

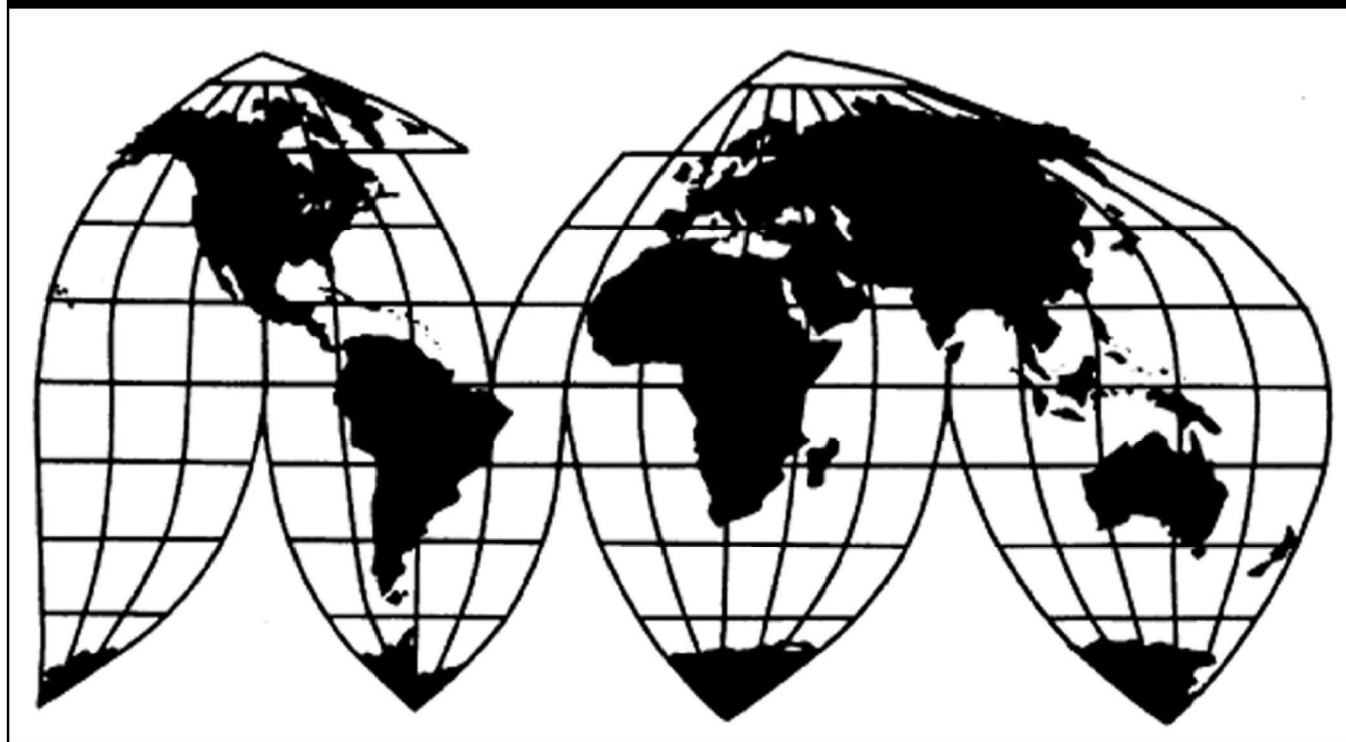
Certain Freight Rail Couplers from Mexico and Parts Thereof

Investigation No. 731-TA-1593 (Final)

Publication 5470

November 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Note.—Information that would reveal confidential operations of individual concerns may not be published.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 (including by brackets or by parallel lines) in confidential reports and is deleted and replaced with asterisks in public reports.

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation No. 731-TA-1593 (Final)

Certain Freight Rail Couplers and Parts Thereof from Mexico

DETERMINATION

On the basis of the record¹ developed in the subject investigation, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that an industry in the United States is materially injured by reason of imports of certain freight rail couplers and parts thereof from Mexico, provided for in subheadings 8607.30.10 and 7326.90.86 of the Harmonized Tariff Schedule of the United States, that have been found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”).^{2 3}

BACKGROUND

The Commission instituted investigations effective September 28, 2022, following receipt of petitions filed with the Commission and Commerce by the Coalition of Freight Coupler Producers, consisting of McConway & Torley LLC, Pittsburgh, Pennsylvania, and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO, CLC. The final phase of the investigations was scheduled by the Commission following notification of preliminary determinations by Commerce that imports of FRCs from China were subsidized within the meaning of section 703(b) of the Act (19 U.S.C. 1671b(b)) and sold at LTFV within the meaning of 733(b) of the Act (19 U.S.C. 1673b(b)). Notice of the scheduling of the final phase of the Commission’s investigations and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* on March 15, 2023 (88 FR 16031). The Commission

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

² 88 FR 65153 (September 21, 2023).

³ Chairman David S. Johanson dissenting.

conducted its hearing on May 18, 2023. All persons who requested the opportunity were permitted to participate.

The investigation schedules became staggered when Commerce did not align its antidumping and countervailing duty investigations for China with its antidumping duty investigation for Mexico, and reached earlier final antidumping and countervailing duty determinations for China. On July 3, 2023, the Commission issued final affirmative determinations in its antidumping and countervailing duty investigations of certain freight rail couplers and parts thereof from China (88 FR 43398, July 7, 2023). Following notification of a final determination by Commerce that imports of certain freight rail couplers and parts thereof from Mexico were being sold at LTFV within the meaning of section 735(a) of the Act (19 U.S.C. 1673d(a)), notice of the supplemental scheduling of the final phase of the Commission's antidumping duty investigation was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* of October 2, 2023 (88 FR 67812).

Views of the Commission

Based on the record in the final phase of this investigation, we determine that an industry in the United States is materially injured by reason of imports of certain freight rail couplers and parts thereof (“FRCs”) from Mexico found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”).¹

I. Background

The petitions in the antidumping duty investigations of imports of FRCs from China and Mexico and the countervailing duty investigation of imports of FRCs from China were filed on September 28, 2022, by the Coalition of Freight Coupler Producers (“Petitioner”), consisting of McConway and Torley, LLC, a U.S. producer of FRCs, and the United Steel, Paper, and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO, CLC, a union representing workers at domestic FRC production facilities.² The investigation schedules became staggered when Commerce did not postpone its final determinations for the antidumping and countervailing duty investigations regarding FRCs from China,³ while it did postpone its final determination for the antidumping duty investigation regarding FRCs from Mexico.⁴ This necessitated an earlier determination by the Commission in the antidumping and countervailing duty investigations of FRCs from China (the “leading investigations”), and the Commission reached affirmative determinations in those investigations on June 7, 2023.⁵

¹ Chairman David S. Johanson, adopting the findings and analyses from his dissenting views in *Certain Freight Rail Couplers and Parts Thereof from China*, determines that an industry in the United States is not materially injured or threatened with material injury by reason of subject imports of FRCs from Mexico. See Dissenting Views of Chairman David S. Johanson, EDIS Doc. 799942 (July 3, 2023); see also *infra* note 16 (taking into account Commerce’s final dumping margins with respect to Mexico).

² Supplemental Confidential Report (“Supplemental CR”), INV-VV-086 (Oct. 16, 2023); *Certain Freight Rail Couplers and Parts Thereof from Mexico*, Inv. No. 731-TA-1593 (Final), USITC Pub. 5470 (Nov. 2023) (“Supplemental PR”) at I-1.

³ *Certain Freight Rail Couplers and Parts Thereof from the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination and Preliminary Affirmative Critical Circumstances Determination*, 88 Fed. Reg. 13,425 (Mar. 3, 2023); *Certain Freight Rail Couplers and Parts Thereof from the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value and Preliminary Affirmative Determination of Critical Circumstances*, 88 Fed. Reg. 15,372 (Mar. 13, 2023).

⁴ *Certain Freight Rail Couplers and Parts Thereof from Mexico: Preliminary Affirmative Determination of Sales at Less Than Fair Value Preliminary Negative Determination of Critical Circumstances, Postponement of Final Determination, and Extension of Provisional Measures*, 88 Fed. Reg. 27,864 (May 3, 2023).

⁵ *Certain Freight Rail Couplers and Parts Thereof from China*, 88 Fed. Reg. 43,398 (June 7, 2023); *Certain Freight Rail Couplers and Parts Thereof from China*, Inv. Nos. 701-TA-682 and 731-TA-1592 (Continued...)

Subsequently, Commerce published its final affirmative antidumping duty determination with respect to imports of FRCs from Mexico.⁶ As a result, the Commission must now make its determination in the antidumping duty investigation of FRCs from Mexico (the “trailing investigation”).⁷ Pursuant to the statutory provision on staggered investigations, 19 U.S.C. § 1677(7)(G)(iii), the record for the trailing investigation closed on June 8, 2023, at the same time as the record for the leading investigations, except that Commerce’s final affirmative determination regarding imports from Mexico, and the parties’ supplemental final comments concerning that determination, have been added to the record.⁸

Petitioner filed supplemental final comments with respect to the antidumping duty investigation of FRCs from Mexico.⁹ Respondent Amsted Rail Company, Inc., a U.S. producer and importer of FRCs from Mexico, and ASF-K de Mexico S. de R.L. de C.V., a producer and exporter of FRCs from Mexico, (collectively “Amsted”) also filed supplemental final comments.¹⁰

II. Negligible Imports

Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product that account for less than 3 percent of all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition shall generally be deemed negligible.¹¹ Neither Petitioner nor Amsted addressed negligibility in their supplemental final comments.

(Final), USITC Pub. 5438 (July 2023). The Commission cumulatively assessed subject imports from China and Mexico for purposes of its material injury analysis in the leading investigations. *See id.* at 27.

⁶ *Certain Freight Rail Couplers and Parts Thereof from Mexico: Final Affirmative Determination of Sales at Less Than Fair Value and Final Negative Determination of Critical Circumstances*, 88 Fed. Reg. 65,153 (Sept. 21, 2023).

⁷ *See Certain Freight Rail Couplers and Parts Thereof from Mexico; Supplemental Schedule for the Final Phase of Antidumping Duty Investigation*, 88 Fed. Reg. 67,812 (Oct. 2, 2023).

⁸ *See* 19 U.S.C. § 1677(7)(G)(iii).

⁹ Petitioner’s Supplemental Final Comments, EDIS Doc. 805341 (Oct. 4, 2023).

¹⁰ Amsted’s Supplemental Final Comments, EDIS Doc. 805354 (Oct. 4, 2023). In its scheduling notice for this investigation, the Commission stated that “[s]upplemental party comments may address only Commerce’s final antidumping duty determination regarding imports of FRCs from Mexico.” *Certain Freight Rail Couplers and Parts Thereof from Mexico; Supplemental Schedule for the Final Phase of Antidumping Duty Investigation*, 88 Fed. Reg. 67,812, 67,813 (Oct. 2, 2023). Contrary to these instructions, Amsted’s supplemental final comments make arguments that do not clearly relate to Commerce’s final antidumping duty determination regarding imports of FRCs from Mexico. *See generally* Amsted’s Supplemental Final Comments, EDIS Doc. 805354 (Oct. 4, 2023); *see also* Petitioner’s Request to Reject Amsted’s Supplemental Party Comments, EDIS Doc. 805457 (Oct. 5, 2023). Consequently, we have disregarded Amsted’s supplemental final comments.

¹¹ 19 U.S.C. § 1677(24)(A)(i).

During the 12-month period prior to the filing of the petitions (September 2021 through August 2022), imports of FRCs from Mexico subject to the antidumping duty investigation accounted for *** percent *** of total imports.¹² Because subject imports from Mexico exceeded the 3 percent negligibility threshold, we find that imports of FRCs from Mexico subject to the antidumping duty investigation are not negligible.

III. Material Injury by Reason of Cumulated Subject Imports

Section 771(7)(G)(iii) of the Tariff Act of 1930, as amended (“the Act”), provides that the Commission must make its material injury determinations in the instant trailing investigation on the basis of the same record as that in the leading investigations, except to the extent discussed above.¹³ Therefore, in this investigation, we adopt the findings and analyses from our determinations and views in the leading investigations with respect to the issues of domestic

¹² Supplemental CR/PR at Table I-3.

¹³ 19 U.S.C. § 1677(7)(G)(iii).

like product, domestic industry, cumulation, conditions of competition, and material injury by reason of cumulated subject imports.^{14 15 16}

IV. Conclusion

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of subject imports of FRCs from Mexico found by Commerce to be sold in the United States at LTFV.

¹⁴ *Certain Freight Rail Couplers and Parts Thereof from China*, USITC Pub. 5438. Commissioner Amy A. Karpel does not join the Commission's majority finding with respect to the definition of the domestic industry, and instead adopts her separate views along with Chairman Johanson on the issue in the leading determinations. See Separate Views of Chairman David S. Johanson and Commissioner Amy A. Karpel on Related Parties, EDIS Doc. 799943 (July 3, 2023). Commissioner Karpel also adopts her separate material injury findings on the price effects of subject imports and subject imports' impact on the domestic industry (as defined by herself and Chairman Johanson), as detailed in *Certain Freight Rail Couplers and Parts Thereof from China*. See *Certain Freight Rail Couplers and Parts Thereof from China*, USITC Pub. 5438 at nn. 227, 234, 243, 254, 255, 259, 277, 281, 284, 292, and 322.

¹⁵ The statute additionally instructs the Commission to consider the "magnitude of the dumping margin" in an antidumping duty proceeding as part of its consideration of the impact of subject imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final antidumping duty determination regarding imports of FRCs Mexico, Commerce found a 48.10 percent antidumping duty margin for ASF-K de Mexico S. de R.L. de C.V. and for all other Mexican producers and exporters. *Certain Freight Rail Couplers and Parts Thereof from Mexico: Final Affirmative Determination of Sales at Less Than Fair Value and Final Negative Determination of Critical Circumstances*, 88 Fed. Reg. 65,153, 65,154 (Sept. 21, 2023).

We take into account in our analysis the fact that Commerce has made a final finding that subject imports from Mexico are sold in the United States at LTFV, including the magnitude of the margins of dumping found by Commerce. In addition to this consideration, other factors that support our analysis from the *Certain Freight Rail Couplers and Parts Thereof from China* leading determinations remain unchanged and do not require modification; for example, our analysis of the significant price effects of cumulated subject imports found in the leading determinations is probative to our assessment of the impact of such imports, including subject imports from Mexico. See *Certain Freight Rail Couplers and Parts Thereof from China*, USITC Pub. 5438 at 39-46.

Commissioner Karpel has also taken the magnitude of Commerce's final dumping margins for subject imports from Mexico into account in her analysis, and does not require modification of her analysis in the leading determinations.

¹⁶ Chairman Johanson has taken into consideration Commerce's final dumping margins for subject imports from Mexico (88 Fed. Reg. at 65,154) and finds that they do not require modification of his analysis in the leading determinations. See also *Certain Freight Rail Couplers and Parts Thereof from China*, USITC Pub. 5438 at 74-75 n.69.

Part I: Introduction

Background

These investigations result from petitions filed on September 28, 2022, with the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (“USITC” or “Commission”) by Coalition of Freight Coupler Producers, consisting of McConway & Torley LLC (“M&T”), Pittsburgh, Pennsylvania, and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO, CLC. (“USW”), 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 certain freight rail couplers and parts thereof (“FRC(s)”) ¹ from China and Mexico, and subsidized imports from China. Table I-1 presents information relating to the background of these investigations. ^{2 3}

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

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

³ Appendix B presents a list of witnesses who appeared at the Commission’s hearing.

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

Effective date	Action
September 28, 2022	Petitions filed with Commerce and the Commission; institution of Commission investigations (87 FR 60413, October 5, 2022)
October 18, 2022	Commerce's notices of initiation (87 FR 64440 and 87 FR 64444, October 25, 2022)
November 14, 2022	Commission's preliminary determinations (87 FR 63940, November 18, 2022)
March 3, 2023	Commerce's preliminary China CVD determination (88 FR 13425, March 3, 2023); scheduling of final phase of Commission investigations (88 FR 16031, March 15, 2023)
March 13, 2023	Commerce's preliminary China AD determination (88 FR 15372, March 13, 2023)
May 3, 2023	Commerce's preliminary Mexico AD determination (88 FR 27864, May 3, 2023)
May 18, 2023	Commission's hearing
May 19, 2023	Commerce's final CVD determination with respect to imports from China (88 FR 32184, May 19, 2023)
May 30, 2023	Commerce's final AD determination with respect to imports from China (88 FR 34485, May 30, 2023)
June 14, 2023	Commission's vote
July 3, 2023	Commission's views and determinations (on leading investigations) (88 FR 43398, July 7, 2023)
July 14, 2023	Commerce's orders for leading investigations (China CVD) (88 FR 45135); (China AD) (88 FR 45138)
September 21, 2023	Commerce's final determination (trailing investigation, Mexico AD) (88 FR 65153)
September 26, 2023	Scheduling of final phase of Commission's trailing investigation (Mexico AD) (88 FR 67812, October 2, 2023)
October 24, 2023	Commission's vote (trailing investigation)
November 6, 2023	Commission's views (trailing investigation)

The information contained in this report is intended to be used in conjunction with data presented in the Commission's report on *Certain Freight Rail Couplers and Parts Thereof from China*, Investigation Nos. 701-TA-682 and 731-TA-1592 (Final), USITC Publication 5438, July 2023, and its corresponding confidential report contained in memorandum No. INV-VV-048, *Certain Freight Rail Couplers and Parts Thereof from China*, Investigation Nos. 701-TA-682 and

731-TA-1592 (Final).⁴ No new information except for Commerce’s final LTFV determination concerning FRCs from Mexico, and party comments thereon is included in the record for this proceeding.⁵

Nature and extent of sales at LTFV

On September 21, 2023, Commerce published a notice in the Federal Register of its final determination of sales at LTFV with respect to imports from Mexico.⁶ Table I-2 presents Commerce’s dumping margins with respect to imports of FRCs from Mexico.

Table I-2
FRCs: Commerce’s final weighted-average LTFV margins with respect to imports from Mexico

Producer/Exporter	Final dumping margin (percent)
ASF-K de Mexico S. de R.L. de C.V.	48.10
All others	48.10

Source: 88 FR 65153, September 21, 2023.

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.⁷ Negligible imports are generally defined in the Act, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.⁸ Imports from Mexico accounted

⁴ Appendix C of this report reproduces summary data referenced in the Commission’s views.

⁵ Comments were filed on behalf of the Coalition of Freight Rail Coupler Producers (“Petitioners”); and Amsted Rail Company, Inc., and ASF-K de Mexico S. de R.L. de C.V. (“Respondents”).

⁶ 88 FR 65153, September 21, 2023.

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

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

for *** percent of total imports of FRCs by quantity during September 2021 through August 2022.

Table I-3

FRCs: U.S. imports in the twelve-month period preceding the filing of the petition, September 2021 through August 2022

Quantity in 1,000 pounds; share of quantity in percent

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

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

Note: These calculations are based on Commerce's final AD determination for FRCs from Mexico (88 FR 65153, September 21, 2023), and are unchanged from the calculations in the leading investigations.

Note: Share of quantity is the share of total imports by quantity.

APPENDIX A

FEDERAL REGISTER NOTICES

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

Citation	Title	Link
87 FR 60413, October 5, 2022	<i>Certain Freight Rail Couplers and Parts Thereof From China and Mexico; Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2022-10-05/pdf/2022-21576.pdf
87 FR 64440, October 25, 2022	<i>Certain Freight Rail Couplers and Parts Thereof From the People's Republic of China: Initiation of Countervailing Duty Investigation</i>	https://www.govinfo.gov/content/pkg/FR-2022-10-25/pdf/2022-23135.pdf
87 FR 64447, October 25, 2022	<i>Certain Freight Rail Couplers and Parts Thereof From the People's Republic of China and Mexico: Initiation of Less-Than-Fair-Value Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2022-10-25/pdf/2022-23136.pdf
87 FR 63940, November 18, 2022	<i>Certain Freight Rail Couplers and Parts Thereof From China and Mexico</i>	https://www.govinfo.gov/content/pkg/FR-2022-11-18/pdf/2022-25178.pdf
88 FR 13425, March 3, 2023	<i>Certain Freight Rail Couplers and Parts Thereof From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination and Preliminary Affirmative Critical Circumstances Determination</i>	https://www.govinfo.gov/content/pkg/FR-2023-03-03/pdf/2023-04438.pdf
88 FR 15372, March 13, 2023	<i>Certain Freight Rail Couplers and Parts Thereof From the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value and Preliminary Affirmative Determination of Critical Circumstances</i>	https://www.govinfo.gov/content/pkg/FR-2023-03-13/pdf/2023-05106.pdf

Citation	Title	Link
88 FR 16031, March 15, 2023	<i>Certain Freight Rail Couplers and Parts Thereof From China and Mexico: Scheduling of the Final Phase of Countervailing Duty and Anti-Dumping Duty Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2023-03-15/pdf/2023-05243.pdf
88 FR 27864, May 3, 2023	<i>Certain Freight Rail Couplers and Parts Thereof from Mexico: Preliminary Affirmative Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2023-05-03/pdf/2023-09350.pdf
88 FR 32184, May 19, 2023	<i>Certain Freight Rail Couplers and Parts Thereof From the People's Republic of China: Final Affirmative Countervailing Duty Determination and Final Affirmative Critical Circumstances Determination, In Part</i>	https://www.govinfo.gov/content/pkg/FR-2023-05-19/pdf/2023-10779.pdf
88 FR 34485, May 30, 2023	<i>Certain Freight Rail Couplers and Parts Thereof From the People's Republic of China: Final Affirmative Determination of Sales at Less-Than-Fair Value and Final Affirmative Determination of Critical Circumstances</i>	https://www.govinfo.gov/content/pkg/FR-2023-05-30/pdf/2023-11358.pdf
88 FR 43398, July 7, 2023	<i>Certain Freight Rail Couplers and Parts Thereof from China: Determinations</i>	https://www.govinfo.gov/content/pkg/FR-2023-07-07/pdf/2023-14410.pdf
88 FR 45135, July 14, 2023	<i>Certain Freight Rail Couplers and Parts Thereof From the People's Republic of China: Countervailing Duty Order</i>	https://www.govinfo.gov/content/pkg/FR-2023-07-14/pdf/2023-14891.pdf
88 FR 45138, July 14, 2023	<i>Certain Freight Rail Couplers and Parts Thereof From China: Antidumping Duty Order</i>	https://www.govinfo.gov/content/pkg/FR-2023-07-14/pdf/2023-14892.pdf
88 FR 65153, September 21, 2023	<i>Certain Freight Rail Couplers and Parts Thereof From Mexico: Final Affirmative Determination of Sales at LTFV and Final Negative Determination of Critical Circumstances</i>	https://www.govinfo.gov/content/pkg/FR-2023-09-21/pdf/2023-20483.pdf

Citation	Title	Link
88 FR 67812, October 2, 2023	<i>Certain Freight Rail Couplers and Parts Thereof From Mexico; Supplemental Schedule for the Final Phase of Antidumping Duty Investigation</i>	https://www.govinfo.gov/content/pkg/FR-2023-10-02/pdf/2023-21573.pdf

APPENDIX B

LIST OF HEARING WITNESSES

CALENDAR OF PUBLIC HEARING

Those listed below appeared in the United States International Trade Commission's hearing:

Subject: Freight Rail Couplers and Parts Thereof from China and Mexico

Inv. Nos.: 701-TA-682 and 731-TA-1592-1593 (Final)

Date and Time: May 18, 2023 - 9:45 a.m.

Sessions were held in connection with these investigations in the Main Hearing Room (Room 101), 500 E Street, SW., Washington, DC.

OPENING REMARKS:

In Support of Imposition (**Daniel B. Pickard**, Buchanan Ingersoll & Rooney PC)
In Opposition to Imposition (**Douglas J. Heffner**, Faegre Drinker Biddle & Reath LLP)

In Support of Imposition of Antidumping and Countervailing Duty Orders:

Buchanan Ingersoll & Rooney PC
Washington, DC
on behalf of

Coalition of Freight Coupler Producers

Scott Mautino, Executive Vice President, McConway & Torley, LLC

Chris LeFevre, Director of Sales, McConway & Torley, LLC

Roxanne Brown, International Vice President at Large, United Steel,
Paper and Forestry, Rubber, Manufacturing, Energy,
Allied Industrial and Service Workers International Union

Dr. Seth T. Kaplan, Economist, International Economic Research

Travis Pope, Project Manager, Capital Trade, Inc.

Daniel B. Pickard)
Amanda L. Wetzel) – OF COUNSEL
Claire M. Webster)

**In Opposition to Imposition of
Antidumping and Countervailing Duty Orders:**

Faegre Drinker Biddle & Reath LLP
Washington, DC
on behalf of

Amsted Rail Company, Inc.
ASF-K de Mexico S. de R.L. de C.V.

Robert Oesch, Vice President Global Marketing & Customer Service,
Amsted Rail Company, Inc.

Jack Cumming, Vice President – Finance, Amsted Rail Company, Inc.

Jim Dougan, Partner, ION Economics, LLC

Cara Groden, Senior Economic Consultant, ION Economics, LLC

Douglas J. Heffner)
Richard P. Ferrin) – OF COUNSEL
Carrie Bethea Connolly)

Jones Day
Washington, DC
on behalf of

Wabtec Corporation

Mickey Korzeniowski, former Vice President, Wabtec’s Components Group

David M. Morrell)
Ryan Proctor) – OF COUNSEL
Shelbie Rose)

Grunfeld, Desiderio, Lebowitz, Silverman & Klestadt LLP
Washington, DC
on behalf of

Strato Inc. (“Strato”)

Brian Cunkelman, President, Strato Inc.

In Opposition to Imposition of
Antidumping and Countervailing Duty Orders (continued):

Dan Foxx, CIO, Strato Inc.

Ned H. Marshak)
) – OF COUNSEL
Andrew T. Schutz)

Covington & Burling LLP
Washington, DC
on behalf of

TTX Company (“TTX”)

Maureen Werner, Assistant Vice President,
Engineering and Research, TTX

James M. Smith) – OF COUNSEL

REBUTTAL/CLOSING REMARKS:

In Support of Imposition (**Daniel B. Pickard**, Buchanan Ingersoll & Rooney PC)
In Opposition to Imposition (**James M. Smith**, Covington & Burling LLP)

-END-

APPENDIX C
SUMMARY DATA

Table C-1: FRCs: Summary data concerning the U.S. market	C-3
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Co-extensive: All producers

Table C-1

FRCs: Summary data concerning the U.S. market, by item and period

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

Item	Reported data			Period changes		
	Calendar year			Comparison years		
	2020	2021	2022	2020-22	2020-21	2021-22
U.S. consumption quantity:						
Amount.....	***	***	***	▲ ***	▼ ***	▲ ***
Producers' share (fn1).....	***	***	***	▲ ***	▼ ***	▲ ***
Importers' share (fn1):						
China.....	***	***	***	▼ ***	▲ ***	▼ ***
Mexico.....	***	***	***	▲ ***	▲ ***	▼ ***
Subject sources.....	***	***	***	▼ ***	▲ ***	▼ ***
Nonsubject sources.....	***	***	***	***	***	***
All import sources.....	***	***	***	▼ ***	▲ ***	▼ ***
U.S. consumption value:						
Amount.....	***	***	***	▲ ***	▼ ***	▲ ***
Producers' share (fn1).....	***	***	***	▲ ***	▼ ***	▲ ***
Importers' share (fn1):						
China.....	***	***	***	▼ ***	▲ ***	▼ ***
Mexico.....	***	***	***	▼ ***	▲ ***	▼ ***
Subject sources.....	***	***	***	▼ ***	▲ ***	▼ ***
Nonsubject sources.....	***	***	***	***	***	***
All import sources.....	***	***	***	▼ ***	▲ ***	▼ ***
U.S. importers' U.S. shipments of imports from:						
China:						
Quantity.....	***	***	***	▼ ***	▼ ***	▼ ***
Value.....	***	***	***	▼ ***	▲ ***	▼ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▲ ***
Ending inventory quantity.....	***	***	***	▼ ***	▲ ***	▼ ***
Mexico:						
Quantity.....	***	***	***	▲ ***	▼ ***	▲ ***
Value.....	***	***	***	▲ ***	▲ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▲ ***
Ending inventory quantity.....	***	***	***	▲ ***	▼ ***	▲ ***
Subject sources:						
Quantity.....	***	***	***	▼ ***	▼ ***	▼ ***
Value.....	***	***	***	▲ ***	▲ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▲ ***
Ending inventory quantity.....	***	***	***	▼ ***	▲ ***	▼ ***
Nonsubject sources:						
Quantity.....	***	***	***	***	***	***
Value.....	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***
All import sources:						
Quantity.....	***	***	***	▼ ***	▼ ***	▼ ***
Value.....	***	***	***	▲ ***	▲ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▲ ***
Ending inventory quantity.....	***	***	***	▼ ***	▲ ***	▼ ***

Table continued.

Table C-1 Continued

FRCs: Summary data concerning the U.S. market, by item and period

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

Item	Reported data			Period changes		
	Calendar year			Comparison years		
	2020	2021	2022	2020-22	2020-21	2021-22
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 (pounds per hour).....	***	***	***	▼ ***	▼ ***	▲ ***
Unit labor costs.....	***	***	***	▲ ***	▲ ***	▼ ***
Net sales:						
Quantity.....	***	***	***	▲ ***	▼ ***	▲ ***
Value.....	***	***	***	▲ ***	▼ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▲ ***
Cost of goods sold (COGS).....	***	***	***	▲ ***	▼ ***	▲ ***
Gross profit or (loss) (fn2).....	***	***	***	▲ ***	▼ ***	▲ ***
SG&A expenses.....	***	***	***	▲ ***	▲ ***	▲ ***
Operating income or (loss) (fn2).....	***	***	***	▲ ***	▼ ***	▲ ***
Net income or (loss) (fn2).....	***	***	***	▲ ***	▲ ***	▲ ***
Unit COGS.....	***	***	***	▲ ***	▲ ***	▲ ***
Unit SG&A expenses.....	***	***	***	▲ ***	▲ ***	▼ ***
Unit operating income or (loss) (fn2).....	***	***	***	▲ ***	▼ ***	▲ ***
Unit net income or (loss) (fn2).....	***	***	***	▲ ***	▼ ***	▲ ***
COGS/sales (fn1).....	***	***	***	▼ ***	▲ ***	▼ ***
Operating income or (loss)/sales (fn1).....	***	***	***	▲ ***	▼ ***	▲ ***
Net income or (loss)/sales (fn1).....	***	***	***	▲ ***	▼ ***	▲ ***
Capital expenditures.....	***	***	***	▼ ***	▼ ***	▲ ***
Research and development expenses.....	***	***	***	▲ ***	▼ ***	▲ ***
Net assets.....	***	***	***	▼ ***	▼ ***	▼ ***

Source: Compiled from data submitted in response to Commission questionnaires. 508-compliant tables containing these data are contained in parts III, IV, VI, and VII of this report.

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

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

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

Co-extensive: Related party exclusion

Table C-2

FRCs: Summary data concerning the U.S. market excluding one U.S. producer *, by item and period**

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

Item	Reported data Calendar year			Period changes Comparison years		
	2020	2021	2022	2020-22	2020-21	2021-22
U.S. consumption quantity:						
Amount.....	***	***	***	▲ ***	▼ ***	▲ ***
Producers' share (fn1):						
Included producers.....	***	***	***	▲ ***	▲ ***	▲ ***
Excluded producers.....	***	***	***	▼ ***	▼ ***	▲ ***
All producers.....	***	***	***	▲ ***	▼ ***	▲ ***
Importers' share (fn1):						
China.....	***	***	***	▼ ***	▲ ***	▼ ***
Mexico.....	***	***	***	▲ ***	▲ ***	▼ ***
Subject sources.....	***	***	***	▼ ***	▲ ***	▼ ***
Nonsubject sources.....	***	***	***	***	***	***
All import sources.....	***	***	***	▼ ***	▲ ***	▼ ***
U.S. consumption value:						
Amount.....	***	***	***	▲ ***	▼ ***	▲ ***
Producers' share (fn1):						
Included producers.....	***	***	***	▲ ***	▲ ***	▲ ***
Excluded producers.....	***	***	***	▼ ***	▼ ***	▲ ***
All producers.....	***	***	***	▲ ***	▼ ***	▲ ***
Importers' share (fn1):						
China.....	***	***	***	▼ ***	▲ ***	▼ ***
Mexico.....	***	***	***	▼ ***	▲ ***	▼ ***
Subject sources.....	***	***	***	▼ ***	▲ ***	▼ ***
Nonsubject sources.....	***	***	***	***	***	***
All import sources.....	***	***	***	▼ ***	▲ ***	▼ ***
U.S. importers' U.S. shipments of imports from:						
China:						
Quantity.....	***	***	***	▼ ***	▼ ***	▼ ***
Value.....	***	***	***	▼ ***	▲ ***	▼ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▲ ***
Ending inventory quantity.....	***	***	***	▼ ***	▲ ***	▼ ***
Mexico:						
Quantity.....	***	***	***	▲ ***	▼ ***	▲ ***
Value.....	***	***	***	▲ ***	▲ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▲ ***
Ending inventory quantity.....	***	***	***	▲ ***	▼ ***	▲ ***
Subject sources:						
Quantity.....	***	***	***	▼ ***	▼ ***	▼ ***
Value.....	***	***	***	▲ ***	▲ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▲ ***
Ending inventory quantity.....	***	***	***	▼ ***	▲ ***	▼ ***
Nonsubject sources:						
Quantity.....	***	***	***	***	***	***
Value.....	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***

Table continued.

Table C-2 Continued

FRCs: Summary data concerning the U.S. market excluding one U.S. producer *, by item and period**

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

Item	Reported data			Period changes		
	2020	2021	2022	Comparison years		
				2020-22	2020-21	2021-22
U.S. importers' U.S. shipments of imports from: Continued						
All import sources:						
Quantity.....	***	***	***	▼***	▼***	▼***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	▼***	▲***	▼***
Included 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 (pounds per hour).....	***	***	***	▼***	▼***	▲***
Unit labor costs.....	***	***	***	▲***	▲***	▲***

Table continued.

Table C-2 Continued

FRCs: Summary data concerning the U.S. market excluding one U.S. producer *, by item and period**

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

Item	Reported data			Period changes		
	2020	2021	2022	Comparison years		
				2020-22	2020-21	2021-22
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 IV, V, Appendix H and M 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.

Expanded like product: All producers

Table C-3

FRCs and out-of-scope (OOS) components: Summary data concerning the U.S. market, by item and period

Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per 1,000 pounds; 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):						
FRCs: China.....	***	***	***	▼ ***	▲ ***	▼ ***
FRCs: Mexico.....	***	***	***	▲ ***	▲ ***	▼ ***
FRCs: Subject sources.....	***	***	***	▼ ***	▲ ***	▼ ***
FRCs: Nonsubject sources.....	***	***	***	***	***	***
FRCs: All import sources.....	***	***	***	▼ ***	▲ ***	▼ ***
OOS components: All import sources.....	***	***	***	▼ ***	▼ ***	▼ ***
Combined: All import sources.....	***	***	***	▼ ***	▲ ***	▼ ***
U.S. consumption value:						
Amount.....	***	***	***	▲ ***	▼ ***	▲ ***
Producers' share (fn1).....	***	***	***	▲ ***	▼ ***	▲ ***
Importers' share (fn1):						
FRCs: China.....	***	***	***	▼ ***	▲ ***	▼ ***
FRCs: Mexico.....	***	***	***	▲ ***	▲ ***	▼ ***
FRCs: Subject sources.....	***	***	***	▼ ***	▲ ***	▼ ***
FRCs: Nonsubject sources.....	***	***	***	***	***	***
FRCs: All import sources.....	***	***	***	▼ ***	▲ ***	▼ ***
OOS components: All import sources.....	***	***	***	▼ ***	▼ ***	▼ ***
Combined: All import sources.....	***	***	***	▼ ***	▲ ***	▼ ***
U.S. importers' U.S. shipments of imports from:						
FRCs: China:						
Quantity.....	***	***	***	▼ ***	▼ ***	▼ ***
Value.....	***	***	***	▼ ***	▲ ***	▼ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▲ ***
Ending inventory quantity.....	***	***	***	▼ ***	▲ ***	▼ ***
FRCs: Mexico:						
Quantity.....	***	***	***	▲ ***	▼ ***	▲ ***
Value.....	***	***	***	▲ ***	▲ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▲ ***
Ending inventory quantity.....	***	***	***	▲ ***	▼ ***	▲ ***
FRCs: Subject sources:						
Quantity.....	***	***	***	▼ ***	▼ ***	▼ ***
Value.....	***	***	***	▲ ***	▲ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▲ ***
Ending inventory quantity.....	***	***	***	▼ ***	▲ ***	▼ ***
FRCs: Nonsubject sources:						
Quantity.....	***	***	***	***	***	***
Value.....	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***

Table continued.

Table C-3 Continued

FRCs and out-of-scope (OOS) components: Summary data concerning the U.S. market, by item and period

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

Item	Reported data			Period changes		
	Calendar year			Comparison years		
	2020	2021	2022	2020-22	2020-21	2021-22
FRCs: All import sources:						
Quantity.....	***	***	***	▼***	▼***	▼***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	▼***	▲***	▼***
U.S. importers' U.S. shipments of imports from: Continued						
OOS components: All import sources:						
Quantity.....	***	***	***	▼***	▼***	▼***
Value.....	***	***	***	▼***	▼***	▼***
Unit value.....	***	***	***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
Combined (FRCs and OOS components):						
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 (pounds per hour).....	***	***	***	▲***	▲***	▲***
Unit labor costs.....	***	***	***	▲***	▲***	▲***

Table continued.

Table C-3 Continued

FRCs and out-of-scope (OOS) components: Summary data concerning the U.S. market, by item and period

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

Item	Reported data			Period changes		
	Calendar year			Comparison years		
	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 Appendix J and N 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.

Expanded like product: Related party exclusion

Table C-4

FRCs and OOS components: Summary data concerning the U.S. market excluding one U.S. producer *, by item and period**
 Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per 1,000 pounds; 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):						
Included producers.....	***	***	***	▲ ***	▲ ***	▲ ***
Excluded producers.....	***	***	***	▼ ***	▼ ***	▲ ***
All producers.....	***	***	***	▲ ***	▼ ***	▲ ***
Importers' share (fn1):						
FRCs: China.....	***	***	***	▼ ***	▲ ***	▼ ***
FRCs: Mexico.....	***	***	***	▲ ***	▲ ***	▼ ***
FRCs: Subject sources.....	***	***	***	▼ ***	▲ ***	▼ ***
FRCs: Nonsubject sources.....	***	***	***	***	***	***
FRCs: All import sources.....	***	***	***	▼ ***	▲ ***	▼ ***
OOS components: All import sources.....	***	***	***	▼ ***	▼ ***	▼ ***
Combined: All import sources.....	***	***	***	▼ ***	▲ ***	▼ ***
U.S. consumption value:						
Amount.....	***	***	***	▲ ***	▼ ***	▲ ***
Producers' share (fn1):						
Included producers.....	***	***	***	▲ ***	▲ ***	▲ ***
Excluded producers.....	***	***	***	▼ ***	▼ ***	▲ ***
All producers.....	***	***	***	▲ ***	▼ ***	▲ ***
Importers' share (fn1):						
FRCs: China.....	***	***	***	▼ ***	▲ ***	▼ ***
FRCs: Mexico.....	***	***	***	▲ ***	▲ ***	▼ ***
FRCs: Subject sources.....	***	***	***	▼ ***	▲ ***	▼ ***
FRCs: Nonsubject sources.....	***	***	***	***	***	***
FRCs: All import sources.....	***	***	***	▼ ***	▲ ***	▼ ***
OOS components: All import sources.....	***	***	***	▼ ***	▼ ***	▼ ***
Combined: All import sources.....	***	***	***	▼ ***	▲ ***	▼ ***
U.S. importers' U.S. shipments of imports from:						
FRCs: China:						
Quantity.....	***	***	***	▼ ***	▼ ***	▼ ***
Value.....	***	***	***	▼ ***	▲ ***	▼ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▲ ***
Ending inventory quantity.....	***	***	***	▼ ***	▲ ***	▼ ***
FRCs: Mexico:						
Quantity.....	***	***	***	▲ ***	▼ ***	▲ ***
Value.....	***	***	***	▲ ***	▲ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▲ ***
Ending inventory quantity.....	***	***	***	▲ ***	▼ ***	▲ ***
FRCs: Subject sources:						
Quantity.....	***	***	***	▼ ***	▼ ***	▼ ***
Value.....	***	***	***	▲ ***	▲ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▲ ***	▲ ***
Ending inventory quantity.....	***	***	***	▼ ***	▲ ***	▼ ***

Table continued.

Table C-4 Continued

FRCs and OOS components: Summary data concerning the U.S. market excluding one U.S. producer *, by item and period**

Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per 1,000 pounds; 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						
FRCs: Nonsubject sources:						
Quantity.....	***	***	***	***	***	***
Value.....	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***
FRCs: All import sources:						
Quantity.....	***	***	***	▼***	▼***	▼***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	▼***	▲***	▼***
OOS components: All import sources:						
Quantity.....	***	***	***	▼***	▼***	▼***
Value.....	***	***	***	▼***	▼***	▼***
Unit value.....	***	***	***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
Combined (FRCs and OOS components): All import sources						
Quantity.....	***	***	***	▼***	▼***	▼***
Value.....	***	***	***	▲***	▲***	▲***
Unit value.....	***	***	***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
Included 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 (pounds per hour).....	***	***	***	▲***	▲***	▲***
Unit labor costs.....	***	***	***	▲***	▲***	▲***

Table continued.

Table C-4 Continued

FRCs and OOS components: Summary data concerning the U.S. market excluding one U.S. producer *, by item and period**

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

Item	Reported data			Period changes		
	Calendar year			Comparison years		
	2020	2021	2022	2020-22	2020-21	2021-22
Included U.S. producers: Continued						
Net sales:						
Quantity.....	***	***	***	▲ ***	▼ ***	▲ ***
Value.....	***	***	***	▲ ***	▼ ***	▲ ***
Unit value.....	***	***	***	▲ ***	▼ ***	▲ ***
Cost of goods sold (COGS).....	***	***	***	▲ ***	▼ ***	▲ ***
Gross profit or (loss) (fn2).....	***	***	***	▲ ***	▼ ***	▲ ***
SG&A expenses.....	***	***	***	▲ ***	▲ ***	▲ ***
Operating income or (loss) (fn2).....	***	***	***	▲ ***	▼ ***	▲ ***
Net income or (loss) (fn2).....	***	***	***	▲ ***	▲ ***	▲ ***
Unit COGS.....	***	***	***	▼ ***	▼ ***	▼ ***
Unit SG&A expenses.....	***	***	***	▲ ***	▲ ***	▼ ***
Unit operating income or (loss) (fn2).....	***	***	***	▲ ***	▼ ***	▲ ***
Unit net income or (loss) (fn2).....	***	***	***	▲ ***	▼ ***	▲ ***
COGS/sales (fn1).....	***	***	***	▼ ***	▲ ***	▼ ***
Operating income or (loss)/sales (fn1).....	***	***	***	▲ ***	▼ ***	▲ ***
Net income or (loss)/sales (fn1).....	***	***	***	▲ ***	▼ ***	▲ ***
Capital expenditures.....	***	***	***	▼ ***	▼ ***	▲ ***
Research and development expenses.....	***	***	***	▼ ***	▼ ***	▲ ***
Net assets.....	***	***	***	▼ ***	▼ ***	▲ ***

Source: Compiled from data submitted in response to Commission questionnaires. Appendices J and N includes 508 compliant tables

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.

