Nonsubject sources plus India	Share	***	***	***
All import sources	Share	***	***	***
All sources	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. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Figure IV-7**

**Boltless steel shelving: Apparent U.S. consumption based on quantity, by source and period**

\* \* \* \* \*

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

## Value

Table IV-11 and figure IV-8 present data on apparent U.S. consumption and U.S. market shares by value for boltless steel shelving. The share of apparent U.S. consumption by value accounted for by U.S. producers decreased by \*\*\* percentage points from 2020-22, while the share held by subject sources increased \*\*\* percentage points from 2020-22. The share held by nonsubject sources increased \*\*\* percentage points from 2020-22.

**Table IV-11**  
**Boltless steel shelving: Apparent U.S. consumption and market shares based on value, by source and period**

Value in 1,000 dollars; shares in percent

Source	Measure	2020	2021	2022
U.S. producers	Value	***	***	***
India	Value	***	***	***
Malaysia	Value	***	***	***
Taiwan	Value	***	***	***
Thailand	Value	***	***	***
Vietnam	Value	***	***	***
Subject sources	Value	131,342	159,106	182,719
Subject sources less India	Value	***	***	***
Nonsubject sources	Value	***	***	***
Nonsubject sources plus India	Value	***	***	***
All import sources	Value	***	***	***
All sources	Value	***	***	***
U.S. producers	Share	***	***	***
India	Share	***	***	***
Malaysia	Share	***	***	***
Taiwan	Share	***	***	***
Thailand	Share	***	***	***
Vietnam	Share	***	***	***
Subject sources	Share	***	***	***
Subject sources less India	Share	***	***	***
Nonsubject sources	Share	***	***	***
Nonsubject sources plus India	Share	***	***	***
All import sources	Share	***	***	***
All sources	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. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

**Figure IV-8**

**Boltless steel shelving: Apparent U.S. consumption based on value, by source and period**

\* \* \* \* \*

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



# Part V: Pricing data

## Factors affecting prices

### Raw material costs

Boltless steel shelving is primarily made from hot-rolled steel along with finishing components for decking, such as wire racks and particle board. For domestic producers of boltless steel shelving, raw materials as a share of the cost of goods sold accounted for between \*\*\* and \*\*\* percent between 2020 and 2022.

U.S. producer Edsal sources its hot-rolled steel in coil almost exclusively from U.S. vendors or producers of steel in the Midwest on the spot market between 3 and 6 months in advance.<sup>1</sup> Prices for hot-rolled coil increased from January 2020 through September 2021, when they reached a period high. Prices began to decrease after September 2021, although they increased temporarily from February 2022 to April 2022. Prices continued their downward trend through November 2022 before increasing again. Overall, prices of hot-rolled coil increased by \*\*\* percent from January 2020 to December 2022. From December 2022 to April 2023, prices increased by \*\*\* percent.

**Figure V-1**  
**Raw materials: Steel hot-rolled coil, fob mill U.S. Midwest, Monthly average prices, January 2020-April 2023**

\* \* \* \* \*

Source: \*\*\*, retrieved May 16, 2023.

<sup>1</sup> Conference transcript, pp. 76-77 (White).

**Table V-1****Raw materials: Steel hot-rolled coil, fob mill U.S. Midwest, Monthly average prices, January 2020-April 2023**

Month and Year	Dollars per metric ton	Dollars per short ton
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	***	***
Aug-22	***	***
Sep-22	***	***
Oct-22	***	***
Nov-22	***	***
Dec-22	***	***
Jan-23	***	***
Feb-23	***	***
Mar-23	***	***
Apr-23	***	***

Source: \*\*\*, retrieved May 16, 2023.

## Transportation costs to the U.S. market

Transportation costs for boltless steel shelving shipped from subject countries to the United States averaged 12.2 percent for India, 8.4 for Malaysia, 13.0 for Taiwan, 8.2 for Thailand, and 12.2 for Vietnam during 2022.<sup>2</sup> These estimates were derived from official import data and represent the transportation and other charges on imports.<sup>3</sup>

## U.S. inland transportation costs

\*\*\* and three importers reported that they typically arrange transportation to their customers. U.S. producers reported that their U.S. inland transportation costs ranged from \*\*\* percent while importers reported costs of 1 to 10 percent.

## Pricing practices

### Pricing methods

U.S. producers and importers reported setting prices by transaction-by transaction negotiations, contracts, and set price lists (table V-2).

**Table V-2**

**Boltless steel shelving: Count of U.S. producers' and importers' reported price setting methods**

Method	U.S. producers	Importers
Transaction-by-transaction	***	2
Contract	***	1
Set price list	***	1
Other	***	0
Responding firms	2	4

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.

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<sup>2</sup> This calculation does not adjust to remove out-of-scope merchandise.

<sup>3</sup> The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2022 and then dividing by the customs value based on the HTS statistical reporting number 9403.20.0075.

U.S. producers reported selling \*\*\* of their boltless steel shelving in the \*\*\*, and importers reported selling most of their boltless steel shelving under long-term contracts (table V-2). Edsal reported that the retailers or purchasers of boltless steel shelving will send out invitations to manufacturers of boltless steel shelving for certain products that they would like to receive quotes on for a certain period of time, and provide a range of volume that they are thinking of buying.<sup>4</sup> According to Edsal, \*\*\*.<sup>5</sup> Two importers reported that its typical sales contract provisions include price renegotiation, one reported fixed price, one reported fixed to both price and quantity, and one reported indexing to raw materials but did not reference a specific index.

**Table V-3**  
**Boltless steel shelving: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2022**

Share in percent

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

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

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

## Sales terms and discounts

\*\*\* importers typically quote prices on an f.o.b. basis; \*\*\* reported that its f.o.b. points of shipment were Chicago, Illinois, Gary, Indiana, and Bloomington, California, while \*\*\* reported that its f.o.b. points of shipment were San Diego, California and Savannah, Georgia. U.S. producer Tennsco reported \*\*\*, Edsal reported \*\*\*, and both U.S. producers reported \*\*\*. U.S. importers reported offering promotional (3 firms) and total volume discounts (2 firms).

<sup>4</sup> Conference transcript, pp. 61-62 (Kruger).

<sup>5</sup> Petitioner's postconference brief, pp. 10-11.

## Price and purchase cost data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following boltless steel shelving products shipped to unrelated U.S. customers during January 2020-March 2023. Firms that imported these products from India, Malaysia, Taiwan, or Thailand for retail sale were requested to provide import purchase cost data.

**Product 1.**-- 77" Width x 24" Depth x 72" to 78" Height, 4 -level rack, boltless/welded steel shelving with steel wire decking with load capacity of 1,000 pounds to 3,000 pounds per level

**Product 2.**-- 48" Width x 18" to 24" Depth x 72" to 86" Height, 5-level or 6-level, boltless/rivet steel shelving with particle board or laminate deck, with load capacity of 250 pounds to 1,000 pounds per level

**Product 3.**-- 48" Width x 24" Depth x 72" to 78" Height, 5-level boltless/rivet steel shelving with steel wire deck, with load capacity of 250 pounds to 1,000 pounds per level

**Product 4.**-- 36" Width x 18" Depth x 72" to 78" Height, 5-level boltless/rivet steel shelving with particle board or laminate deck, with load capacity of 250 pounds to 1,000 pounds per level

## Price data

\*\*\* five importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.<sup>6</sup> Pricing data reported by these firms accounted for approximately \*\*\* percent of overall U.S. producers' shipments of boltless steel shelving, \*\*\* percent of U.S. shipments of subject imports from Malaysia in 2022, \*\*\* percent of U.S. shipments of subject imports from Thailand, and \*\*\* percent of U.S. shipments of subject imports from Vietnam.<sup>7</sup> Purchase cost data reported by these firms accounted for \*\*\* of U.S. imports from India, approximately \*\*\* of imports percent from Malaysia, \*\*\* percent from Taiwan, \*\*\* percent from Thailand, and \*\*\* percent from Vietnam.

Price data for products 1-4 are presented in tables V-4 to V-7 and figures V-2 to V-5.

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<sup>6</sup> 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. Importer/purchaser \*\*\* initially refused to submit a questionnaire response due to "time constraints" and did not submit questionnaire responses until May 29, then has provided piecemeal and insufficient revisions resulting from multiple attempts from staff to provide accurate data for the purposes of these investigations.

<sup>7</sup> Estimates for shipments of subject imports from Vietnam are driven by \*\*\*.

**Table V-4**

**Boltless steel shelving: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter**

Price in dollars per unit, quantity in units, margin in percent.

Period	US price	US quantity	Malaysia price	Malaysia quantity	Malaysia margin	Thailand price	Thailand quantity	Thailand margin
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***

Table continued.

**Table V-4 Continued**

**Boltless steel shelving: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter**

Period	Vietnam price	Vietnam quantity	Vietnam margin	Subject sources price	Subject sources quantity	Subject sources margin
2020 Q1	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***

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

Note: \*\*\*.

Note: Product 1: 77" Width x 24" Depth x 72" to 78" Height, 4 -level rack, boltless/welded steel shelving with steel wire decking with load capacity of 1,000 pounds to 3,000 pounds per level.

**Table V-5**

**Boltless steel shelving: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter**

Price in dollars per unit, quantity in units, margin in percent.

Period	US price	US quantity	Malaysia price	Malaysia quantity	Malaysia margin	Thailand price	Thailand quantity	Thailand margin
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***

Table continued.

**Table V-5 Continued**

**Boltless steel shelving: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter**

Period	Vietnam price	Vietnam quantity	Vietnam margin	Subject sources price	Subject sources quantity	Subject sources margin
2020 Q1	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***

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

Note: \*\*\*.

Note: Product 2: 48" Width x 18" to 24" Depth x 72" to 86" Height, 5-level or 6-level, boltless/rivet steel shelving with particle board or laminate deck, with load capacity of 250 pounds to 1,000 pounds per level.



**Table V-6**

**Boltless steel shelving: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter**

Price in dollars per unit, quantity in units, margin in percent.

Period	US price	US quantity	Malaysia price	Malaysia quantity	Malaysia margin	Vietnam price	Vietnam quantity	Vietnam margin
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***

Table continued.

**Table V-6 Continued**

**Boltless steel shelving: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter**

Period	Subject sources price	Subject sources quantity	Subject sources margin
2020 Q1	***	***	***
2020 Q2	***	***	***
2020 Q3	***	***	***
2020 Q4	***	***	***
2021 Q1	***	***	***
2021 Q2	***	***	***
2021 Q3	***	***	***
2021 Q4	***	***	***
2022 Q1	***	***	***
2022 Q2	***	***	***
2022 Q3	***	***	***
2022 Q4	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires. 4

Note: \*\*\*.

Note: Product 3: 48" Width x 24" Depth x 72" to 78" Height, 5-level boltless/rivet steel shelving with steel wire deck, with load capacity of 250 pounds to 1,000 pounds per level.

**Table V-7**

**Boltless steel shelving: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source and quarter**

Price in dollars per unit, quantity in units, margin in percent.

Period	US price	US quantity	Malaysia price	Malaysia quantity	Malaysia margin	Subject sources price	Subject sources quantity	Subject sources margin
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***

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

Note: \*\*\*

Note: Product 4: 36" Width x 18" Depth x 72" to 78" Height, 5-level boltless/rivet steel shelving with particle board or laminate deck, with load capacity of 250 pounds to 1,000 pounds per level.

**Figure V-2**

**Boltless steel shelving: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by source and quarter**

**Price of product 1**

\* \* \* \* \*

**Volume of product 1**

\* \* \* \* \*

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

Note: \*\*\*.

**Note: Product 1: Product 1: 77" Width x 24" Depth x 72" to 78" Height, 4 -level rack, boltless/welded steel shelving with steel wire decking with load capacity of 1,000 pounds to 3,000 pounds per level.**

**Figure V-3**

**Boltless steel shelving: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by source and quarter**

**Price of product 2**

\* \* \* \* \*

**Volume of product 2**

\* \* \* \* \*

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

Note: \*\*\*.

**Note: Product 2: 48" Width x 18" to 24" Depth x 72" to 86" Height, 5-level or 6-level, boltless/rivet steel shelving with particle board or laminate deck, with load capacity of 250 pounds to 1,000 pounds per level.**

**Figure V-4**

**Boltless steel shelving: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by source and quarter**

**Price of product 3**

\* \* \* \* \*

**Volume of product 3**

\* \* \* \* \*

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

Note: \*\*\*.

**Note: Product 3: 48" Width x 24" Depth x 72" to 78" Height, 5-level boltless/rivet steel shelving with steel wire deck, with load capacity of 250 pounds to 1,000 pounds per level.**

**Figure V-4**

**Boltless steel shelving: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, by source and quarter**

**Price of product 4**

\* \* \* \* \*

**Volume of product 4**

\* \* \* \* \*

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

Note: \*\*\*.

Note: Product 4: 36" Width x 18" Depth x 72" to 78" Height, 5-level boltless/rivet steel shelving with particle board or laminate deck, with load capacity of 250 pounds to 1,000 pounds per level.

## Import purchase cost data

Five importers reported useable import purchase cost data for products 1-4.<sup>8</sup> Purchase cost data reported by these firms accounted for \*\*\* imports from India, \*\*\* percent of imports from Malaysia, \*\*\* percent of imports from Taiwan, and \*\*\* percent of imports from Thailand, and \*\*\* percent from Vietnam in 2022.<sup>9</sup> The largest importers reporting purchase cost data include \*\*\* which accounted for \*\*\* percent and \*\*\* percent, respectively, of purchase cost data from all subject countries in 2022. Importer \*\*\* reported purchase cost data from India, Malaysia, and Taiwan, while \*\*\* reported purchase cost data from Thailand and Vietnam. Landed duty-paid purchase cost data for imports from India, Malaysia, Taiwan, Thailand, and Vietnam are presented in tables V-8 to V-11, along with U.S. producers' sales prices.<sup>10</sup>

Importers reporting import purchase cost data were asked to provide additional information regarding the costs and benefits of importing boltless steel shelving themselves.

Three of five importers<sup>11</sup> reported that they incurred additional costs beyond landed duty-paid costs by importing boltless steel shelving themselves rather than purchasing from a U.S. producer or U.S. importer. All three importers estimated the total additional cost incurred; importers reported estimates of 3, 8, and 20 percent compared to the landed duty-paid value. Firms were also asked to identify specific additional costs they incurred as a result of importing boltless steel shelving. Reported costs and their estimated share of LDP include handling and warehousing costs (1 and 6 percent), transportation costs including container costs (25 percent),<sup>12</sup> occupancy cost (2 percent), and other costs including "insurance, supply chain, management" costs (2 percent).

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<sup>8</sup> \*\*\* units of purchase cost data from \*\*\* and \*\*\* units of purchase cost data from \*\*\* reported by importer \*\*\* were removed, as it reported purchase cost data but did not report internal consumption.

<sup>9</sup> One importer reported purchase cost data from India for 2022 only.

<sup>10</sup> LDP import value does not include any potential additional costs that a purchaser may incur by importing rather than purchasing from another importer or U.S. producer. Price-cost differences are based on LDP import values whereas margins of underselling/overselling are based on importer sales prices.

<sup>11</sup> Importers \*\*\* responded to the question regarding additional costs but did not report purchase cost data from subject sources. Their responses are not included in the import purchase cost data discussion.

<sup>12</sup> Petitioner Edsal argues that \*\*\*. Petitioner Edsal's postconference brief, p. 29.

Firms were also asked to describe how these additional costs incurred by importing boltless steel shelving themselves compares with additional costs incurred when purchasing from a U.S. producer or U.S. importer. Firms' responses varied. Importer \*\*\* reported that its additional costs associated with importing are seven-times higher than purchasing the product from a U.S. producer or importer. Importer \*\*\* reported that it can leverage its \*\*\*.

Four importers, \*\*\* reported that they compare costs of importing to the cost of purchasing from a U.S. producer and a U.S. importer in determining whether to import boltless steel shelving.

Four importers identified benefits from importing boltless steel shelving directly instead of purchasing from U.S. producers or importers, including: price (\*\*\*), inventory concerns and quality (\*\*\*).

Firms were also asked whether the import cost (both excluding and including additional costs) of boltless steel shelving they imported are lower than the price of purchasing boltless steel shelving from a U.S. producer or importer. Two importers (\*\*) reported that import costs are lower than the purchasing product from domestic and import sources when not including the additional costs, and \*\*\* reported that inclusive of the additional costs, it is cheaper to import boltless steel shelving than to purchase from domestic and import sources.

Four importers estimated that they saved between \*\*\* percent of the purchase price by importing boltless steel shelving rather than purchasing from a U.S. producer, and two reported saving \*\*\* percent compared to purchasing the product from a U.S. importer.<sup>13</sup>

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<sup>13</sup> Three firms reported that they based their estimates on previous company transactions, one reported basing their estimates on market research, and one reported other bases for their estimates, including quoted domestic prices.



**Table V-8**

**Boltless Steel shelving: Import landed duty-paid purchase costs and domestic prices, quantities of product 1, and price-cost differentials, by quarter**

Price and LDP value in dollars per unit, quantity in units, margin and price-cost differential in percent.

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

Table continued.

**Table V-8 Continued**

**Boltless Steel shelving: Import landed duty-paid purchase costs and domestic prices, quantities of product 1, and price-cost differentials, by quarter**

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

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

Note: \*\*\*.

Note: Product 1: 77" Width x 24" Depth x 72" to 78" Height, 4 -level rack, boltless/welded steel shelving with steel wire decking with load capacity of 1,000 pounds to 3,000 pounds per level.

Note: U.S. producer price data is the same as that presented in table V-4.

**Table V-9**

**Boltless Steel shelving: Import landed duty-paid purchase costs and domestic prices, quantities of product 2, and price-cost differentials, by quarter**

Price and LDP value in dollars per unit, quantity in units, margin and price-cost differential in percent.

Period	US price	US quantity	Malaysia LDP unit cost	Malaysia quantity	Malaysia Price-cost differential	Taiwan unit LDP value	Taiwan quantity	Taiwan differential
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***

Table continued.

**Table V-9 Continued**

**Boltless Steel shelving: Import landed duty-paid purchase costs and domestic prices, quantities of product 2, and price-cost differentials, by quarter**

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

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

Note: \*\*\*.

Note: Product 2: 48" Width x 18" to 24" Depth x 72" to 86" Height, 5-level or 6-level, boltless/rivet steel shelving with particle board or laminate deck, with load capacity of 250 pounds to 1,000 pounds per level.

Note: U.S. producer price data is the same as that presented in table V-5.

**Table V-10**

**Boltless Steel shelving: Import landed duty-paid purchase costs and domestic prices, quantities of product 3, and price-cost differentials, by quarter**

Price and LDP value in dollars per unit, quantity in units, margin and price-cost differential in percent.

Period	US price	US quantity	Thailand LDP unit cost	Thailand quantity	Thailand Price-cost differential	Vietnam LDP unit cost	Vietnam quantity	Vietnam Price-cost differential
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***

Table continued.

**Table V-10 Continued**

**Boltless Steel shelving: Import landed duty-paid purchase costs and domestic prices, quantities of product 3, and price-cost differentials, by quarter**

Period	Subject sources unit LDP value	Subject sources quantity	Subject sources differential
2020 Q1	***	***	***
2020 Q2	***	***	***
2020 Q3	***	***	***
2020 Q4	***	***	***
2021 Q1	***	***	***
2021 Q2	***	***	***
2021 Q3	***	***	***
2021 Q4	***	***	***
2022 Q1	***	***	***
2022 Q2	***	***	***
2022 Q3	***	***	***
2022 Q4	***	***	***

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

Note: \*\*\*.

Note: Product 3: 48" Width x 24" Depth x 72" to 78" Height, 5-level boltless/rivet steel shelving with steel wire deck, with load capacity of 250 pounds to 1,000 pounds per level.

**Note: U.S. producer price data is the same as that presented in table V-6.**

**Table V-11**

**Boltless Steel shelving: Import landed duty-paid purchase costs and domestic prices, quantities of product 4, and price-cost differentials, by quarter**

Price and LDP value in dollars per unit, quantity in units, margin and price-cost differential in percent.

Period	US price	US quantity	Malaysia LDP unit cost	Malaysia quantity	Malaysia Price-cost differential	Taiwan LDP unit cost	Taiwan quantity	Taiwan Price-cost differential
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***

Table continued.

**Table V-11 Continued**

**Boltless Steel shelving: Import landed duty-paid purchase costs and domestic prices, quantities of product 4, and price-cost differentials, by quarter**

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

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

Note: \*\*\*.

Note: Product 4: 36" Width x 18" Depth x 72" to 78" Height, 5-level boltless/rivet steel shelving with particle board or laminate deck, with load capacity of 250 pounds to 1,000 pounds per level.

Note: U.S. producer price data is the same as that presented in table V-7.

**Figure V-5**

**Boltless steel shelving: U.S. producer prices and import purchase costs, and quantities, of product 1, by quarter**

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

\* \* \* \* \*

**Volume of product 1**

\* \* \* \* \*

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

Note: \*\*\*.

**Note: Product 1: 77" Width x 24" Depth x 72" to 78" Height, 4 -level rack, boltless/welded steel shelving with steel wire decking with load capacity of 1,000 pounds to 3,000 pounds per level.**

**Figure V-6**

**Boltless steel shelving: U.S. producer prices and import purchase costs, and quantities, of product 2, by quarter**

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

\* \* \* \* \*

**Volume of product 2**

\* \* \* \* \*

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

Note: \*\*\*.

Note: Product 2: 48" Width x 18" to 24" Depth x 72" to 86" Height, 5-level or 6-level, boltless/rivet steel shelving with particle board or laminate deck, with load capacity of 250 pounds to 1,000 pounds per level.

**Figure V-7**

**Boltless steel shelving: U.S. producer prices and import purchase costs, and quantities, of product 3, by quarter**

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

\* \* \* \* \*

**Volume of product 3**

\* \* \* \* \*

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

Note: \*\*\*.

**Note: Product 3: 48" Width x 24" Depth x 72" to 78" Height, 5-level boltless/rivet steel shelving with steel wire deck, with load capacity of 250 pounds to 1,000 pounds per level.**



**Figure V-8**

**Boltless steel shelving: U.S. producer prices and import purchase costs, and quantities, of product 4, by quarter**

**U.S. price and import purchase cost of product 4**

\* \* \* \* \*

**Volume of product 4**

\* \* \* \* \*

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

Note: \*\*\*.

Note: Product 4: 36" Width x 18" Depth x 72" to 78" Height, 5-level boltless/rivet steel shelving with particle board or laminate deck, with load capacity of 250 pounds to 1,000 pounds per level.

## **Price and purchase cost trends**

In general, prices increased during January 2020–December 2022. Table V-12 summarizes the price trends, by country and by product. As shown in the table, domestic price increases ranged from \*\*\* percent, while landed duty-paid cost increases ranged from \*\*\* percent during January 2020–December 2022.

**Table V-12****Boltless steel shelving: Summary of price and cost data, by product and source**

Volume in units, price and cost in dollars per unit

Product	Source	Number of quarters	Volume of shipments	Low price/cost	High price/cost	First quarter price/cost	Last quarter price/cost	Percent change in price/cost over period
Product 1	United States	***	***	***	***	***	***	***
Product 1	India price	***	***	***	***	***	***	***
Product 1	Malaysia price	***	***	***	***	***	***	***
Product 1	Taiwan price	***	***	***	***	***	***	***
Product 1	Thailand price	***	***	***	***	***	***	***
Product 1	Vietnam price	***	***	***	***	***	***	***
Product 2	United States	***	***	***	***	***	***	***
Product 2	India price	***	***	***	***	***	***	***
Product 2	Malaysia price	***	***	***	***	***	***	***
Product 2	Taiwan price	***	***	***	***	***	***	***
Product 2	Thailand price	***	***	***	***	***	***	***
Product 2	Vietnam price	***	***	***	***	***	***	***
Product 3	United States	***	***	***	***	***	***	***
Product 3	India price	***	***	***	***	***	***	***
Product 3	Malaysia price	***	***	***	***	***	***	***
Product 3	Taiwan price	***	***	***	***	***	***	***
Product 3	Thailand price	***	***	***	***	***	***	***
Product 3	Vietnam price	***	***	***	***	***	***	***
Product 4	United States	***	***	***	***	***	***	***
Product 4	India price	***	***	***	***	***	***	***
Product 4	Malaysia price	***	***	***	***	***	***	***
Product 4	Taiwan price	***	***	***	***	***	***	***
Product 4	Thailand price	***	***	***	***	***	***	***
Product 4	Vietnam price	***	***	***	***	***	***	***

Table continued.

**Table V-12 Continued****Boltless steel shelving: Summary of price and cost data, by product and source**

Volume in units, price and cost in dollars per unit

Product	Source	Number of quarters	Volume of shipments	Low price/cost	High price/cost	First quarter price/cost	Last quarter price/cost	Percent change in price/cost over period
Product 1	United States	***	***	***	***	***	***	***
Product 1	India cost	***	***	***	***	***	***	***
Product 1	Malaysia cost	***	***	***	***	***	***	***
Product 1	Taiwan cost	***	***	***	***	***	***	***
Product 1	Thailand cost	***	***	***	***	***	***	***
Product 1	Vietnam cost	***	***	***	***	***	***	***
Product 2	United States	***	***	***	***	***	***	***
Product 2	India cost	***	***	***	***	***	***	***
Product 2	Malaysia cost	***	***	***	***	***	***	***
Product 2	Taiwan cost	***	***	***	***	***	***	***
Product 2	Thailand cost	***	***	***	***	***	***	***
Product 2	Vietnam cost	***	***	***	***	***	***	***
Product 3	United States	***	***	***	***	***	***	***
Product 3	India cost	***	***	***	***	***	***	***
Product 3	Malaysia cost	***	***	***	***	***	***	***
Product 3	Taiwan cost	***	***	***	***	***	***	***
Product 3	Thailand cost	***	***	***	***	***	***	***
Product 3	Vietnam cost	***	***	***	***	***	***	***
Product 4	United States	***	***	***	***	***	***	***
Product 4	India cost	***	***	***	***	***	***	***
Product 4	Malaysia cost	***	***	***	***	***	***	***
Product 4	Taiwan cost	***	***	***	***	***	***	***
Product 4	Thailand cost	***	***	***	***	***	***	***
Product 4	Vietnam cost	***	***	***	***	***	***	***

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

Note: Percentage change from the first quarter in which data were available in 2020 to the last quarter in which data were available in 2023.

## Price and purchase cost comparisons

### Price comparisons

As shown in tables V-13 and V-14, prices for imported product were below those for U.S.-produced product in 54 of 63 instances (\*\*\*) units); margins of underselling ranged from \*\*\* percent. Prices for product imported from Thailand were below those for U.S.-produced product in 11 of 19 instances (\*\*\*) units); margins of underselling ranged from \*\*\* percent. In the remaining 8 instances (\*\*\*) units), prices for product from Thailand were between \*\*\* percent above prices for the domestic product. Prices for product imported from Vietnam were below those for U.S.-produced product in all 15 instances (\*\*\*) units); margins of underselling ranged from \*\*\* percent.

**Table V-13**

**Boltless steel shelving: Instances of underselling and overselling and the range and average of margins, by product**

Quantity in units; margin in percent

Products	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	23	***	***	***	***
Product 2	Underselling	15	***	***	***	***
Product 3	Underselling	10	***	***	***	***
Product 4	Underselling	6	***	***	***	***
<b>All products</b>	<b>Underselling</b>	<b>54</b>	<b>***</b>	<b>***</b>	<b>***</b>	<b>***</b>
Product 1	Overselling	6	***	***	***	***
Product 2	Overselling	3	***	***	***	***
Product 3	Overselling	---	***	***	***	***
Product 4	Overselling	---	***	***	***	***
<b>All products</b>	<b>Overselling</b>	<b>9</b>	<b>***</b>	<b>***</b>	<b>***</b>	<b>***</b>

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-14**

**Boltless steel shelving: Instances of underselling and overselling and the range and average of margins, by source**

Quantity in units; margin in percent

Sources	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
India	Underselling	---	***	***	***	***
Malaysia	Underselling	26	***	***	***	***
Taiwan	Underselling	---	***	***	***	***
Thailand	Underselling	11	***	***	***	***
Vietnam	Underselling	15	***	***	***	***
<b>Subject sources</b>	<b>Underselling</b>	52	***	***	***	***
<b>Subject sources less India</b>	<b>Overselling</b>	52	***	***	***	***
India	Overselling	---	***	***	***	***
Malaysia	Overselling	1	***	***	***	***
Taiwan	Overselling	---	***	***	***	***
Thailand	Overselling	8	***	***	***	***
Vietnam	Overselling	---	***	***	***	***
<b>Subject sources</b>	<b>Overselling</b>	9	***	***	***	***
<b>Subject sources less India</b>	<b>Overselling</b>	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.

## Price-cost comparisons

As shown in tables V-15 and V-16, landed-duty paid costs for boltless steel shelving imported from subject countries were lower than the sales price for U.S.-produced product in 70 of 111 instances; price-cost differentials ranged from \*\*\* percent. Landed duty-paid costs for boltless steel shelving imported from India were higher than the sales price for U.S.-produced product in 2 instances; price-cost differentials ranged from \*\*\* percent. Landed duty-paid costs for boltless steel shelving imported from Malaysia were below the sales price for U.S.-produced product in 13 of 25 instances (\*\*\* units); price-cost differentials ranged from \*\*\* percent. In the remaining 12 instances (\*\*\* units), landed duty-paid costs for boltless steel shelving from Malaysia were between \*\*\* percent above sales prices for the domestic product. Landed duty-paid costs for boltless steel shelving imported from Taiwan were below the sales price for U.S.-produced product in 7 of 13 instances (\*\*\* units); price-cost differentials ranged from \*\*\* percent. In the remaining 6 instances (\*\*\* units), landed duty-paid costs for boltless steel shelving from Taiwan were between \*\*\* percent above sales prices for the domestic product. Landed duty-paid costs for boltless steel shelving imported from Thailand were below the sales price for U.S.-produced product in 21 of 26 instances (\*\*\* units); price-cost differentials ranged from \*\*\* percent. In the remaining 5 instances (\*\*\* units), landed duty-paid costs for boltless steel shelving from Thailand were between \*\*\* percent above sales prices for the domestic product. Landed duty-paid costs for boltless steel shelving imported from Vietnam were below the sales price for U.S.-produced product in 29 of 35 instances (\*\*\* units); price-cost differentials ranged from \*\*\* percent. In the remaining 6 instances (\*\*\* units), landed duty-paid costs for boltless steel shelving from Vietnam were between \*\*\* percent above sales prices for the domestic product.

**Table V-15**

**Boltless steel shelving: Instances of lower and higher import purchase costs and the range and average of price-cost differentials, by product**

Quantity in units; price-cost differential in percent

Product	Type	Number of quarters	Quantity	Average price-cost differential	Min price-cost differential	Max price-cost differential
Product 1	Lower than U.S. price	11	***	***	***	***
Product 2	Lower than U.S. price	26	***	***	***	***
Product 3	Lower than U.S. price	19	***	***	***	***
Product 4	Lower than U.S. price	14	***	***	***	***
<b>All products</b>	<b>Lower than U.S. price</b>	70	***	***	***	***
Product 1	Higher than U.S. price	18	***	***	***	***
Product 2	Higher than U.S. price	8	***	***	***	***
Product 3	Higher than U.S. price	---	***	***	***	***
Product 4	Higher than U.S. price	5	***	***	***	***
<b>All products</b>	<b>Higher than U.S. price</b>	31	***	***	***	***

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.

Note: India purchase cost data were reported for only product 1; removing these observations, prices for imported product 1 were above those for U.S.-produced product in 11 instances, for a total of \*\*\* units with an average price differential of \*\*\* ranging between a low of \*\*\* and a high of \*\*\* for that product. The data for overselling for all products excluding India are presented in table V-19 as “all subject sources less India”.



**Table V-16**

**Boltless steel shelving: Instances of lower and higher import purchase costs and the range and average of price-cost differentials, by source**

Quantity in units; price-cost differential in percent

Source	Type	Number of quarters	Quantity	Average price-cost differential	Min price-cost differential	Max price-cost differential
India	Lower than U.S. price	---	***	***	***	***
Malaysia	Lower than U.S. price	13	***	***	***	***
Taiwan	Lower than U.S. price	7	***	***	***	***
Thailand	Lower than U.S. price	21	***	***	***	***
Vietnam	Lower than U.S. price	29	***	***	***	***
<b>All subject sources</b>	<b>Lower than U.S. price</b>	70	***	***	***	***
<b>All subject sources less India</b>	<b>Lower than U.S. price</b>	70	***	***	***	***
India	Higher than U.S. price	2	***	***	***	***
Malaysia	Higher than U.S. price	12	***	***	***	***
Taiwan	Higher than U.S. price	6	***	***	***	***
Thailand	Higher than U.S. price	5	***	***	***	***
Vietnam	Higher than U.S. price	6	***	***	***	***
<b>Total</b>	<b>Higher than U.S. price</b>	31	***	***	***	***
<b>Total less India</b>	<b>Higher than U.S. price</b>	29	***	***	***	***

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

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

## Lost sales and lost revenue

The Commission requested that U.S. producers of boltless steel shelving report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of boltless steel shelving from India, Malaysia, Taiwan, Thailand, and Vietnam during January 2020–December 2022. Of the two responding U.S. producers, \*\*\* reported that they had to either reduce prices or roll back announced price increases. \*\*\* submitted lost sales and lost revenue allegations, identifying 8 firms with which they lost sales or revenue (43 consisting lost sales allegations, 17 consisting of lost revenue allegations, and no allegations consisting of both types). \*\*\*.

Staff contacted 8 purchasers and received lost sales lost revenue surveys from 6 purchasers.<sup>14</sup> Responding purchasers reported purchasing and importing \*\*\* units of boltless steel shelving during January 2020–December 2022 (table V-17).

During 2022, responding purchasers purchased 80.2 percent from U.S. producers, 5.9 percent from Thailand, and 13.9 percent from nonsubject countries. Purchasers were asked about changes in their purchasing patterns from different sources since 2020. Of the responding six purchasers, four reported that their purchases from domestic producers steadily decreased or fluctuated down, one reported their purchases steadily increased, and two reported no change.<sup>15</sup> Explanations for decreasing purchases of domestic product included concerns around quality with Edsal because of its 2020 product recall, overall demand fluctuated down driven by advertising and promoting its products from Vietnam and other countries, and that its assortment was narrowed to top-selling products which happened to be those produced outside of the United States. Explanations for increasing purchases of boltless steel shelving from subject countries included increased demand for product and dedicated sourcing from vendors from Taiwan, and material price increases and pandemic-related supply chain issues was cited as the reason for increasing purchases from Thailand and Vietnam.

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<sup>14</sup> \*\*\*.

<sup>15</sup> Of the 6 responding purchasers, no purchasers indicated that they did not know the source of the boltless steel shelving they purchased.

Of the six responding purchasers, \*\*\* reported that, since 2020, it had purchased or imported boltless steel shelving from India, Malaysia, and Taiwan instead of U.S.-produced product while \*\*\* reported that it had purchased or imported boltless steel shelving from Taiwan and Thailand instead of U.S.-produced product. \*\*\* reported that they had purchased or imported boltless steel shelving from Vietnam instead of U.S.-produced product. Five purchasers reported that subject import prices were lower than U.S.-produced product, and four of these purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product; three purchasers reported that price was a primary reason for the decision to purchase imported product from Vietnam, while one purchaser each reported that price was a primary reason for boltless steel shelving from Taiwan and Thailand. Four purchasers estimated the quantity of boltless steel shelving from India purchased instead of domestic product; quantities ranged from \*\*\* units to \*\*\* units (tables V-18 and V-19). Purchasers identified quality and inventory concerns with Edsal and negotiating lower container costs instead of shipping rates as non-price reasons for purchasing imported rather than U.S.-produced product.

Of the six responding purchasers, one reported that U.S. producers had reduced prices in order to compete with lower-priced imports from Thailand and Vietnam; three reported that they did not know for each subject country with the exception of Vietnam and two purchasers reported that U.S. producers had not reduced prices in order to compete with lower priced imports (table V-20). The reported estimated price reduction was \*\*\* percent for Thailand and Vietnam. In describing the price reductions, purchaser \*\*\* indicated that at the end of 2022/beginning of 2023, U.S. producers were the last to implement adjusted reduced prices months after the rest of the industry.

**Table V-17****Boltless steel shelving: Purchasers' reported purchases and imports, by firm and source**

Quantity in units, share in percent

<b>Purchaser</b>	<b>Domestic quantity</b>	<b>Subject quantity</b>	<b>All other quantity</b>	<b>Change in domestic share</b>	<b>Change in subject country share</b>
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
Total	***	***	***	***	***

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

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

Note: Importer/purchaser \*\*\* purchases and imports were revised to reflect its revised importers' questionnaire response submitted on May 28, 2023.

**Table V-18****Boltless steel shelving: Purchasers' responses to purchasing subject imports instead of domestic product, by firm**

Quantity in units

<b>Purchaser</b>	<b>Purchased subject imports instead of domestic</b>	<b>Imports priced lower</b>	<b>Choice based on price</b>	<b>Quantity</b>	<b>Explanation</b>
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
Total	Yes--5; No--1	Yes--5; No--0	Yes--4; No--1	***	NA

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

**Table V-19**

**Boltless steel shelving: Purchasers' responses to purchasing subject imports instead of domestic product, by source**

Quantity in units

Source	Count of purchasers reporting subject instead of domestic	Count of purchasers reported that imports were priced lower	Count of purchasers reporting that price was a primary reason for shift	Quantity
India	1	1	---	***
Malaysia	1	1	---	***
Taiwan	2	2	1	***
Thailand	2	2	1	***
Vietnam	3	3	3	***
Any subject source	5	5	4	***

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

**Table V-20**

**Boltless steel shelving: Purchasers' responses to U.S. producer price reductions, by firm**

Purchaser	Reported producers lowered prices	Estimated percent of U.S. price reduction	Explanation
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
Total / average	Yes--1; No--2	***	NA

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

In responding to the lost sales lost revenue survey, some purchasers provided additional information on purchases and market dynamics. \*\*\* reported that it had not received a quote from a domestic manufacturer of boltless steel shelving. \*\*\*.



## Part VI: Financial experience of U.S. producers

### Background<sup>1</sup>

Two U.S. producers, Edsal and Tennsco, provided usable financial results on their Boltless Steel Shelving operations. Each of the two U.S. producers reported financial data on a calendar-year basis,<sup>2</sup> and each of the responding U.S. producers provided their financial data on the basis of GAAP. Both firms reported U.S. commercial sales, while \*\*\* reported exports. Neither firm reported internal consumption nor transfers to related firms. Edsal reported \*\*\*, while Tennsco \*\*\*.<sup>3</sup>

Figure VI-1 presents each responding firm's share of the total reported net sales quantity in 2022.

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<sup>1</sup> 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 expenses ("R&D expenses"), and return on assets ("ROA").

<sup>2</sup> \*\*\*. Data in the trade and financial sections of the Commission's questionnaire reconciled.

<sup>3</sup> In its U.S. producers' questionnaire response, \*\*\*. In response to ITC staff questions, \*\*\*. Email from \*\*\*, May 17, 2023.

**Figure VI-1**

**Boltless steel shelving: U.S. producers' share of net sales quantity in 2022, by firm**

\* \* \* \* \*

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

Note: The data used to calculate the firms' shares of total net sales quantity in Figure VI-1 are located in Table VI-3.

## **Operations on boltless steel shelving**

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



**Table VI-1****Boltless steel shelving: U.S. producers' results of operations, by item and period**

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

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

Table continued.

**Table VI-1 Continued****Boltless steel shelving: U.S. producers' results of operations, by item and period**

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

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

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

Note: Shares represent the share of COGS.

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

**Table VI-2**  
**Boltless steel shelving: Changes in AUVs between comparison periods**

Changes in percent

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

Table continued.

**Table VI-2 Continued**  
**Boltless steel shelving: Changes in AUVs between comparison periods**

Changes in dollars per unit

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

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

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 "---". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

**Table VI-3****Boltless steel shelving: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Net sales quantity**

Quantity in units

Firm	2020	2021	2022
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.

**Table VI-3 Continued****Boltless steel shelving: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Net sales value**

Value in 1,000 dollars

Firm	2020	2021	2022
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.

**Table VI-3 Continued****Boltless steel shelving: U.S. producers' sales, costs/expenses, and profitability, by firm and period****COGS**

Value in 1,000 dollars

Firm	2020	2021	2022
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.

**Table VI-3 Continued****Boltless steel shelving: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Gross profit or (loss)**

Value in 1,000 dollars

Firm	2020	2021	2022
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.

**Table VI-3 Continued**

**Boltless steel shelving: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**SG&A expenses**

Value in 1,000 dollars

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.

**Table VI-3 Continued**

**Boltless steel shelving: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Operating income or (loss)**

Value in 1,000 dollars

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.

**Table VI-3 Continued**

**Boltless steel shelving: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Net income or (loss)**

Value in 1,000 dollars

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.

**Table VI-3 Continued**

**Boltless steel shelving: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**COGS to net sales ratio**

Ratios in percent

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.

**Table VI-3 Continued**

**Boltless steel shelving: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Gross profit or (loss) to net sales ratio**

Ratios in percent

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.

**Table VI-3 Continued**

**Boltless steel shelving: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**SG&A expenses to net sales ratio**

Ratios in percent

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.

**Table VI-3 Continued**

**Boltless steel shelving: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Operating income or (loss) to net sales ratio**

Ratios in percent

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.

**Table VI-3 Continued**

**Boltless steel shelving: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Net income or (loss) to net sales ratio**

Ratios in percent

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.

**Table VI-3 Continued**

**Boltless steel shelving: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit net sales value**

Unit values in dollars per unit

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.

**Table VI-3 Continued**

**Boltless steel shelving: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit raw material costs**

Unit values in dollars per unit

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.

**Table VI-3 Continued**

**Boltless steel shelving: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit direct labor costs**

Unit values in dollars per unit

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.

**Table VI-3 Continued**

**Boltless steel shelving: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit other factory costs**

Unit values in dollars per unit

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.

**Table VI-3 Continued****Boltless steel shelving: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit COGS**

Unit values in dollars per unit

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.

**Table VI-3 Continued****Boltless steel shelving: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit gross profit or (loss)**

Unit values in dollars per unit

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.

**Table VI-3 Continued****Boltless steel shelving: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit SG&A expenses**

Unit values in dollars per unit

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.

**Table VI-3 Continued****Boltless steel shelving: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit operating income or (loss)**

Unit values in dollars per unit

<b>Firm</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

Table continued.



**Table VI-3 Continued**

**Boltless steel shelving: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

Unit net income or (loss)			
Unit values in dollars per unit			
Firm	2020	2021	2022
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

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

## Net sales

As shown in tables VI-1 and VI-3, total net sales, by quantity, decreased from 2020 to 2022 (\*\*\*). Net sales, by quantity, reported by \*\*\*. Total net sales, by value, irregularly increased between 2020 and 2022, by \$\*\*\* or \*\*\* percent. Sales values of each firm changed in the same direction: an \*\*\*. As shown in table VI-2, the average unit values of sales for the two firms together increased by \$\*\*\* per unit between 2020 and 2021 and \$\*\*\* per unit between 2021 and 2022, for a total change of an increase of \$\*\*\* per unit or \*\*\* between 2020 and 2022.

Differences in unit values between firms may be attributable to the different types of boltless steel shelving that each firm produces, different customers, and differences in how prices are set between U.S. producers and customers. Each of the two U.S. producers in their questionnaire responses showed that \*\*\*.<sup>4</sup> Edsal stated that its products were subject to line reviews by major retailers that had the main purpose of having sellers of boltless steel shelving compete on price.<sup>5</sup>

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<sup>4</sup> Tennsco produced \*\*\*. In addition, \*\*\*. U.S. producer's questionnaire, section II-9; also, a comparison of customer identification lists (section IV-24) indicates \*\*\*. In response to a staff inquiry as to why \*\*\*. Email from \*\*\*, May 15, 2023.

<sup>5</sup> Conference transcript, p. 25 (Krueger). In this industry, there are no formal contracts. Conference transcript, p. 61 (Morey).

Edsal stated that \*\*\*.<sup>6</sup>

### **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 2022 (table VI-1). Table VI-4 presents raw materials, by type.<sup>7</sup> Fluctuations in raw material costs were due to changes in input prices, and the steel vertical and horizontal supports drove the cost of the boltless steel shelving.<sup>8</sup> Edsal stated that there were significant increases in steel costs during 2020-2022.<sup>9</sup>

Raw material costs irregularly increased by \*\*\* percent, from \$\*\*\* to \$\*\*\* during 2020-2022 reflecting increased costs of steel, which is used mostly in the vertical and horizontal supports of a unit as well as hardware supplied and some of the decking. On an average per unit basis, raw material costs increased from \$\*\*\* in 2020 to \$\*\*\* in 2022 reflecting the increase in costs and the decrease in sales volume. As a ratio to net sales, raw material costs irregularly increased, from \*\*\* percent in 2020 to \*\*\* percent in 2022 primarily reflecting the greater increase in costs compared to revenue over the same period. Each firm's raw material costs were directionally the same. Because \*\*\* accounted for most of the changes.

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<sup>6</sup> Edsal's postconference brief, p. 38, footnote 28.

<sup>7</sup> \*\*\* reported purchasing raw material inputs from related firms. U.S. producer's questionnaire, section III-5.

<sup>8</sup> Conference transcript, pp. 67-68 (White).

<sup>9</sup> Conference transcript, p. 67 (White).

**Table VI-4**  
**Boltless steel shelving: U.S. Producers' raw material costs in 2022**

Value in 1,000 dollars; unit values in dollars per unit; share of value in percent

Item	Value	Unit value	Share of value
Steel vertical and horizontal supports	***	***	***
Decking materials	***	***	***
Packaging material	***	***	***
Other material inputs	***	***	***
All raw materials	***	***	***

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

Note: Decking materials include steel, particle board, laminated board; packaging materials include cardboard, plastic wrap, and foam; other material inputs include paint, hardware, and pallets.

Direct labor costs, accounting for the second largest share of total COGS, decreased by \*\*\* percent from 2020 to 2022, from \$\*\*\* to \$\*\*\*. On an average per unit basis, direct labor costs increased from \$\*\*\* in 2020 to \$\*\*\* in 2022, reflecting the lower number of units sold in 2022 than in 2020. As a ratio to net sales, direct labor costs declined from \*\*\* percent in 2020 to \*\*\* percent in 2021. \*\*\*. Directionally, \*\*\*.

Other factory costs, accounting for the smallest share of total COGS, increased irregularly by \*\*\* percent from \$\*\*\* in 2020 to \$\*\*\* in 2022. On an average per unit basis, other factory costs increased from \$\*\*\* in 2020 to \$\*\*\* in 2022. \*\*\*. As a ratio to net sales, other factory costs irregularly decreased between 2020 and 2022, reflecting the greater increase in sales value compared with other factory costs.

Overall, total COGS increased irregularly by \*\*\* percent from 2020 to 2022, from \$\*\*\* to \$\*\*\*, primarily due to the increase in raw material costs during the same period. \*\*\* values of total COGS in 2022 than in 2020. On an average per unit basis, COGS increased from \$\*\*\* in 2020 to \$\*\*\* in 2022. The COGS to net sales ratio increased from \*\*\* percent in 2020 to \*\*\* percent in 2022.

As seen in table VI-1, total gross profit fell from 2020 (\$\*\*\*) to 2021 (\$\*\*\*) and was \$\*\*\* in 2022.<sup>10</sup> Reflecting the underlying values and relationship between COGS and quantity of net sales, on an average unit value basis, gross profit fell from

<sup>10</sup> Between 2020 and 2022, \*\*\*.

\$\*\*\* in 2020 to \$\*\*\* in 2021 and was \$\*\*\* in 2022. Reflecting the underlying values and relationship between COGS and the value of net sales, the ratio of gross profit to net sales declined from \*\*\* percent in 2020 to \*\*\* percent in 2021 and was \*\*\* percent in 2022.

## **SG&A expenses and operating income or loss**

U.S. producers' SG&A expenses increased by \*\*\* percent from 2020 (\$\*\*\*) to 2022 (\$\*\*\*). The corresponding SG&A expense ratio (total SG&A expenses divided by total sales value) irregularly increased from \*\*\* percent in 2020 to \*\*\* percent in 2021 and was \*\*\* percent in 2022. The average unit value increased from \$\*\*\* in 2020 to \$\*\*\* in 2021 to \$\*\*\* in 2022. The changes in the ratio and per-unit values reflected the increase in SG&A expenses and decrease in sales. Directionally, SG&A expenses of \*\*\*.<sup>11</sup> \*\*\*.<sup>12</sup>

The Consumer Product Safety Commission ("CPSC") announced a 2.2-million-unit recall for four models of Edsal's boltless steel shelving that were sold from January 2015 to September 2020. The recall was voluntary on Edsal's part and announced in February 2021.<sup>13</sup> Edsal stated that the recall resulted in \*\*\*. These values were included in SG&A expenses in the years in which they were incurred.<sup>14</sup>

As presented in table VI-1, U.S. producers' operating income markedly fell from \$\*\*\* in 2020 to \$\*\*\* in 2021, and then rose to \$\*\*\* in 2022. The operating

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<sup>11</sup> As shown in table VI-3 \*\*\*. Email from \*\*\*, May 17, 2023. A spokesman for Tennsco explained that \*\*\*. Email from \*\*\*, May 15, 2023.

<sup>12</sup> \*\*\*. Email from \*\*\*, May 25, 2023.

<sup>13</sup> U.S. Consumer Product Safety Commission ("CPSC"), "Edsal Recalls 2.2 Million Shelving Units Due to Injury Hazard," recall No. 21-076, February 10, 2021, <https://www.cpsc.gov/Recalls/2021/Edsal-Recalls-2-2-Million-Shelving-Units-Due-to-Injury-Hazard>.

<sup>14</sup> Email from \*\*\*, May 25, 2023.

income ratio (operating income or loss to total net sales) followed the underlying values of each, falling from \*\*\* percent in 2020 to \*\*\* percent in 2021 and was \*\*\* percent in 2022. The trend of unit value of operating income or loss was similar to that of the underlying values of net sales quantity and operating profitability.<sup>15</sup>

### **All other expenses and net income or loss**

Interest expense was reported \*\*\*: total interest expense increased from \$\*\*\* in 2020 to \$\*\*\* in 2021 to \$\*\*\* in 2022.<sup>16</sup> No firm reported any values under the category of other expense and the category of other income.

Based on the changes in operating income/(loss) and total interest expense, net income fell from a positive \$\*\*\* in 2020 to a net loss of \$\*\*\* in 2021 and there was a loss of \$\*\*\* in 2022. As shown in table VI-3, \*\*\*. The ratio of net income/(loss) to sales following the trend of the underlying data; it fell from \*\*\* percent to a negative \*\*\* percent between 2020 and 2021 and was a negative \*\*\* percent in 2022.

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<sup>15</sup> As shown in table VI-3, \*\*\*. The magnitude of the change for the two firms together was \*\*\*.

<sup>16</sup> \*\*\*. Email from \*\*\*, May 17, 2023.

## Variance analysis

A variance analysis for the operations of U.S. producers of boltless steel shelving is presented in table VI-5.<sup>17</sup> The information for this variance analysis is derived from table VI-1.<sup>18</sup> Operating income declined by \$\*\*\* between 2020 and 2022: The sales price variance rose for all years of the POI, reflecting an increase in unit sales values; however, the increase was less than the increase in total costs and expenses (unit COGS and unit SG&A expenses increased) combined with the unfavorable volume variance. Between 2021 and 2022 operating income rose by \$\*\*\* because the favorable price variance (unit sales values increased) was greater than the unfavorable variances of cost and expense (unit COGS and SG&A expenses rose). The operating income volume variance, which was unfavorable, was small between the two years.

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<sup>17</sup> The Commission's variance analysis is calculated in three parts: Sales variance, cost of sales variance (COGS variance), and SG&A expense variance. Each part consists of a price variance (in the case of the sales variance) or a cost or expense variance (in the case of the COGS and SG&A expense variance), and a volume variance. The sales or cost/expense variance is calculated as the change in unit price or per-unit cost/expense times the new volume, while the volume variance is calculated as the change in volume times the old unit price or per-unit cost/expense. Summarized at the bottom of the table, the price variance is from sales; the cost/expense variance is the sum of those items from COGS and SG&A variances, respectively, and the volume variance is the sum of the volume components of the net sales, COGS, and SG&A expense variances. The overall volume component of the variance analysis is generally small.

<sup>18</sup> In this variance analysis, \*\*\*. Edsal reported that \*\*\*. Email from \*\*\*, May 17, 2023.

**Table VI-5****Boltless steel shelving: Variance analysis on the operations of U.S. producers between comparison periods**

Value in 1,000 dollars

Item	2020-22	2020-21	2021-22
Net sales price variance	***	***	***
Net sales volume variance	***	***	***
Net sales total variance	***	***	***
COGS cost variance	***	***	***
COGS volume variance	***	***	***
COGS total variance	***	***	***
Gross profit variance	***	***	***
SG&A cost variance	***	***	***
SG&A volume variance	***	***	***
SG&A total variance	***	***	***
Operating income price variance	***	***	***
Operating income cost variance	***	***	***
Operating income volume variance	***	***	***
Operating income total variance	***	***	***

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

Note: These data are derived from the data in table VI-1. Unfavorable variances (which are negative) are shown in parentheses, all others are favorable (positive).

**Capital expenditures and research and development expenses**

Table VI-6 presents capital expenditures, by firm, and table VI-8 presents R&D expenses, by firm. Tables VI-7 and VI-9 present the firms' narrative explanations of the nature, focus, and significance of their capital expenditures and R&D expenses, respectively. \*\*\* reported capital expenditures. Total capital expenditures increased irregularly by \*\*\* percent between 2020 and 2022. \*\*\*.<sup>19</sup>

R&D expenses \*\*\* noticeably increased between 2020 (\$\*\*\*) and 2022 (\$\*\*\*). \*\*\*

<sup>19</sup> Email from \*\*\*, May 17, 2023.

explained that \*\*\*.<sup>20</sup>

**Table VI-6**  
**Boltless steel shelving: U.S. producers' capital expenditures, by firm and period**

Value in 1,000 dollars

Firm	2020	2021	2022
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

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

**Table VI-7**  
**Boltless steel shelving: U.S. producers' narrative descriptions of their capital expenditures, by firm**

Firm	Narrative on capital expenditures
Edsal	***
Tennsco	***

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

**Table VI-8**  
**Boltless steel shelving: U.S. producers' R&D expenses, by firm and period**

Value in 1,000 dollars

Firm	2020	2021	2022
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

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

**Table VI-9**  
**Boltless steel shelving: U.S. producers' narrative descriptions of their R&D expenses, by firm**

Firm	Narrative on R&D expenses
Edsal	***
Tennsco	***

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

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<sup>20</sup> Email from \*\*\*, May 17, 2023.



## Assets and return on assets

Table VI-10 presents data on the U.S. producers' total assets while table VI-11 presents their operating return on assets ("ROA").<sup>21</sup> Table VI-12 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time. \*\*\*.<sup>22</sup>

**Table VI-10**

**Boltless steel shelving: U.S. producers' total net assets, by firm and period**

Value in 1,000 dollars

Firm	2020	2021	2022
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

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

**Table VI-11**

**Boltless steel shelving: U.S. producers' ROA, by firm and period**

Ratio in percent

Firm	2020	2021	2022
Edsal	***	***	***
Tennsco	***	***	***
All firms	***	***	***

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

**Table VI-12**

**Boltless steel shelving: U.S. producers' narrative descriptions of their total net assets, by firm**

Firm	Narrative on assets
Edsal	***
Tennsco	***

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

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<sup>21</sup> 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.

<sup>22</sup> Email from \*\*\*, May 17, 2023.

## Capital and investment

The Commission requested U.S. producers of boltless steel shelving to describe any actual or potential negative effects of imports of boltless steel shelving from India, Malaysia, Taiwan, Thailand, and Vietnam on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table VI-13 presents the number of firms reporting an impact in each category and table VI-14 provides the U.S. producers' narrative responses.

**Table VI-13**

**Boltless steel shelving: Count of firms indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2020, by effect**

Number of firms reporting

Effect	Category	Count
Cancellation, postponement, or rejection of expansion projects	Investment	***
Denial or rejection of investment proposal	Investment	***
Reduction in the size of capital investments	Investment	***
Return on specific investments negatively impacted	Investment	***
Other investment effects	Investment	***
Any negative effects on investment	Investment	***
Rejection of bank loans	Growth	***
Lowering of credit rating	Growth	***
Problem related to the issue of stocks or bonds	Growth	***
Ability to service debt	Growth	***
Other growth and development effects	Growth	***
Any negative effects on growth and development	Growth	***
Anticipated negative effects of imports	Future	***

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

**Table VI-14****Boltless steel shelving: U.S. Producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2020**

<b>Item</b>	<b>Firm name and narrative on impact of imports</b>
Cancellation, postponement, or rejection of expansion projects	***
Other negative effects on investments	***
Ability to service debt	***
Other effects on growth and development	***
Anticipated effects of imports	***
Anticipated effects of imports	***

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



## Part VII: Threat considerations and information on nonsubject countries

Section 771(7)(F)(i) of the Act (19 U.S.C. § 1677(7)(F)(i)) provides that—

*In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors<sup>1</sup>--*

- (I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,*
- (II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,*
- (III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,*
- (IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports,*
- (V) inventories of the subject merchandise,*

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<sup>1</sup> Section 771(7)(F)(ii) of the Act (19 U.S.C. § 1677(7)(F)(ii)) provides that “The Commission shall consider {these factors} . . . as a whole in making a determination of whether further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted under this title. The presence or absence of any factor which the Commission is required to consider . . . shall not necessarily give decisive guidance with respect to the determination. Such a determination may not be made on the basis of mere conjecture or supposition.”

- (VI) *the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products,*
- (VII) *in any investigation under this title which involves imports of both a raw agricultural product (within the meaning of paragraph (4)(E)(iv)) and any product processed from such raw agricultural product, the likelihood that there will be increased imports, by reason of product shifting, if there is an affirmative determination by the Commission under section 705(b)(1) or 735(b)(1) with respect to either the raw agricultural product or the processed agricultural product (but not both),*
- (VIII) *the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and*
- (IX) *any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).<sup>2</sup>*

Information on the volume and pricing of imports of the subject merchandise is presented in Parts IV and V; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in Part VI. Information on inventories of the subject merchandise; foreign producers' operations, including the potential for "product-shifting;" any other threat indicators, if applicable; and any dumping in third-country markets, follows. Also presented in this section of the report is information obtained for consideration by the Commission on nonsubject countries.

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<sup>2</sup> Section 771(7)(F)(iii) of the Act (19 U.S.C. § 1677(7)(F)(iii)) further provides that, in antidumping investigations, "... the Commission shall consider whether dumping in the markets of foreign countries (as evidenced by dumping findings or antidumping remedies in other WTO member markets against the same class or kind of merchandise manufactured or exported by the same party as under investigation) suggests a threat of material injury to the domestic industry."

## The industry in India

The Commission issued foreign producers' or exporters' questionnaires to three firms believed to produce and/or export boltless steel shelving from India.<sup>3</sup> Usable responses to the Commission's questionnaire were received from one firm, Triune.<sup>4</sup> Triune's exports to the United States accounted for all apparent U.S. imports of boltless steel shelving from India in 2022.<sup>5</sup> According to estimates requested of Triune, its reported production in 2022 accounts for 100.0 percent of overall production of boltless steel shelving in India. Table VII-1 presents information on the boltless steel shelving operations of Triune.

**Table VII-1**  
**Boltless steel shelving: Summary data for the producer in India, 2022**

<b>Firm</b>	<b>Production (units)</b>	<b>Share of reported production (percent)</b>	<b>Exports to the United States (units)</b>	<b>Share of reported exports to the United States (percent)</b>	<b>Total shipments (units)</b>	<b>Share of firm's total shipments exported to the United States (percent)</b>
Triune	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Table VII-2 presents events in India's industry since January 1, 2020.

<sup>3</sup> These firms were identified through a review of information submitted in the petition.

<sup>4</sup> According to Triune, neither of the other companies contacted, Tmte Metal Tech Pvt. Ltd. and Jayalaxmi Flexible Systems, produced boltless steel shelving or exported it to the U.S. since 2020. Triune's postconference brief, p. 9. Tmte Metal Tech Pvt. Ltd. submitted a questionnaire response certifying \*\*\*. These three firms were the only firms identified by the petitioner as being potential producers or exporters of boltless steel shelving in India. Petition, exh. Gen-7.

<sup>5</sup> Based on a comparison of Triune's reported exports to imports from India reported in questionnaire data in 2022. According to the firm's estimates in its questionnaire response, it accounted for \*\*\* percent of total exports from India to the U.S. in 2022. See also Triune's postconference brief, pp. 8-10.

**Table VII-2****Boltless steel shelving: Important industry events in India since January 1, 2020**

Item	Firm	Event
New producer	Triune	*** — Triune was established in *** to design, manufacture, and sell a commercially viable mix of fabricated steel products as a contract producer for importer JS Products Inc. (“JS Products”) of Las Vegas, Nevada. Construction of Triune’s new facility, located in Sri City in the southeastern state of Andhra Pradesh, ***.
Production facility start-up	Triune	October 2021— Triune’s initial-phase commercial production focused on bolted steel shelving *** and boltless steel shelving ***. Subsequent production phases expanded to include various other non-shelving steel products that otherwise require much of the same equipment, particularly for powder coating, needed to produce steel shelving.
Product shifts	Triune	January–September 2023— Triune claims ***, reflects the planned shift toward expanded allocations of its manufacturing capabilities toward various nonsubject products rather than the subject boltless steel shelving.

Source: Triune’s postconference brief, Responses to Staff Questions, pp. 1–3, 6–7;  
 JS Products, “About JS Products” web page, 2023, <https://www.jsproducts.com/>, retrieved May 24, 2023;  
 Triune, “Home” web page, 2023, <http://triunetchnofab.com/>, retrieved May 24, 2023;  
 Triune, “Contact Us” web page, 2023, <http://triunetchnofab.com/contact-us/>, retrieved May 24, 2023;  
 Triune’s postconference brief, pp. 15–16;  
 Triune’s postconference brief, Responses to Staff Questions, p. 2; and  
 Triune’s postconference brief, p. 21, exh. 2: Customer Correspondence and Orders.

**Changes in operations**

Producers in India were asked to report any change in the character of their operations or organization relating to the production of boltless steel shelving since January 1, 2020. Table VII-3 presents the changes identified by the producer.



**Table VII-3****Boltless steel shelving: Reported changes in operations in India since January 1, 2020, by firm**

Item	Firm name and accompanying narrative response
Plant openings	***

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

## Operations on boltless steel shelving

Table VII-4 presents data on Triune's installed capacity, practical overall capacity, and practical boltless steel shelving capacity, and production on the same equipment. Triune first began producing certain nonsubject products in late 2021, before starting production of boltless steel shelving in 2022.<sup>6</sup>

**Table VII-4****Boltless steel shelving: Triune's installed and practical capacity and production on the same equipment as subject production, by period**

Capacity and production in units; utilization in percent

Item	Measure	2020	2021	2022
Installed overall	Capacity	***	***	***
Installed overall	Production	***	***	***
Installed overall	Utilization	***	***	***
Practical overall	Capacity	***	***	***
Practical overall	Production	***	***	***
Practical overall	Utilization	***	***	***
Practical boltless steel shelving	Capacity	***	***	***
Practical boltless steel shelving	Production	***	***	***
Practical boltless steel shelving	Utilization	***	***	***

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

<sup>6</sup> Conference transcript, p. 95 (Miranda). Triune commenced production of bolted steel shelving in \*\*\* to fulfill new orders from \*\*\*, and then added production of boltless steel shelving in \*\*\*. Triune's postconference brief, responses to staff questions, p. 2.

Table VII-5 presents Triune’s reported capacity constraints since January 1, 2020.

**Table VII-5**

**Boltless steel shelving: Triune’s reported capacity constraints since January 1, 2020**

Item	Firm name and narrative response on constraints to practical overall capacity
Production bottlenecks	***
Existing labor force	***
Other constraints	***

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

Table VII-6 presents information on the boltless steel shelving operations of Triune. Though Triune \*\*\* in 2021, it didn’t begin production until 2022. Nearly \*\*\* percent of its production was \*\*\*, with the remainder being reported as \*\*\*. The firm explained its 2023 and 2024 projections by reporting: “\*\*\*.”<sup>7</sup>

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<sup>7</sup> Triune’s foreign producers’ questionnaire response. These projections \*\*\*. See Triune’s postconference brief, responses to staff questions, p. 8, and email from \*\*\* to Commission staff, May 30, 2023.

**Table VII-6**  
**Boltless steel shelving: Data on industry in India, by period**

Quantity in units

Item	2020	2021	2022	Projection 2023	Projection 2024
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Internal consumption	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Home market shipments	***	***	***	***	***
Exports to the United States	***	***	***	***	***
Exports to all other markets	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***

Table continued.

**Table VII-6 Continued**  
**Boltless steel shelving: Data on industry in India, by period**

Shares and ratios in percent

Item	2020	2021	2022	Projection 2023	Projection 2024
Capacity utilization ratio	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***
Internal consumption share	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***
Home market shipments share	***	***	***	***	***
Exports to the United States share	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***
Export shipments share	***	***	***	***	***
Total shipments share	***	***	***	***	***

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

## Alternative products

As shown in table VII-7, responding firms in India produced other products on the same equipment and machinery used to produce boltless steel shelving. In its questionnaire response, Triune reports that its production of other products from 2020-22 only included \*\*\*. In its postconference brief, the firm also reported being able to produce \*\*\*.<sup>8</sup>

**Table VII-7**  
**Boltless steel shelving: Triune's overall production on the same equipment as subject production, by period**

Quantity in units; shares in percent

Product type	Measure	2020	2021	2022
Boltless steel shelving	Quantity	***	***	***
Other products	Quantity	***	***	***
All products	Quantity	***	***	***
Boltless steel shelving	Share	***	***	***
Other products	Share	***	***	***
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. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

## Exports

According to GTA, the leading export markets for metal furniture, other than for offices, which includes boltless steel shelving, from India are those in the United States and Western Europe (table VII-8). During 2022, the United States was the top export market for metal furniture, other than for offices, accounting for 52.2 percent, followed by the Netherlands, accounting for 10.0 percent. Together, these top two destination markets accounted for 62.2 percent of all worldwide destination markets for India in that year.

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<sup>8</sup> Triune's postconference brief, responses to staff questions, p. 2. \*\*\*. Email from \*\*\* to Commission staff, May 30, 2023.

**Table VII-8****Metal furniture, other than for offices: Exports from India, by destination market and by period**

Value in 1,000 dollars; shares in percent

Destination market	Measure	2020	2021	2022
United States	Value	70,851	130,171	156,554
Netherlands	Value	19,218	35,174	29,971
Germany	Value	8,665	15,493	14,655
United Kingdom	Value	9,243	16,667	13,984
France	Value	6,575	13,752	13,529
United Arab Emirates	Value	3,472	6,866	9,265
Canada	Value	3,819	8,562	8,505
Saudi Arabia	Value	4,129	7,673	5,878
Spain	Value	3,648	5,589	5,751
All other destination markets	Value	23,863	41,541	41,814
All destination markets	Value	153,481	281,487	299,905
United States	Share	46.2	46.2	52.2
Netherlands	Share	12.5	12.5	10.0
Germany	Share	5.6	5.5	4.9
United Kingdom	Share	6.0	5.9	4.7
France	Share	4.3	4.9	4.5
United Arab Emirates	Share	2.3	2.4	3.1
Canada	Share	2.5	3.0	2.8
Saudi Arabia	Share	2.7	2.7	2.0
Spain	Share	2.4	2.0	1.9
All other destination markets	Share	15.5	14.8	13.9
All destination markets	Share	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 9403.20 as reported by Indian Ministry of Commerce in the Global Trade Atlas Suite, accessed May 15, 2023.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "----". United States is shown at the top, all remaining top export destinations shown in descending order of 2022 data. At the six-digit level, the merchandise exports presented in this table cover more merchandise than just boltless steel shelving.

## The industry in Malaysia

The Commission issued foreign producers' or exporters' questionnaires to two firms believed to produce and/or export boltless steel shelving from Malaysia and for which contact information was obtainable: Eonmetall Industries Sdn. Bhd. ("Eonmetall"), and E Storage System Sdn. Bhd.<sup>9</sup> Neither firm submitted responses to the Commission's questionnaire. Table VII-9 presents events in Malaysia's industry since January 1, 2020.

**Table VII-9**  
**Boltless steel shelving: Important industry events in Malaysia since January 1, 2020**

Item	Firm	Event
Product sales prospects	Eonmetall	July 2022— The Chief Executive Officer ("CEO") of Eonmetall — a producer of steel racking and storage systems at its facility in Batu Kawan, Penang— reportedly foresees continued robust demand for its steel racking systems by expanding logistics warehouse capacity construction driven by the e-commerce boom. By contrast, the CEO also reportedly noted slowing prospects for Eonmetall's steel shelving especially for the retail market as high inflation adversely impacts consumer discretionary spending.
Market entry	Eonmetall	February 2023— After Eonmetall entered the U.S. market nearly two years ago, U.S. sales are the main contributor to corporate revenue, according to an interview with its CEO. Moreover, the CEO also reported that almost one-half of Eonmetall's U.S. revenue is generated from sales of steel shelving products, which would include boltless steel shelving.
New facility	Eonmetall	February 2023— Despite concerns of a U.S. economic slowdown this year, Eonmetall is still reportedly planning to construct a new manufacturing facility in Kapar, Selangor. Construction will be in two phases with the first phase anticipated for completion by early-2024. Completing this phase will almost double the firm's manufacturing capacity. According to Eonmetall's CEO, "the new plant will give us a leg-up to capture the market when it recovers. Our current capacity will not be enough to capture any new opportunities."

Source: Shazni Ong, "Demand for Steel Racking Systems Robust as E-Commerce Fuels Warehouse Expansion, Says Eonmetall CEO," The Edge Malaysia, July 22, 2022, <https://theedgemaalaysia.com/article/demand-steel-racking-systems-robust-ecommerce-fuels-warehouse-expansion-says-eonmetall-ceo>; and Intan Farhana Zainul, "US-China Trade Tensions a Tailwind for Steel Player Eonmetall," The Edge Malaysia, February 22, 2023, <https://theedgemaalaysia.com/node/655125>.

<sup>9</sup> These firms were identified through a review of information submitted in the petition.

## Exports

According to GTA, the leading export markets for metal furniture, other than for offices, which includes boltless steel shelving, from Malaysia are those in the United States, Southeast and East Asia, and Oceania (table VII-10). During 2022, the United States was the top export market for metal furniture, other than for offices, accounting for 39.9 percent, followed by Singapore, accounting for 22.2 percent. Together, these top two destination markets accounted for 62.1 percent of all worldwide destination markets for Malaysia in that year.

**Table VII-10**

**Metal furniture, other than for offices: Exports from Malaysia, by destination market and by period**

Value in 1,000 dollars; shares in percent

Destination market	Measure	2020	2021	2022
United States	Value	54,842	55,685	54,080
Singapore	Value	17,341	22,865	30,109
Philippines	Value	1,898	3,148	7,361
Australia	Value	5,621	3,860	6,786
Japan	Value	13,985	10,116	6,724
Thailand	Value	3,412	5,176	6,331
Indonesia	Value	938	997	2,899
United Arab Emirates	Value	1,966	1,411	2,759
Canada	Value	507	1,345	2,008
All other destination markets	Value	16,032	14,786	16,514
All destination markets	Value	116,542	119,388	135,570
United States	Share	47.1	46.6	39.9
Singapore	Share	14.9	19.2	22.2
Philippines	Share	1.6	2.6	5.4
Australia	Share	4.8	3.2	5.0
Japan	Share	12.0	8.5	5.0
Thailand	Share	2.9	4.3	4.7
Indonesia	Share	0.8	0.8	2.1
United Arab Emirates	Share	1.7	1.2	2.0
Canada	Share	0.4	1.1	1.5
All other destination markets	Share	13.8	12.4	12.2
All destination markets	Share	100.0	100.0	100.0

Source: Official export statistics under HS subheading 9403.20 as reported by the Department of Statistics Malaysia in the Global Trade Atlas database, accessed May 15, 2023.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top, all remaining top export destinations shown in descending order of 2022 data. At the six-digit level, the merchandise exports presented in this table cover more merchandise than just boltless steel shelving.

## The industry in Taiwan

The Commission issued foreign producers' or exporters' questionnaires to one firm believed to produce and/or export boltless steel shelving from Taiwan.<sup>10</sup> This firm, Taiwan Shin Yeh Enterprise Co., Ltd. ("Shin Yeh"), submitted a usable response to the Commission's questionnaire. Shin Yeh's exports to the United States accounted for approximately all apparent U.S. imports of boltless steel shelving from Taiwan in 2022.<sup>11</sup> According to Shin Yeh's estimates, it accounted for \*\*\* percent of overall production of boltless steel shelving in Taiwan in 2022. Table VII-11 presents information on the boltless steel shelving operations of Shin Yeh.

**Table VII-11**  
**Boltless steel shelving: Summary data for Shin Yeh, 2022**

<b>Firm</b>	<b>Production (units)</b>	<b>Share of reported production (percent)</b>	<b>Exports to the United States (units)</b>	<b>Share of reported exports to the United States (percent)</b>	<b>Total shipments (units)</b>	<b>Share of firm's total shipments exported to the United States (percent)</b>
Taiwan Shin Yeh	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

There were no major developments in Taiwan's industry since January 1, 2020, identified by interested parties in the proceeding and no relevant information from outside sources was found.

## Changes in operations

Producers in Taiwan were asked to report any change in the character of their operations or organization relating to the production of boltless steel shelving since 2020. Table VII-12 presents the changes identified by Shin Yeh.

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<sup>10</sup> This firm was identified through a review of information submitted in the petition.

<sup>11</sup> Based on a comparison of Shin Yeh's reported exports to imports from Taiwan reported in questionnaire data in 2022. According to the firm's estimates in its questionnaire response, it accounted for \*\*\* percent of total exports from Taiwan to the U.S. in 2022.



**Table VII-12****Boltless steel shelving: Reported changes in operations in Taiwan since January 1, 2020, by firm**

Item	Firm name and accompanying narrative response
Acquisitions	***

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

**Operations on boltless steel shelving**

Table VII-13 presents data on Shin Yeh's installed capacity, practical overall capacity, and practical boltless steel shelving capacity and production on the same equipment. Shin Yeh's installed overall capacity maintained consistent levels from 2020-2022, while installed overall production increased \*\*\* percent from 2020-22, resulting in an increase in installed overall capacity utilization of \*\*\* percentage points from 2020-22. Practical overall capacity and practical boltless steel shelving capacity also operated at consistent levels from 2020-22, while practical overall production increased \*\*\* percent and boltless steel shelving production increased \*\*\* percent. This resulted in respective increases in capacity utilization of \*\*\* percentage points (practical overall utilization) and \*\*\* percentage points (boltless steel shelving utilization).

**Table VII-13****Boltless steel shelving: Shin Yeh's installed and practical capacity and production on the same equipment as subject production, by period**

Capacity and production in units; utilization in percent

Item	Measure	2020	2021	2022
Installed overall	Capacity	***	***	***
Installed overall	Production	***	***	***
Installed overall	Utilization	***	***	***
Practical overall	Capacity	***	***	***
Practical overall	Production	***	***	***
Practical overall	Utilization	***	***	***
Practical boltless steel shelving	Capacity	***	***	***
Practical boltless steel shelving	Production	***	***	***
Practical boltless steel shelving	Utilization	***	***	***

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

Table VII-14 presents Shin Yeh's reported capacity constraints since January 1, 2020.

**Table VII-14****Boltless steel shelving: Shin Yeh's reported capacity constraints since January 1, 2020**

Item	Firm name and narrative response on constraints to practical overall capacity
Production bottlenecks	***
Other constraints	***

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

Table VII-15 presents information on the boltless steel shelving operations of the responding producers and exporters in Taiwan. As discussed previously, Shin Yeh's capacity utilization for boltless steel shelving increased by \*\*\* percentage points from 2020-22 as the firm's production increased while its capacity remained constant. The majority of Shin Yeh's shipments were exports to the United States in all periods (at least \*\*\* percent from 2020-22), followed by exports to other markets and lastly home market shipments. Exports to the United States increased \*\*\* percent from 2020-22, while home market shipments increased \*\*\* percent. Export shipments to other markets decreased from 2020 to 2021, but increased from 2021 to 2022. Overall, exports to all other markets decreased \*\*\* percent from 2020-22. The firm explained its projections as follows: "\*\*\*\*."<sup>12</sup>

**Table VII-15**  
**Boltless steel shelving: Data on industry in Taiwan, by period**

Quantity in units

Item	2020	2021	2022	Projection 2023	Projection 2024
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Internal consumption	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Home market shipments	***	***	***	***	***
Exports to the United States	***	***	***	***	***
Exports to all other markets	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***

Table continued.

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<sup>12</sup> Shin Yeh's foreign producers' questionnaire response.

**Table VII-15 Continued**  
**Boltless steel shelving: Data on industry in Taiwan, by period**

Shares and ratios in percent

Item	2020	2021	2022	Projection 2023	Projection 2024
Capacity utilization ratio	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***
Internal consumption share	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***
Home market shipments share	***	***	***	***	***
Exports to the United States share	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***
Export shipments share	***	***	***	***	***
Total shipments share	***	***	***	***	***

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

## Alternative products

As shown in table VII-16, responding firms in Taiwan produced other products on the same equipment and machinery used to produce boltless steel shelving. Production of boltless steel shelving increased \*\*\* percent from 2020-22, while production of other products, which includes \*\*\*, increased \*\*\* percent. The share of Shin Yeh's production devoted to boltless steel shelving was at least \*\*\* percent in all periods, but that share declined \*\*\* percentage points from 2020-22.

**Table VII-16**  
**Boltless steel shelving: Shin Yeh's overall production on the same equipment as subject production, by period**

Quantity in units; shares in percent

Product type	Measure	2020	2021	2022
Boltless steel shelving	Quantity	***	***	***
Other products	Quantity	***	***	***
All products	Quantity	***	***	***
Boltless steel shelving	Share	***	***	***
Other products	Share	***	***	***
All products	Share	***	***	***

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

## Exports

According to GTA, the leading export markets for metal furniture, other than for offices, which includes boltless steel shelving, from Taiwan are those in the United States, Japan, and Western Europe (table VII-17). During 2022, the United States was the top export market for metal furniture, other than for offices, accounting for 55.2 percent, followed by Japan, accounting for 17.9 percent. Together, these top two destination markets accounted for 73.1 percent of all worldwide destination markets for Taiwan in that year.

**Table VII-17**  
**Metal furniture, other than for offices: Exports from Taiwan, by period**

Value in 1,000 dollars; shares in percent

Destination market	Measure	2020	2021	2022
United States	Value	413,368	416,295	288,877
Japan	Value	114,545	132,784	93,686
Germany	Value	18,194	19,753	16,697
United Kingdom	Value	15,193	15,567	12,125
Australia	Value	14,232	12,104	11,246
Mexico	Value	3,909	9,809	7,847
Netherlands	Value	10,442	10,518	7,767
United Arab Emirates	Value	5,621	11,840	6,820
South Africa	Value	2,322	2,820	5,240
All other destination markets	Value	79,368	86,002	72,924
All destination markets	Value	677,193	717,490	523,231
United States	Share	61.0	58.0	55.2
Japan	Share	16.9	18.5	17.9
Germany	Share	2.7	2.8	3.2
United Kingdom	Share	2.2	2.2	2.3
Australia	Share	2.1	1.7	2.1
Mexico	Share	0.6	1.4	1.5
Netherlands	Share	1.5	1.5	1.5
United Arab Emirates	Share	0.8	1.7	1.3
South Africa	Share	0.3	0.4	1.0
All other destination markets	Share	11.7	12.0	13.9
All destination markets	Share	100.0	100.0	100.0

Source: Official export statistics under HS subheading 9403.20 as reported by the Taiwan Directorate General of Customs in the Global Trade Atlas database, accessed May 15, 2023.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top, all remaining top export destinations shown in descending order of 2022 data. At the six-digit level, the merchandise exports presented in this table cover more merchandise than just boltless steel shelving.

## The industry in Thailand

The Commission issued foreign producers' or exporters' questionnaires to four firms believed to produce and/or export boltless steel shelving from Thailand and for which contact information was obtainable.<sup>13</sup> Usable responses to the Commission's questionnaire were received from one firm, Fuding Industries Company Limited ("Fuding").<sup>14</sup> These firms' exports to the United States accounted for approximately \*\*\* percent of U.S. imports of boltless steel shelving from Thailand in 2022.<sup>15</sup> According to estimates requested of the responding producers in Thailand, the production of boltless steel shelving in Thailand reported in questionnaires accounts for approximately \*\*\* percent of overall production of boltless steel shelving in Thailand.<sup>16</sup> Table VII-18 presents information on the boltless steel shelving operations of the responding producers and exporters in Thailand.

**Table VII-18**  
**Boltless steel shelving: Summary data for producers in Thailand, 2022**

Firm	Production (units)	Share of reported production (percent)	Exports to the United States (units)	Share of reported exports to the United States (percent)	Total shipments (units)	Share of firm's total shipments exported to the United States (percent)
Fuding	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Table VII-19 presents events in Thailand's industry since January 1, 2020.

<sup>13</sup> These firms were identified through a review of information submitted in the petition.

<sup>14</sup> Another company, Siam Steel International Public Company Limited, \*\*\*.

<sup>15</sup> Based on a comparison of Fuding's reported exports to imports from Thailand reported in questionnaire data in 2022.

<sup>16</sup> The firm also estimated that it accounted for \*\*\* percent of total exports from Thailand to the U.S. in 2022. Staff believes these estimates are overstated, as importers of boltless steel shelving from Thailand identified other firms as the foreign producers of their merchandise from Thailand, including \*\*\*.

**Table VII-19****Boltless steel shelving: Important industry events in Thailand since January 1, 2020**

Item	Firm	Event
New producer	Fuding	April 2021— Fuding, established production operations in the Nikhom Phatthana District, Rayong Province, near major airports and deep seaports, principally to manufacture prepackaged steel shelving, for the U.S. retail market.

Source: Fuding, “Home” web page, no date, <https://www.fudingindustries.com/>, retrieved May 24, 2023; Funding, “Company Profile” web page, no date, <https://www.fudingindustries.com/about>, retrieved May 24, 2023; and

Fuding, “Contact” web page, no date, <https://www.fudingindustries.com/contact>, retrieved May 24, 2023; Petitioner’s postconference brief, exh. 9: Information on Subject Producers’ Capacity and Export Orientation.

## Changes in operations

Producers in Thailand were asked to report any change in the character of their operations or organization relating to the production of boltless steel shelving since 2020. Table VII-20 presents the changes identified by Fuding.

**Table VII-20****Boltless steel shelving: Reported changes in operations in Thailand since January 1, 2020, by firm**

Item	Firm name and accompanying narrative response
Plant openings	***
Weather-related or force majeure events	***

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

## Operations on boltless steel shelving

Table VII-21 presents data on Thailand producers’ installed capacity, practical overall capacity, and practical boltless steel shelving capacity and production on the same equipment. Fuding first reported production and capacity in 2022. The firm did not report producing any products on the same machinery other than boltless steel shelving.<sup>17</sup>

<sup>17</sup> When asked by staff to clarify if the production figures provided were actual data or estimates, the firm replied that “\*\*\*.” Additionally, when asked about its capacity utilization figures, the firm replied, “\*\*\*.” Email from \*\*\* to Commission staff, May 25, 2022.

**Table VII-21**

**Boltless steel shelving: Fuding's installed and practical capacity and production on the same equipment as subject production, by period**

Capacity and production in units; utilization in percent

Item	Measure	2020	2021	2022
Installed overall	Capacity	***	***	***
Installed overall	Production	***	***	***
Installed overall	Utilization	***	***	***
Practical overall	Capacity	***	***	***
Practical overall	Production	***	***	***
Practical overall	Utilization	***	***	***
Practical boltless steel shelving	Capacity	***	***	***
Practical boltless steel shelving	Production	***	***	***
Practical boltless steel shelving	Utilization	***	***	***

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

Table VII-22 presents Fuding's reported capacity constraints since January 1, 2020.

**Table VII-22**

**Boltless steel shelving: Fuding's reported capacity constraints since January 1, 2020**

Item	Firm name and narrative response on constraints to practical overall capacity
Storage capacity	***
Logistics/transportation	***
Other constraints	***

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

Table VII-23 presents information on the boltless steel shelving operations of the responding producers and exporters in Thailand. Fuding first reported production and capacity in 2022. It reported that \*\*\* percent of its shipments were exports to the United States. The firm explained the basis of its projections as being "\*\*\*." <sup>18</sup>

<sup>18</sup> Fuding's foreign producers' questionnaire response.

**Table VII-23****Boltless steel shelving: Data on industry in Thailand, by period**

Quantity in units

Item	2020	2021	2022	Projection 2023	Projection 2024
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Internal consumption	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Home market shipments	***	***	***	***	***
Exports to the United States	***	***	***	***	***
Exports to all other markets	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***

Table continued.

**Table VII-23 Continued****Boltless steel shelving: Data on industry in Thailand, by period**

Shares and ratios in percent

Item	2020	2021	2022	Projection 2023	Projection 2024
Capacity utilization ratio	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***
Internal consumption share	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***
Home market shipments share	***	***	***	***	***
Exports to the United States share	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***
Export shipments share	***	***	***	***	***
Total shipments share	***	***	***	***	***

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

**Alternative products**

As discussed above, the firm did not report producing any products on the same machinery other than boltless steel shelving.



## Exports

According to GTA, the leading export markets for metal furniture, other than for offices, which includes boltless steel shelving, from Thailand are those in the United States, Western Europe, Oceania, and Southeast Asia (table VII-24). During 2022, the United States was the top export market for metal furniture, other than for offices, accounting for 87.5 percent. Other leading destination markets each accounted for 1.3 percent or less of all worldwide destination markets for Thailand in that year.

**Table VII-24**  
**Metal furniture, other than for offices: Exports from Thailand, by period**

Value in 1,000 dollars; shares in percent

Destination market	Measure	2020	2021	2022
United States	Value	173,434	203,033	178,285
Belgium	Value	2,427	3,027	2,678
Australia	Value	1,819	2,225	2,234
Myanmar	Value	2,675	2,285	2,158
China	Value	967	1,614	2,075
Vietnam	Value	1,115	762	1,719
Germany	Value	2,261	1,736	1,707
Cambodia	Value	1,197	1,215	1,596
Taiwan	Value	122	404	1,416
All other destination markets	Value	20,112	13,080	9,880
All destination markets	Value	206,129	229,380	203,749
United States	Share	84.1	88.5	87.5
Belgium	Share	1.2	1.3	1.3
Australia	Share	0.9	1.0	1.1
Myanmar	Share	1.3	1.0	1.1
China	Share	0.5	0.7	1.0
Vietnam	Share	0.5	0.3	0.8
Germany	Share	1.1	0.8	0.8
Cambodia	Share	0.6	0.5	0.8
Taiwan	Share	0.1	0.2	0.7
All other destination markets	Share	9.8	5.7	4.8
All destination markets	Share	100.0	100.0	100.0

Source: Official export statistics under HS subheading 9403.20 as reported by the Thai Customs Department in the Global Trade Atlas database, accessed May 15, 2023.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top, all remaining top export destinations shown in descending order of 2022 data. At the six-digit level, the merchandise exports presented in this table cover more merchandise than just boltless steel shelving.

## The industry in Vietnam

The Commission issued foreign producers' or exporters' questionnaires to one firm believed to produce and/or export boltless steel shelving from Vietnam and for which contact information was obtainable.<sup>19</sup> Responses to the Commission's questionnaire were received from two firms: Quoc Ham Co., Ltd. ("Quoc Ham") and Cuong Nghia Import Export Trading Service Company Limited ("Cuong Nghia").<sup>20</sup> These firms' exports to the United States accounted for approximately \*\*\* percent of U.S. imports of boltless steel shelving from Vietnam in 2022.<sup>21</sup> According to estimates requested of the responding producers in Vietnam, the production of boltless steel shelving in Vietnam reported in questionnaires accounts for approximately \*\*\* percent of overall production of boltless steel shelving in Vietnam. Tables VII-25 presents information on the boltless steel shelving operations of the responding producers and exporters in Vietnam.

**Table VII-25**  
**Boltless steel shelving: Summary data for producers in Vietnam, 2022**

Firm	Production (units)	Share of reported production (percent)	Exports to the United States (units)	Share of reported exports to the United States (percent)	Total shipments (units)	Share of firm's total shipments exported to the United States (percent)
Quoc Ham	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

<sup>19</sup> These firms were identified through a review of information submitted in the petition.

<sup>20</sup> Cuong Nghia \*\*\*. Staff believes these \*\*\*, and so relevant tables in this Part concerning the industry in Vietnam only include exports reported by Quoc Ham.

<sup>21</sup> Based on a comparison of Quoc Ham's reported exports to imports from Vietnam reported in questionnaire data in 2022. According to the firms' estimates, they accounted for \*\*\* percent of total exports from Vietnam to the U.S. in 2022. Email from \*\*\* to Commission staff, June 1, 2023.

There were no major developments in Vietnam’s industry since January 1, 2020, identified by interested parties in the proceeding and no relevant information from outside sources was found.

## Changes in operations

Producers in Vietnam were asked to report any change in the character of their operations or organization relating to the production of boltless steel shelving since 2020. Table VII-26 presents the changes identified by producers in Vietnam.

**Table VII-26**

**Boltless steel shelving: Reported changes in operations in Vietnam since January 1, 2020, by firm**

Item	Firm name and accompanying narrative response
Prolonged shutdowns	***

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

## Operations on boltless steel shelving

Table VII-27 presents data on the installed capacity, practical overall capacity, and practical boltless steel shelving capacity and production on the same equipment reported by producers in Vietnam. Installed overall capacity maintained consistent levels from 2020-2022, while installed overall production decreased \*\*\* percent from 2020-22, resulting in a decrease in installed overall capacity utilization of \*\*\* percentage points from 2020-22. Practical boltless steel shelving capacity also operated at consistent levels from 2020-22, while production decreased \*\*\* percent, resulting in a decrease in boltless steel shelving capacity utilization of \*\*\* percentage points.<sup>22</sup>

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<sup>22</sup> Producers in Vietnam reported no production of products other than boltless steel shelving on the same machinery, and so practical overall and practical boltless steel shelving data are the same.

**Table VII-27**

**Boltless steel shelving: Vietnam producers' installed and practical capacity and production on the same equipment as subject production, by period**

Capacity and production in units; utilization in percent

Item	Measure	2020	2021	2022
Installed overall	Capacity	***	***	***
Installed overall	Production	***	***	***
Installed overall	Utilization	***	***	***
Practical overall	Capacity	***	***	***
Practical overall	Production	***	***	***
Practical overall	Utilization	***	***	***
Practical boltless steel shelving	Capacity	***	***	***
Practical boltless steel shelving	Production	***	***	***
Practical boltless steel shelving	Utilization	***	***	***

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

Table VII-28 presents Vietnam producers' reported capacity constraints since January 1, 2020.

**Table VII-28**

**Boltless steel shelving: Vietnam producers' reported capacity constraints since January 1, 2020**

Item	Firm name and narrative response on constraints to practical overall capacity
Other constraints	***

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

Table VII-29 presents information on the boltless steel shelving operations of the responding producers and exporters in Vietnam. As discussed previously, the capacity utilization for boltless steel shelving reported by producers in Vietnam decreased by \*\*\* percentage points from 2020-22 as production decreased while capacity remained constant. The \*\*\* of producers' shipments were exports to the United States in all periods. Quoc Ham explained its projections as follows: "\*\*\*."<sup>23</sup>

<sup>23</sup> Quoc Ham's foreign producers' questionnaire response. Additionally, while Cuong Nghia reported \*\*\*.

**Table VII-29**  
**Boltless steel shelving: Data on industry in Vietnam, by period**

Quantity in units

Item	2020	2021	2022	Projection 2023	Projection 2024
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Internal consumption	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Home market shipments	***	***	***	***	***
Exports to the United States	***	***	***	***	***
Exports to all other markets	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***

Table continued.

**Table VII-29 Continued**  
**Boltless steel shelving: Data on industry in Vietnam, by period**

Shares and ratios in percent

Item	2020	2021	2022	Projection 2023	Projection 2024
Capacity utilization ratio	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***
Internal consumption share	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***
Home market shipments share	***	***	***	***	***
Exports to the United States share	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***
Export shipments share	***	***	***	***	***
Total shipments share	***	***	***	***	***

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

## **Alternative products**

As discussed above, producers in Vietnam did not report producing any products on the same machinery other than boltless steel shelving.

## **Exports**

According to GTA, the leading export markets for metal furniture, other than for offices, which includes boltless steel shelving, from Vietnam are those in the United States, Japan, and Germany (table VII-30). During 2022, the United States was the top export market for metal furniture, other than for offices, accounting for 42.1 percent, followed by Japan and Germany, with each accounting for 2.5 percent apiece. Together, these top three destination markets accounted for 47.1 percent of all worldwide destination markets for Vietnam in that year.

**Table VII-30**  
**Metal furniture, other than for offices: Exports from Vietnam, by period**

Value in 1,000 dollars; shares in percent

Destination market	Measure	2020	2021	2022
United States	Value	533,096	744,092	854,462
Japan	Value	37,854	46,886	51,440
Germany	Value	25,872	40,230	50,207
France	Value	15,858	14,133	23,346
Canada	Value	16,303	27,610	22,471
Netherlands	Value	21,044	29,084	21,798
United Kingdom HMRC	Value	9,096	17,530	19,846
Sweden	Value	12,883	17,129	19,562
Poland	Value	7,905	13,169	14,719
All other destination markets	Value	605,511	845,805	951,606
All destination markets	Value	1,285,421	1,795,668	2,029,458
United States	Share	41.5	41.4	42.1
Belgium	Share	2.9	2.6	2.5
Australia	Share	2.0	2.2	2.5
Myanmar	Share	1.2	0.8	1.2
China	Share	1.3	1.5	1.1
Vietnam	Share	1.6	1.6	1.1
Germany	Share	0.7	1.0	1.0
Cambodia	Share	1.0	1.0	1.0
Taiwan	Share	0.6	0.7	0.7
All other destination markets	Share	47.1	47.1	46.9
All destination markets	Share	100.0	100.0	100.0

Source: Official imports statistics of imports from Vietnam (constructed export statistics for Vietnam) under HS subheading 9403.20 as reported by various statistical reporting authorities in the Global Trade Atlas database, accessed May 15, 2023.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top, all remaining top export destinations shown in descending order of 2022 data. At the six-digit level, the merchandise exports presented in this table cover more merchandise than just boltless steel shelving.

## Subject countries combined

Table VII-31 presents summary data on boltless steel shelving operations of the reporting subject producers in the subject countries.

**Table VII-31**

**Boltless steel shelving: Data on the industry in subject countries, by period**

Quantity in units

Item	2020	2021	2022	Projection 2023	Projection 2024
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Internal consumption	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Home market shipments	***	***	***	***	***
Exports to the United States	***	***	***	***	***
Exports to all other markets	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***

Table continued.



**Table VII-31 Continued**  
**Boltless steel shelving: Data on the industry in subject countries, by period**

Shares and ratios in percent

Item	2020	2021	2022	Projection 2023	Projection 2024
Capacity utilization ratio	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***
Internal consumption share	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***
Home market shipments share	***	***	***	***	***
Exports to the United States share	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***
Export shipments share	***	***	***	***	***
Total shipments share	***	***	***	***	***

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

Table VII-32 presents summary data on boltless steel shelving operations of the reporting subject producers in the subject countries except India.

**Table VII-32****Boltless steel shelving: Data on the industry in subject countries, less India, by period**

Quantity in units

Item	2020	2021	2022	Projection 2023	Projection 2024
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Internal consumption	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Home market shipments	***	***	***	***	***
Exports to the United States	***	***	***	***	***
Exports to all other markets	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***

Table continued.

**Table VII-32 Continued****Boltless steel shelving: Data on the industry in subject countries, less India, by period**

Shares and ratios in percent

Item	2020	2021	2022	Projection 2023	Projection 2024
Capacity utilization ratio	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***
Internal consumption share	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***
Home market shipments share	***	***	***	***	***
Exports to the United States share	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***
Export shipments share	***	***	***	***	***
Total shipments share	***	***	***	***	***

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. inventories of imported merchandise

Table VII-33 presents data on U.S. importers' reported inventories of boltless steel shelving. Inventories of imports from subject sources decreased irregularly from 2020-22, for a total decrease of \*\*\* percent.

**Table VII-33****Boltless steel shelving: U.S. importers' inventories and their ratio to select items, by source and period**

Quantity in units; ratios in percent

Measure	Source	2020	2021	2022
Inventories quantity	India	***	***	***
Ratio to imports	India	***	***	***
Ratio to U.S. shipments of imports	India	***	***	***
Ratio to total shipments of imports	India	***	***	***
Inventories quantity	Malaysia	***	***	***
Ratio to imports	Malaysia	***	***	***
Ratio to U.S. shipments of imports	Malaysia	***	***	***
Ratio to total shipments of imports	Malaysia	***	***	***
Inventories quantity	Taiwan	***	***	***
Ratio to imports	Taiwan	***	***	***
Ratio to U.S. shipments of imports	Taiwan	***	***	***
Ratio to total shipments of imports	Taiwan	***	***	***
Inventories quantity	Thailand	***	***	***
Ratio to imports	Thailand	***	***	***
Ratio to U.S. shipments of imports	Thailand	***	***	***
Ratio to total shipments of imports	Thailand	***	***	***
Inventories quantity	Vietnam	***	***	***
Ratio to imports	Vietnam	***	***	***
Ratio to U.S. shipments of imports	Vietnam	***	***	***
Ratio to total shipments of imports	Vietnam	***	***	***
Inventories quantity	Subject	***	***	***
Ratio to imports	Subject	***	***	***
Ratio to U.S. shipments of imports	Subject	***	***	***
Ratio to total shipments of imports	Subject	***	***	***
Inventories quantity	Subject less india	***	***	***
Ratio to imports	Subject less india	***	***	***
Ratio to U.S. shipments of imports	Subject less india	***	***	***
Ratio to total shipments of imports	Subject less india	***	***	***
Inventories quantity	Nonsubject	***	***	***
Ratio to imports	Nonsubject	***	***	***
Ratio to U.S. shipments of imports	Nonsubject	***	***	***
Ratio to total shipments of imports	Nonsubject	***	***	***
Inventories quantity	Nonsubject plus India	***	***	***
Ratio to imports	Nonsubject plus India	***	***	***
Ratio to U.S. shipments of imports	Nonsubject plus India	***	***	***
Ratio to total shipments of imports	Nonsubject plus India	***	***	***
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.

## U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of boltless steel shelving from the subject countries after December 31, 2022. Their reported data is presented in table VII-34.<sup>24</sup>

**Table VII-34**  
**Boltless steel shelving: U.S. importers' arranged imports, by source and period**

Quantity in units; shares in percent

Source	Measure	Jan-Mar 2023	Apr-Jun 2023	Jul-Sept 2023	Oct-Dec 2023	Total
India	Quantity	***	***	***	***	***
Malaysia	Quantity	***	***	***	***	***
Taiwan	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Subject sources less India	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
Nonsubject sources plus India	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
India	Share	***	***	***	***	***
Malaysia	Share	***	***	***	***	***
Taiwan	Share	***	***	***	***	***
Thailand	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Subject sources less India	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
Nonsubject sources plus India	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***

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

<sup>24</sup> \*\*\*. Email from \*\*\* to Commission staff, May 23, 2023.

## **Third-country trade actions**

Based on available information, boltless steel shelving from India, Malaysia, Taiwan, Thailand, or Vietnam has not been subject to other antidumping or countervailing duty investigations outside the United States.<sup>25</sup>

## **Information on nonsubject countries**

According to GTA, the leading nonsubject exporters of metal furniture, other than for offices, which includes boltless steel shelving, are China, certain Western European countries, and the United States (table VII-35). During 2022, China was the top exporter of metal furniture, other than for offices, accounting for 47.9 percent, followed by Germany, accounting for 6.7 percent, Italy, accounting for 3.4 percent, and the Netherlands, accounting for 3.3 percent. The United States accounted for 3.2 percent. Together, these top five exporters accounted for 64.4 percent of all worldwide exports of metal furniture, other than for offices, in that year.

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<sup>25</sup> Conference transcript, pp. 88 (Morey), pp. 120–121 (Nagarajan).

**Table VII-35****Metal furniture, other than for offices: Global exports by exporter and period**

Value in 1,000 dollars; shares in percent

Exporting country	Measure	2020	2021	2022
United States	Value	636,219	697,951	807,676
India	Value	153,481	281,487	299,905
Malaysia	Value	116,542	119,388	135,570
Taiwan	Value	677,193	717,490	523,231
Thailand	Value	206,129	229,380	203,749
Vietnam	Value	1,285,421	1,795,668	2,029,458
Subject exporters	Value	2,438,767	3,143,414	3,191,913
China	Value	10,060,165	12,231,932	11,997,065
Germany	Value	1,392,319	1,750,536	1,668,038
Italy	Value	607,284	798,406	845,596
Netherlands	Value	525,489	712,173	815,131
Canada	Value	404,015	474,756	633,223
Poland	Value	414,038	523,292	575,475
Mexico	Value	182,303	296,611	439,980
Spain	Value	260,640	378,473	409,707
All other exporters	Value	2,733,184	3,501,501	3,667,442
All reporting exporters	Value	19,654,423	24,509,043	25,051,246
United States	Share	3.2	2.8	3.2
India	Share	0.8	1.1	1.2
Malaysia	Share	0.6	0.5	0.5
Taiwan	Share	3.4	2.9	2.1
Thailand	Share	1.0	0.9	0.8
Vietnam	Share	6.5	7.3	8.1
Subject exporters	Share	12.4	12.8	12.7
China	Share	51.2	49.9	47.9
Germany	Share	7.1	7.1	6.7
Italy	Share	3.1	3.3	3.4
Netherlands	Share	2.7	2.9	3.3
Canada	Share	2.1	1.9	2.5
Poland	Share	2.1	2.1	2.3
Mexico	Share	0.9	1.2	1.8
Spain	Share	1.3	1.5	1.6
All other exporters	Share	13.9	14.3	14.6
All reporting exporters	Share	100.0	100.0	100.0

Source: Official export statistics under HS subheading 9403.20, as reported by national customs authorities in the Global Trade Atlas database, accessed May 15, 2023. Data for Vietnam represents official imports statistics of imports from Vietnam (constructed export statistics for Vietnam) under HS subheading 9403.20 as reported by various statistical reporting authorities in the Global Trade Atlas database.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top, followed by the countries under investigation, and all remaining top exporting countries in descending order of 2022 data. At the six-digit level, the merchandise exports presented in this table cover more merchandise than just boltless steel shelving.





**APPENDIX A**

**FEDERAL REGISTER NOTICES**



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

Citation	Title	Link
88 FR 27529, May 2, 2023	<i>Boltless Steel Shelving Units Prepackaged for Sale From India, Malaysia, Taiwan, Thailand, and Vietnam; Institution of Anti-Dumping Duty Investigations and Scheduling of Preliminary Phase Investigations</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2023-05-02/pdf/2023-09278.pdf">https://www.govinfo.gov/content/pkg/FR-2023-05-02/pdf/2023-09278.pdf</a>
88 FR 27923, May 3, 2023	<i>Boltless Steel Shelving Units Prepackaged for Sale From India, Malaysia, Taiwan, Thailand, and Vietnam; Revised Schedule for the Subject Investigations</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2023-05-03/pdf/2023-09394.pdf">https://www.govinfo.gov/content/pkg/FR-2023-05-03/pdf/2023-09394.pdf</a>
88 FR 32188, May 19, 2023	<i>Boltless Steel Shelving Units Prepackaged for Sale From India, Malaysia, Taiwan, Thailand and the Socialist Republic of Vietnam: Initiation of Less-Than-Fair-Value Investigations</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2023-05-19/pdf/2023-10778.pdf">https://www.govinfo.gov/content/pkg/FR-2023-05-19/pdf/2023-10778.pdf</a>



## **APPENDIX B**

### **LIST OF STAFF CONFERENCE WITNESSES**



## CALENDAR OF PUBLIC PRELIMINARY CONFERENCE

Those listed below appeared in the United States International Trade Commission's preliminary conference via videoconference:

**Subject:** Boltless Steel Shelving Units Prepackaged for Sale from India, Malaysia, Taiwan, Thailand, and Vietnam

**Inv. Nos.:** 731-TA-1607-1611 (Preliminary)

**Date and Time:** May 16, 2023 - 9:30 a.m.

### **OPENING REMARKS:**

In Support of Imposition (**Joshua R. Morey**, Kelley Drye & Warren LLP)  
In Opposition to Imposition (**Nithya Nagarajan**, Husch Blackwell, LLP)

### **In Support of the Imposition of the Antidumping Duty Orders:**

Kelley Drye & Warren LLP  
Washington, DC  
on behalf of

Edsal Manufacturing Co., Inc. ("Edsal")

**Scott White**, President, and Chief Executive Officer, Edsal

**Chris Kruger**, Vice President of Sales, and Marketing, Edsal

**Gina E. Beck**, Senior Trade Analyst, Georgetown Economic Services, LLC

**William B. Hudgens**, Senior Trade Analyst, Georgetown Economic Services, LLC

**Jacob Jones**, Trade Analyst, Georgetown Economic Services, LLC

**Kathleen W. Cannon** )  
**Joshua R. Morey** ) – OF COUNSEL  
**Elizabeth C. Johnson** )

**In Opposition to the Imposition of the  
Antidumping Duty Orders:**

Husch Blackwell, LLP  
Washington, DC  
on behalf of

Triune Technofab Private Limited

**Arun Miranda**, Managing Director, Triune Technofab Private Limited

<b>Nithya Nagarajan</b>	)
<b>Jeffrey S. Neeley</b>	) – OF COUNSEL
<b>Stephen W. Brophy</b>	)

**REBUTTAL/CLOSING REMARKS:**

In Support of Imposition (**Kathleen W. Cannon**, Kelley Drye & Warren LLP)  
In Opposition to Imposition (**Jeffrey S. Neeley**, Husch Blackwell, LLP)

**-END-**



**APPENDIX C**  
**SUMMARY DATA**



Table C-1

**Boltless steel shelving: Summary data concerning the U.S. market, by item and period**

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

Item	Reported data			Period changes		
	2020	2021	2022	2020-22	2020-21	2021-22
U.S. consumption quantity:						
Amount.....	***	***	***	▼***	▼***	▼***
Producers' share (fn1).....	***	***	***	▼***	▼***	▼***
Importers' share (fn1):						
India.....	***	***	***	▲***	***	▲***
Malaysia.....	***	***	***	▲***	▲***	▲***
Taiwan.....	***	***	***	▲***	▲***	▲***
Thailand.....	***	***	***	▲***	▼***	▲***
Vietnam.....	***	***	***	▼***	▲***	▼***
Subject sources.....	***	***	***	▲***	▲***	▲***
Subject sources less India.....	***	***	***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	▲***	▲***	▲***
Nonsubject sources plus India.....	***	***	***	▲***	▲***	▲***
All import sources.....	***	***	***	▲***	▲***	▲***
U.S. consumption value:						
Amount.....	***	***	***	▲***	▲***	▼***
Producers' share (fn1).....	***	***	***	▼***	▼***	▼***
Importers' share (fn1):						
India.....	***	***	***	▲***	***	▲***
Malaysia.....	***	***	***	▲***	▲***	▲***
Taiwan.....	***	***	***	▲***	▲***	▲***
Thailand.....	***	***	***	▲***	▼***	▲***
Vietnam.....	***	***	***	▼***	▼***	▼***
Subject sources.....	***	***	***	▲***	▲***	▲***
Subject sources less India.....	***	***	***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	▲***	▲***	▲***
Nonsubject sources plus India.....	***	***	***	▲***	▲***	▲***
All import sources.....	***	***	***	▲***	▲***	▲***
U.S. importers' U.S. shipments of imports from:						
India:						
Quantity.....	***	***	***	▲***	***	▲***
Value.....	***	***	***	▲***	***	▲***
Unit value.....	***	***	***	▲***	***	▲***
Ending inventory quantity.....	***	***	***	***	***	***
Malaysia:						
Quantity.....	***	***	***	▲***	▲***	▲***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▲***	▼***	▲***
Ending inventory quantity.....	***	***	***	▲***	▼***	▲***
Taiwan:						
Quantity.....	***	***	***	▼***	▲***	▼***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	***
Thailand:						
Quantity.....	***	***	***	▼***	▼***	▲***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	▼***	▼***	▼***

Table continued.

Table C-1 Continued

**Boltless steel shelving: Summary data concerning the U.S. market, by item and period**

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

Item	Reported data			Period changes		
	2020	2021	2022	2020-22	2020-21	2021-22
U.S. importers' U.S. shipments of imports from: Continued						
Vietnam:						
Quantity.....	***	***	***	▼***	▲***	▼***
Value.....	***	***	***	▼***	▼***	▼***
Unit value.....	***	***	***	▲***	▼***	▲***
Ending inventory quantity.....	***	***	***	▲***	▼***	▲***
Subject sources:						
Quantity.....	1,628,878	1,996,209	1,958,196	▲20.2	▲22.6	▼(1.9)
Value.....	131,342	159,106	182,719	▲39.1	▲21.1	▲14.8
Unit value.....	\$81	\$80	\$93	▲15.7	▼(1.2)	▲17.1
Ending inventory quantity.....	***	***	***	▼***	▼***	▲***
Subject sources less India:						
Quantity.....	***	***	***	▲***	▲***	▼***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▲***	▼***	▲***
Ending inventory quantity.....	***	***	***	▼***	▼***	▲***
Nonsubject sources:						
Quantity.....	***	***	***	▲***	▲***	▼***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
Nonsubject sources plus India:						
Quantity.....	***	***	***	▲***	▲***	▲***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
All import sources:						
Quantity.....	***	***	***	▲***	▲***	▼***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▲***	▼***	▲***
Ending inventory quantity.....	***	***	***	▼***	▼***	▲***
U.S. producers':						
Practical capacity quantity.....	***	***	***	▼***	▼***	▼***
Production quantity.....	***	***	***	▼***	▼***	▼***
Capacity utilization (fn1).....	***	***	***	▼***	▼***	▼***
U.S. shipments:						
Quantity.....	***	***	***	▼***	▼***	▼***
Value.....	***	***	***	▲***	▲***	▼***
Unit value.....	***	***	***	▲***	▲***	▲***
Export shipments:						
Quantity.....	***	***	***	▼***	▼***	▼***
Value.....	***	***	***	▼***	▼***	▼***
Unit value.....	***	***	***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	▼***	▼***	▲***
Inventories/total shipments (fn1).....	***	***	***	▲***	▼***	▲***
Production workers.....	***	***	***	▼***	▼***	▼***
Hours worked (1,000s).....	***	***	***	▼***	▼***	▼***
Wages paid (\$1,000).....	***	***	***	▼***	▼***	▼***
Hourly wages (dollars per hour).....	***	***	***	▲***	▲***	▲***
Productivity (units per hour).....	***	***	***	▼***	▲***	▼***
Unit labor costs.....	***	***	***	▲***	▲***	▲***

Table continued.

**Table C-1 Continued**

**Boltless steel shelving: Summary data concerning the U.S. market, by item and period**

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

Item	Reported data			Period changes		
	2020	2021	2022	2020-22	2020-21	2021-22
U.S. producers': Continued						
Net sales:						
Quantity.....	***	***	***	▼***	▼***	▼***
Value.....	***	***	***	▲***	▲***	▼***
Unit value.....	***	***	***	▲***	▲***	▲***
Cost of goods sold (COGS).....	***	***	***	▲***	▲***	▼***
Gross profit or (loss) (fn2).....	***	***	***	▼***	▼***	▲***
SG&A expenses.....	***	***	***	▲***	▼***	▲***
Operating income or (loss) (fn2).....	***	***	***	▼***	▼***	▲***
Net income or (loss) (fn2).....	***	***	***	▼***	▼***	▲***
Unit COGS.....	***	***	***	▲***	▲***	▲***
Unit SG&A expenses.....	***	***	***	▲***	▲***	▲***
Unit operating income or (loss) (fn2).....	***	***	***	▲***	▼***	▲***
Unit net income or (loss) (fn2).....	***	***	***	▼***	▼***	▲***
COGS/sales (fn1).....	***	***	***	▲***	▲***	▼***
Operating income or (loss)/sales (fn1).....	***	***	***	▼***	▼***	▲***
Net income or (loss)/sales (fn1).....	***	***	***	▼***	▼***	▲***
Capital expenditures.....	***	***	***	▲***	▼***	▲***
Research and development expenses.....	***	***	***	▲***	▲***	▲***
Net assets.....	***	***	***	▼***	▼***	▼***

Source: Compiled from data submitted in response to Commission questionnaires. 508-compliant tables containing these data are contained in parts III, IV, VI, and VII of this report.

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

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

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



## **APPENDIX D**

### **ALTERNATIVE NEGLIGENCE TABLES FOR PART IV**





The below tables present information on imports in the twelve month period preceding the filing of the petition (table D-1), and in a series of 12-month periods leading up to and including the actual 12-month period preceding the filing of the petition (Table D-2), but adjusted to exclude all imports from Canada, China, Mexico, and South Korea, as well as confirmed out-of-scope imports from India reported by U.S. importer \*\*\*.

**Table D-1**

**Boltless steel shelving: U.S. imports in the twelve month period preceding the filing of the petition, April 2022 through March 2023**

Quantity in units; Share of quantity in percent

Source of imports	Quantity: Adjusted official statistics	Share of quantity: Adjusted official statistics	Quantity: Questionnaire data as shown in part IV	Share of quantity: Questionnaire data as shown in part IV	Quantity: Largest reported data for source between questionnaire data and adjusted official import statistics in this table	Share of quantity: Largest reported data for source
India	***	***	***	***	***	***
Malaysia	561,920	***	***	***	***	***
Taiwan	677,309	***	***	***	***	***
Thailand	676,718	***	***	***	***	***
Vietnam	416,218	***	***	***	***	***
All other sources	177,478	***	***	***	***	***
All import sources	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 9403.20.0075, accessed May 10, 2023. Imports are based on the imports for consumption data series. Official U.S. import statistics were adjusted to remove all imports from Canada, China, Mexico, and South Korea, as well as confirmed out-of-scope imports from India reported by U.S. importer \*\*\* under the above referenced statistical reporting number.

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

**Table D-2**

**Boltless steel shelving: U.S. imports based on quantity in a series of 12-month periods leading up to and including the actual 12-month period preceding the filing of the petition, by source and the ending month of the 12-month aggregation**

Quantity in units; Share of quantity in percent

Twelve month period ending	Quantity: India	Quantity: All import sources	Share: India	Share: All import sources
January 2022	***	***	***	***
February 2022	***	***	***	***
March 2022	***	***	***	***
April 2022	***	***	***	***
May 2022	***	***	***	***
June 2022	***	***	***	***
July 2022	***	***	***	***
August 2022	***	***	***	***
September 2022	***	***	***	***
October 2022	***	***	***	***
November 2022	***	***	***	***
December 2022	***	***	***	***
January 2023	***	***	***	***
February 2023	***	***	***	***
March 2023	***	***	***	***

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 9403.20.0075, accessed May 10, 2023. Imports are based on the imports for consumption data series. Official U.S. import statistics were adjusted to remove all imports from Canada, China, Mexico, and South Korea, as well as confirmed out-of-scope imports from India reported by U.S. importer \*\*\* under the above referenced statistical reporting number.

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

**Figure D-1**

**Boltless steel shelving: India's share of overall U.S. imports based on quantity in a series of 12-month periods leading up to and including the actual 12-month period preceding the filing of the petition, by the ending month of the 12-month aggregation**

\* \* \* \* \*

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 9403.20.0075, accessed May 10, 2023. Imports are based on the imports for consumption data series. Official U.S. import statistics were adjusted to remove all imports from Canada, China, Mexico, and South Korea, as well as confirmed out-of-scope imports from India reported by U.S. importer \*\*\* under the above referenced statistical reporting number.

