

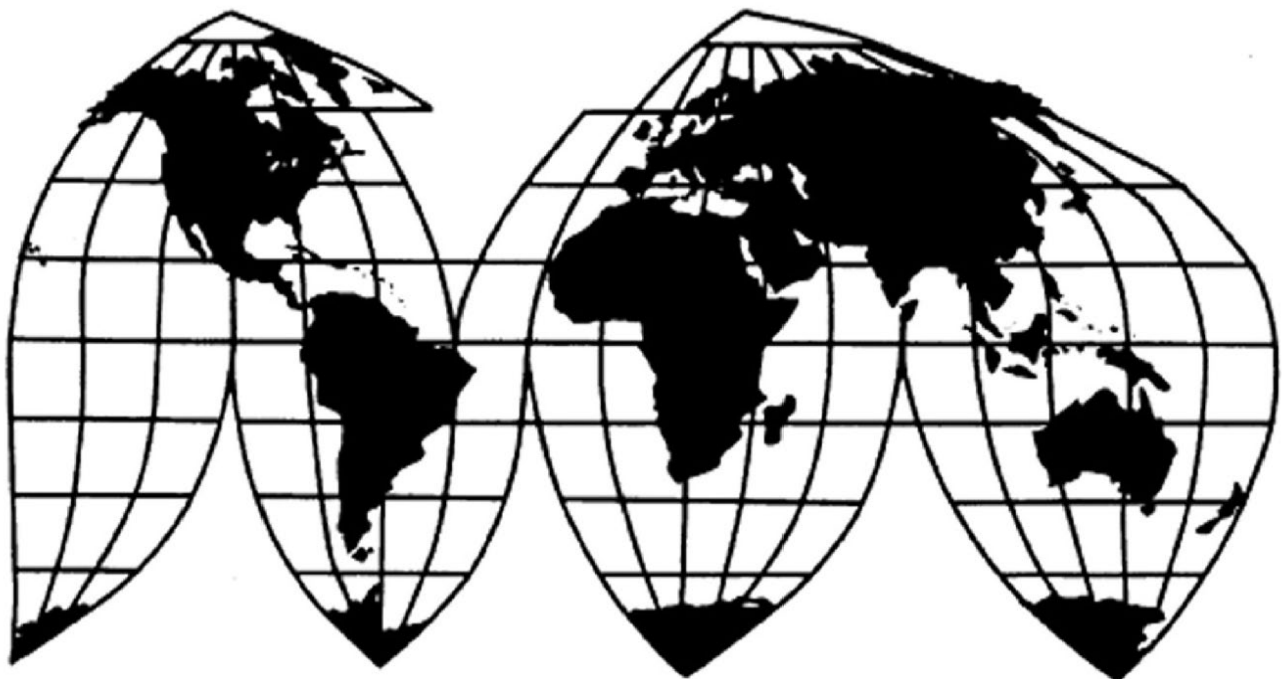
Boltless Steel Shelving Units Prepackaged For Sale from Malaysia, Taiwan, Thailand, and Vietnam

Investigation Nos. 731-TA-1608-1611 (Final)

Publication 5508

June 2024

U.S. International Trade Commission



U.S. International Trade Commission

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UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 731-TA-1608-1611 (Final)

Boltless steel shelving units prepackaged for sale from Malaysia, Taiwan, Thailand, and Vietnam

DETERMINATIONS

On the basis of the record¹ developed in the subject investigations, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that 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, provided for in subheading 9403.20.00 of the Harmonized Tariff Schedule of the United States, that have been found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”).²

BACKGROUND

The Commission instituted these investigations effective April 25, 2023, following receipt of petitions filed with the Commission and Commerce by Edsal Manufacturing Co., Inc., Chicago, Illinois. The Commission scheduled the final phase of the investigations following notification of preliminary determinations by Commerce that imports of boltless steel shelving from Malaysia, Taiwan, Thailand, and Vietnam were being sold at LTFV within the meaning of § 733(b) of the Act (19 U.S.C. 1673b(b)).³ 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* (88 FR 85914, December 11, 2023). The Commission conducted its hearing on April 11, 2024. All persons who requested the opportunity were permitted to participate.

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

² 89 FR 28736, 89 FR 28738, 89 FR 28741, 89 FR 28743, April 19, 2024.

³ On April 19, 2024, Commerce published notice in the Federal Register of a negative final determination in connection with its investigation concerning boltless steel shelving from India (89 FR 28746, April 19, 2024). Accordingly, effective April 19, 2024, the Commission terminated its antidumping duty investigation concerning boltless steel shelving from India (89 FR 33395, April 29, 2024).

Views of the Commission

Based on the record in the final phase of these investigations, we determine that an industry in the United States is materially injured by reason of imports of boltless steel shelving prepackaged for sale (“BSS” or “boltless steel shelving”) from Malaysia, Taiwan, Thailand, and Vietnam found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value.

I. Background

Edsal Manufacturing Co., Inc. (“Petitioner” or “Edsal”), a domestic producer of BSS, filed the petitions in these investigations on April 25, 2023.¹ Edsal submitted prehearing and posthearing briefs, and final comments, and representatives of Edsal submitted testimony and appeared at the hearing accompanied by counsel. No respondent parties actively participated in the final phase of these investigations.²

U.S. industry data are based on the questionnaire responses of two firms that accounted for all U.S. production of BSS during 2022.³ Except as noted, U.S. import data are based on the questionnaire responses of 12 U.S. importers of BSS that accounted for an estimated *** percent of BSS from all subject sources and *** percent of BSS imports from nonsubject sources.⁴ The Commission received questionnaire responses of one producer/exporter in Thailand, accounting for an estimated *** percent of U.S. imports of BSS from Thailand in 2022; and two producer/exporters in Vietnam, accounting for an estimated

¹ Edsal also filed a petition alleging injury by reason of less than fair value (“LTFV”) imports of BSS from India. Commerce determined that BSS from India are not being, or are not likely to be, sold in the United States at LTFV. *Boltless Steel Shelving Units Prepackaged for Sale From India: Final Negative Determination of Sales at Less Than Fair Value*, 89 Fed. Reg. 28746 (Apr. 19, 2024). Accordingly, the Commission terminated its investigation with respect to India. *Boltless Steel Shelving Units Prepackaged for Sale From India; Termination of Investigation*, 89 Fed. Reg. 33395 (Apr. 29, 2024).

² In the preliminary phase of the investigations, Triune Technofab Private Limited, a producer and exporter of subject merchandise in India, appeared at the conference and submitted a postconference brief on behalf of itself and JS Products, Inc. (“JS Products”), an importer of subject merchandise from India. In addition, Jaken Co. (“Jaken”), an importer of subject merchandise from Malaysia and Vietnam, filed a postconference statement.

³ Confidential Staff Report, INV-WW-035 (May 2, 2024) as revised by INV-WW-039 (May 6, 2024) (“CR”) at I-4; *Boltless Steel Shelving Units Prepackaged for Sale from Malaysia, Taiwan, Thailand, and Vietnam*, Inv. Nos. 731-TA-1608-1611 (Final), USITC Pub. 5508 (June 2024) (“PR”) at I-4.

⁴ CR/PR at I-4. Specifically, the questionnaire data is estimated to have accounted for *** of BSS from Malaysia, *** percent of BSS from Taiwan, *** percent BSS from Thailand, and *** percent of BSS from Vietnam in 2022. *Id.* In its final determination concerning BSS from Thailand, Commerce calculated a *de minimis* antidumping duty margin of 0.00 percent for imports from producer/exporter Siam Metal Tech Co., Ltd. *Boltless Steel Shelving Units Prepackaged for Sale From Thailand: Final Affirmative Determination of Sales at Less Than Fair Value*, 89 Fed. Reg. 28738 (Apr. 19, 2024). Accordingly, imports of BSS from this producer are considered nonsubject imports from Thailand for the purpose of these determinations. See CR/PR at I-4 n.6.

*** percent of U.S. imports of BSS from Vietnam in 2022.⁵ It received no questionnaire responses from any producer/exporters in Malaysia or Taiwan.⁶

II. Domestic Like Product

A. In General

In determining whether an industry in the United States is materially injured or threatened with material injury by reason of imports of subject merchandise, the Commission first defines the “domestic like product” and the “industry.”⁷ 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.”⁸ 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.”⁹

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.¹⁰ 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.”¹¹ The Commission then defines the domestic like product in light of the imported articles Commerce has identified.¹² 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

⁵ CR/PR at VII-3.

⁶ See CR/PR at Tables VII-2 and VII-9.

⁷ 19 U.S.C. § 1677(4)(A).

⁸ 19 U.S.C. § 1677(4)(A).

⁹ 19 U.S.C. § 1677(10).

¹⁰ 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).

¹¹ *Cleo Inc. v. United States*, 501 F.3d 1291, 1298 (Fed. Cir. 2007); see also *Hitachi Metals, Ltd. v. United States*, Case No. 19-1289, slip op. at 8-9 (Fed. Circ. Feb. 7, 2020) (the statute requires the Commission to start with Commerce’s subject merchandise in reaching its own like product determination).

¹² *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.¹³ No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.¹⁴ The Commission looks for clear dividing lines among possible like products and disregards minor variations.¹⁵

B. Product Description

Commerce has defined the imported merchandise within the scope of these investigations as follows:

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 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

¹³ See, *e.g.*, *Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Torrington Co. v. United States*, 747 F. Supp. 744, 749 n.3 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (“every like product determination ‘must be made on the particular record at issue’ and the ‘unique facts of each case’”). The Commission generally considers a number of factors, including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. See *Nippon*, 19 CIT at 455 n.4; *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996).

¹⁴ See, *e.g.*, S. Rep. No. 96-249 at 90-91 (1979).

¹⁵ *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.”).

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.¹⁶

The scope is unchanged from the preliminary phase of these investigations.¹⁷

BSS is relatively high load-capacity, stand-alone shelving that may be assembled with no or minimal tools. BSS provides a sturdy frame for functional, non-aesthetic storage in garages, basements, and similar locations. Since BSS is prepackaged, the end user may purchase the unit at home improvement stores or mass-merchandise retailers, and transport the unit to its ultimate location.¹⁸

BSS 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.¹⁹

Petitioner's Argument. Edsal argues that the Commission should define a single domestic like product coextensive with the scope of these investigations, as it did in the preliminary phase of the investigations.²⁰

Analysis. In its preliminary determinations, the Commission defined a single domestic like product consisting of all BSS, coextensive with Commerce's scope.²¹ The Commission found that all BSS products shared the same physical characteristics, end uses, and manufacturing facilities, processes, and employees, and were sold predominantly within the same channels of distribution. The record indicated that there were clear dividing lines between BSS and other types of shelving in terms of physical characteristics and end uses, with customers viewing BSS to be a distinct product not readily interchangeable with other types of shelving.²²

The record of these final phase investigations does not contain any new information or argument concerning the characteristics and uses of BSS that would warrant changing the Commission's definition of the domestic like product from the preliminary determinations.²³ Accordingly, we again define a single domestic like product consisting of BSS, coextensive with the scope.

¹⁶ *Boltless Steel Shelving Units Prepackaged for Sale From Malaysia: Final Affirmative Determination of Sales at Less Than Fair Value*, 89 Fed. Reg. 28736 (Apr. 19, 2024); *Boltless Steel Shelving Units Prepackaged for Sale From Taiwan: Final Affirmative Determination of Sales at Less Than Fair Value*, 89 Fed. Reg. 28741 (Apr. 19, 2024); *Boltless Steel Shelving Units Prepackaged for Sale From Thailand: Final Affirmative Determination of Sales at Less Than Fair Value*, 89 Fed. Reg. 28738 (Apr. 19, 2024); *Boltless Steel Shelving Units Prepackaged for Sale From the Socialist Republic of Vietnam: Final Affirmative Determination of Sales at Less-Than-Fair-Value*, 89 Fed. Reg. 28743 (Apr. 19, 2024).

¹⁷ *Boltless Steel Shelving Units Prepackaged for Sale from India, Malaysia, Taiwan, Thailand, and Vietnam*, Inv. Nos. 731-TA-1607-1611 (Preliminary), USITC Pub. 5434 (June 2023) ("Preliminary Determinations") at 6-8.

¹⁸ CR/PR at I-10.

¹⁹ CR/PR at I-14.

²⁰ Edsal's Prehearing Br. at 6-8.

²¹ Preliminary Determinations, USITC Pub. 5434 (June 2023) at 9-11.

²² Preliminary Determinations, USITC Pub. 5434 (June 2023) at 11.

²³ See generally CR/PR at I-9-15.

III. Domestic Industry

The domestic industry is defined as the domestic “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”²⁴ 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.

In these investigations, we must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.²⁵ Exclusion of such a producer is within the Commission’s discretion based upon the facts presented in each investigation.²⁶ In these investigations, petitioner Edsal is subject to possible exclusion from the definition of the domestic industry pursuant to the related party provision since it imported subject imports during the January 2020 to September 2023 period of investigation (“POI”).

Petitioner’s Argument. Edsal argues that appropriate circumstances do not exist to exclude it from the definition of the domestic industry under the related party provision.²⁷ It contends that the quantity of its imports of subject merchandise was small as a ratio of its domestic BSS production, which accounted for *** of all domestically produced BSS. This low ratio, Edsal claims, along with the fact that it is the petitioner in these investigations, demonstrates that its primary interest is in domestic production.²⁸ Accordingly, Edsal contends that the Commission should define the domestic industry as consisting of all U.S. producers of

²⁴ 19 U.S.C. § 1677(4)(A).

²⁵ 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).

²⁶ 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*, 879 F.3d 1377 (Fed. Cir. 2018); see also *Torrington Co. v. United States*, 790 F. Supp. at 1168.

²⁷ Edsal’s Prehearing Br. at 9.

²⁸ Edsal’s Prehearing Br. at 9.

the domestic like product.²⁹ We consider below whether appropriate circumstances exist to exclude Edsal from the domestic industry.

Analysis. Edsal is the petitioner and the largest U.S. producer of BSS, accounting for *** percent of domestic production in 2022.³⁰ During the POI Edsal imported subject merchandise from ***.³¹ Its subject imports declined from *** units in 2020 to *** units in 2021 and *** units in 2022; they were lower in January – September 2023 (“interim 2023”) at *** units than in January – September 2022 (“interim 2022”).³² The ratio of Edsal’s subject imports to its domestic production was *** percent in 2020, and *** percent in 2021 and 2022; it was *** percent in interim 2023 compared to *** percent in interim 2022.³³ Edsal states that it imported subject merchandise because ***.³⁴

In view of the facts that Edsal accounted for *** domestic production of BSS during the POI, with a *** low ratio of subject imports to domestic production throughout the period, Edsal’s primary interest appears to be in domestic production. The evidence also does not indicate that Edsal’s domestic operations benefited from its subject imports to an extent that its inclusion in the domestic industry would mask injury. Indeed, as Edsal accounted for nearly all domestic BSS production, excluding it from the domestic industry would result in a distorted view of the industry. We therefore 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 BSS.

IV. Cumulation³⁵

For purposes of evaluating the volume and effects for a determination 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

²⁹ Edsal’s Prehearing Br. at 10.

³⁰ CR/PR at Table III-1.

³¹ CR/PR at Table III-11.

³² CR/PR at Table III-11.

³³ CR/PR at Table III-11.

³⁴ CR/PR at Table III-12.

³⁵ 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. 19 U.S.C. §§ 1673d(b), 1677(24)(A)(i).

During the most recent 12-month period preceding the filing of the petitions in these investigations, April 2022 through March 2023, 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. Because the volume of subject imports from each subject country exceeds the three percent negligibility threshold, we find that imports of BSS from Malaysia, Taiwan, Thailand, and Vietnam subject to the antidumping duty investigations are not negligible.

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.³⁶

While no single factor is necessarily determinative, and the list of factors is not exclusive, these factors are intended to provide the Commission with a framework for determining whether the subject imports compete with each other and with the domestic like product.³⁷ Only a “reasonable overlap” of competition is required.³⁸

Petitioner’s Arguments. Edsal argues that the Commission should cumulatively assess imports from all subject sources because the petitions were filed on the same day, none of the statutory exceptions apply, and there is a reasonable overlap of competition.³⁹ Edsal contends that subject imports from all countries are fungible with each other and the domestic like product.⁴⁰ Edsal also submits 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 POI.⁴¹

³⁶ See *Certain Cast-Iron Pipe Fittings from Brazil, the Republic of Korea, and Taiwan*, Inv. Nos. 731-TA-278-280 (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).

³⁷ See, e.g., *Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int’l Trade 1989).

³⁸ 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, S.A. v. United States*, 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.”)).

³⁹ Edsal’s Prehearing Br. at 13-14.

⁴⁰ Edsal’s Prehearing Br. at 14.

⁴¹ Edsal’s Prehearing Br. 15.

Analysis. We consider subject imports from Malaysia, Taiwan, Thailand, and Vietnam on a cumulated basis because the statutory criteria for cumulation are satisfied. As an initial matter, petitioner filed the antidumping duty petitions with respect to all subject countries on the same day, April 25, 2023.⁴² The record also supports finding a reasonable overlap of competition between subject imports from all subject sources and between subject imports from each source and the domestic like product, for the reasons discussed below.

Fungibility. The record indicates that domestically produced BSS and imports of BSS from each subject source are generally fungible. All responding U.S. producers and U.S. importers, and most responding purchasers, reported that subject imports from each subject country were always or frequently interchangeable with each other and with domestically produced BSS.⁴³ In addition, when asked to compare subject imports with the domestic like product regarding 16 purchasing factors, most purchasers reported that U.S.-produced BSS was comparable to BSS from each subject country, with only a handful of exceptions.⁴⁴ The record also indicates that domestically produced BSS and imports from each subject source were sold in overlapping widths and load-bearing capacities.⁴⁵

Channels of Distribution. During the POI, domestically produced BSS and subject imports from each source were sold predominately to retailers, with the small remainder of domestically produced BSS sold to distributors and the small remainder of subject imports sold to end users and distributors.⁴⁶ U.S. producers and importers of BSS from Vietnam sold *** to retailers, while importers of subject BSS from Taiwan and Thailand sold *** to retailers.⁴⁷ Importers of BSS from Malaysia made *** of their U.S. shipments to retailers throughout the POI, with the remainder sold to end users, accounting for *** to *** percent of their U.S. shipments, and distributors, accounting for *** to *** percent of their U.S. shipments.⁴⁸

Geographic Overlap. Domestically produced BSS and imports from each subject source were sold in all geographic market areas of the United States.⁴⁹ In addition, subject imports from Taiwan, Thailand, and Vietnam entered the United States through all borders of entry in

⁴² CR/PR at I-1. None of the statutory exceptions to cumulation applies.

⁴³ CR/PR at Tables II-12, II-13, and II-14.

⁴⁴ See CR/PR at Table II-11.

⁴⁵ CR/PR at Tables IV-5 and IV-6. U.S. producers and importers from each subject source reported U.S. shipments of BSS in all three width categories (less than 40 inches, between 40 and 60 inches, and greater than 60 inches) in 2022, with the exception of BSS from Taiwan, of which *** shipments greater than 60 inches in width were reported. CR/PR at Table IV-5. U.S. producers reported substantial shipments of BSS in all three load capacity categories (less than 1000 pounds, between 1000 pounds and 2000 pounds, and greater than 2000 pounds) in 2022. Imports of BSS from each subject source were predominantly of load capacity greater than 2000 pounds, with shipments of such imports reported from each subject source in 2022. Shipments of subject imports with load capacity of less than 1000 pounds were reported from Malaysia and Thailand, and shipments of imports of BSS with load capacity of between 1000 and 2000 pounds were reported from Malaysia and Vietnam in 2022. CR/PR at Table IV-6.

⁴⁶ CR/PR at Table II-2.

⁴⁷ CR/PR at Table II-2.

⁴⁸ CR/PR at Table II-2.

⁴⁹ CR/PR at Table II-3.

substantial volumes in 2022.⁵⁰ Subject imports from Malaysia entered the United States through the eastern and western borders of entry that year.⁵¹

Simultaneous Presence in Market. Domestically produced BSS and imports of BSS from subject sources were simultaneously present in the U.S. market throughout the POI.⁵² Official U.S. import statistics indicate that imports of BSS from Malaysia, Taiwan, and Vietnam were present in the U.S. market in all 45 months of the POI, while subject imports from Thailand were present in *** months.⁵³

Conclusion. The record indicates that subject imports from Malaysia, Taiwan, Thailand, and Vietnam are generally fungible with the domestic like product and each other. It also shows that subject imports from all sources 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 POI. Because there appears to be a reasonable overlap of competition between and among subject imports Malaysia, Taiwan, Thailand, and Vietnam and the domestic like product, we cumulate subject imports from these sources for our analysis of whether there is material injury by reason of subject imports.

V. Material Injury by Reason of Subject Imports

Based on the record in the final phase of this investigation, we find that an industry in the United States is materially injured by reason of imports of Malaysia, Taiwan, Thailand, and Vietnam that Commerce has found to be sold in the United States at less than fair value.

A. Legal Standards

In the final phase of antidumping and countervailing duty investigations, the Commission determines whether an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.⁵⁴ 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.⁵⁵ The statute defines “material injury” as “harm which is not inconsequential, immaterial, or unimportant.”⁵⁶ In assessing whether 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

⁵⁰ CR/PR at Table IV-7.

⁵¹ CR/PR at Table IV-7.

⁵² CR/PR at Table IV-8 and Tables V-4 – V-7 (showing sales of domestically produced BSS in every quarter of the POI).

⁵³ CR/PR at Table IV-8.

⁵⁴ 19 U.S.C. §§ 1671d(b), 1673d(b).

⁵⁵ 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).

⁵⁶ 19 U.S.C. § 1677(7)(A).

States.⁵⁷ 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.”⁵⁸

Although the statute requires the Commission to determine whether the domestic industry is “materially injured or threatened with material injury by reason of” unfairly traded imports,⁵⁹ it does not define the phrase “by reason of,” indicating that this aspect of the injury analysis is left to the Commission’s reasonable exercise of its discretion.⁶⁰ 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.⁶¹

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.⁶² In performing its examination, however, the Commission need not isolate

⁵⁷ 19 U.S.C. § 1677(7)(C)(iii).

⁵⁸ 19 U.S.C. § 1677(7)(C)(iii).

⁵⁹ 19 U.S.C. §§ 1671d(b), 1673d(b).

⁶⁰ *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).

⁶¹ 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).

⁶² 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, (Continued...)”).

the injury caused by other factors from injury caused by unfairly traded imports.⁶³ 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.⁶⁴ It is clear that the existence of injury caused by other factors does not compel a negative determination.⁶⁵

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.”⁶⁶ 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

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.

⁶³ 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.”).

⁶⁴ S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

⁶⁵ *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.”).

⁶⁶ *Mittal Steel*, 542 F.3d at 876 & 78; *see also id.* at 873 (“While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured ‘by reason of’ subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology.”) *citing United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75. In its decision in *Swiff-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission’s causation analysis as comporting with the Court’s guidance in *Mittal*.

sources to the subject imports.”⁶⁷ The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed “rigid adherence to a specific formula.”⁶⁸

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.⁶⁹ Congress has delegated this factual finding to the Commission because of the agency’s institutional expertise in resolving injury issues.⁷⁰

B. Conditions of Competition

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

1. Demand

BSS is a consumer product that is sold prepackaged in a kit, ready for assembly and installation for storage use in areas such as basements and garages.⁷¹ Edsal asserts that demand for BSS was strong in 2020 and 2021 due to increased home improvement activity during the COVID-19 pandemic, before beginning to decline in 2022 as the pandemic’s effects eased.⁷² Most responding U.S. producers, importers, and purchasers reported that demand for BSS had fluctuated down or steadily decreased since January of 2020.⁷³

Both U.S. producers, 6 of 12 responding U.S. importers, and 5 of 12 purchasers reported that the U.S. boltless steel shelving market is not subject to business cycles. However, according to Edsal, demand for BSS is affected to some degree by promotion-driven seasonality, with retailers typically promoting BSS “aggressively” in July-August and in December-February.⁷⁴ Several responding U.S. importers reported that demand for BSS increases during particular times of the year when consumers seek to organize their homes, for example, during the start of the year and in spring for “spring cleaning.”⁷⁵

⁶⁷ *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.

⁶⁸ *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.”).

⁶⁹ We provide in our discussion below a full analysis of other factors alleged to have caused any material injury experienced by the domestic industry.

⁷⁰ *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.”).

⁷¹ CR/PR at I-3, I-13.

⁷² Hearing Tr. at 34, 78 (White), 78-79 (Kruger); Edsal’s Prehearing Br. at 16.

⁷³ CR/PR at Table II-5.

⁷⁴ Edsal’s Prehearing Br. at 16.

⁷⁵ CR/PR at II-9.

During the POI, apparent U.S. consumption of BSS decreased overall by *** percent from 2020 to 2022, increasing from *** units in 2020 to *** units in 2021, before decreasing to *** units in 2022; it was *** percent lower in interim 2023, at *** units, than in interim 2022, at *** units.⁷⁶

2. Supply

The domestic industry was the largest source of supply of BSS to the U.S. market during the POI, although its share of apparent U.S. consumption declined *** percentage points between 2020 and 2022, decreasing from *** percent in 2020 to *** percent in 2021 and *** percent in 2022; it was higher in interim 2023, at *** percent, than in interim 2022, at *** percent.⁷⁷

The domestic industry's practical capacity utilization rate decreased from *** percent in 2020 to *** percent in 2021 and *** percent in 2022; it was slightly higher in interim 2023, at *** percent, than in interim 2022, at *** percent.⁷⁸ Both U.S. producers and *** responding importers reported that they had not experienced any supply constraints during the POI.⁷⁹

Cumulated subject imports were the second largest source of BSS in the U.S. market and gained market share from 2020 to 2022. 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 2022; it was lower in interim 2023, at *** percent, than in interim 2022, at *** percent.⁸⁰

Nonsubject imports were the smallest source of BSS in the U.S. market. Nonsubject imports, as a share of apparent U.S. consumption, increased *** percentage points from 2020 to 2022, from *** percent in 2020, to *** percent in 2021, and *** percent in 2022; their market share was higher in interim 2023, at *** percent, than in interim 2022, at *** percent.⁸¹ Thai producer Siam Metal Tech Co., Ltd., which received a *de minimis* final estimated dumping margin in the Commerce Department investigation and was therefore excluded from Commerce's final affirmative determination regarding Thailand, was the *** source of nonsubject imports during the POI, accounting for *** of nonsubject imports from all sources throughout the POI.⁸²

3. Substitutability and Other Conditions

We find that there is at least a moderate-to-high degree of substitutability between the domestic like product and cumulated subject imports. As discussed above, all responding U.S.

⁷⁶ CR/PR at Tables IV-9, C-1.

⁷⁷ CR/PR at Tables IV-9, C-1.

⁷⁸ CR/PR at Table III-5. The domestic industry's installed overall utilization rate increased from *** percent in 2020 to *** percent in 2021 before decreasing to *** percent in 2022; it was slightly lower in interim 2023, at *** percent, than in interim 2022, at *** percent. *Id.*

⁷⁹ CR/PR at II-8.

⁸⁰ CR/PR at Tables IV-9, C-1.

⁸¹ CR/PR at Tables IV-9, C-1.

⁸² CR/PR at Tables IV-9, C-1.

producers and U.S. importers, and most responding purchasers, reported that subject imports from each subject country were always or frequently interchangeable with each other and with domestically produced BSS.⁸³ In addition, when asked to compare subject imports with the domestic like product regarding 16 purchasing factors, most purchasers reported that U.S.-produced BSS was comparable to BSS from each subject country, with only a handful of exceptions.⁸⁴ In comparing domestically produced BSS with subject imports, *** domestic producers reported that differences other than price are *** significant, while most responding importers reported that differences other than price are sometimes or never significant.⁸⁵ Responses from purchasers were more mixed, with most responding purchasers indicating that differences other than price were frequently or sometimes significant.⁸⁶ Moreover, half (six of twelve) of responding purchasers reported that they purchased subject imports instead of domestically produced BSS during the POI.⁸⁷ The record also indicates, as noted previously, that domestically produced BSS and subject imports were sold in overlapping widths and load-bearing capacities.⁸⁸ Substitutability is limited to a degree by different lead times from domestic and subject sources.⁸⁹

We also find that price is an important factor in purchasing decisions. Responding purchasers most frequently ranked price and quality in their top three factors in purchasing decisions for BSS (10 firms each), with quality most frequently ranking as the first-most important factor (8 firms), followed by availability (2 firms), and price most frequently ranking as the second-most and third-most important factor (7 and 3 firms, respectively).⁹⁰ Eight of 12 responding purchasers reported that they sometimes or usually purchase the lowest-priced product, while four reported they never do so.⁹¹

BSS is a consumer product that is generally purchased by big box retailers or home improvement stores like Costco, Home Depot, Lowe's, Menard's, Sam's Club, and Walmart, as well as at hardware stores like Ace Hardware and Granger.⁹² Several large retailers, including ***, among others, directly imported large volumes of subject merchandise for retail sale in

⁸³ CR/PR at Tables II-12, II-13, and II-14.

⁸⁴ See CR/PR at Table II-11.

⁸⁵ CR/PR at Tables II-15 and II-16.

⁸⁶ CR/PR at Table II-17. Purchasers were evenly divided as to whether differences other than price were always or sometimes significant in comparing domestically produced BSS with imports from Malaysia, and as to whether such differences were frequently or never significant in comparing domestically produced BSS with imports from Taiwan. *Id.*

⁸⁷ CR/PR at Tables V-4 to V-11, V-22, V-23.

⁸⁸ See CR/PR at Tables IV-5 and IV-6.

⁸⁹ Boltless steel shelving is primarily sold from inventory. U.S. producers reported that *** percent of their commercial shipments in 2022 were from inventories, with lead times averaging *** days. The remaining *** percent of their commercial shipments were produced to order, with lead times averaging *** days. U.S. importers reported that *** percent of their commercial shipments in 2022 were from U.S. inventories, with lead times of *** days, while the remaining *** percent of commercial shipments were produced to order, with lead times averaging *** days. CR/PR at II-13.

⁹⁰ CR/PR at Table II-7.

⁹¹ CR/PR at II-12.

⁹² CR/PR at II-1.

addition to sourcing BSS domestically.⁹³ U.S. producers and importers reported that *** their BSS was sold through spot sales and that prices were not indexed to raw material costs.⁹⁴ According to Edsal, “line reviews” in which large purchasers reevaluate the offerings of existing and potential suppliers every one or two years, are a key condition of competition in the U.S. market.⁹⁵

BSS is primarily made from hot-rolled steel coil, with decking typically made from particle board or wire rack.⁹⁶ Prices for hot-rolled coil generally increased by *** percent over the POI, with a *** percent increase from January 2020 through September 2021, then fluctuating downward by *** percent through September 2023.⁹⁷ Raw materials were the largest component of the domestic industry’s cost of goods sold (“COGS”) and accounted for between *** and *** percent of total COGS during the period.⁹⁸

In February 2021, the Consumer Product Safety Commission (“CPSC”) announced a voluntary recall by Edsal for four of its BSS models ***.⁹⁹

BSS imported from China is subject to existing antidumping and countervailing duty orders, as well as an additional 25 percent *ad valorem* duty under section 301 of the Trade Act (“section 301 duties”).¹⁰⁰

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.”¹⁰¹

The volume of cumulated subject imports fluctuated but increased by 45.9 percent overall from 2020 to 2022, increasing from 1.3 million units in 2020 to 2.0 million units in 2021 before decreasing to 1.9 million units in 2022; cumulated subject import volume was 60.4 percent lower in interim 2023, at 593,127 units, than in interim 2022, at 1.5 million units.¹⁰² Cumulated subject imports’ share of apparent U.S. consumption increased by *** percentage points from 2020 to 2022, increasing from *** percent in 2020 to *** percent in 2021 and ***

⁹³ CR/PR at V-15 and Tables IV-1, V-13.

⁹⁴ CR/PR at V-4 and Table V-3.

⁹⁵ Hearing Tr. at 6 (Cannon), 19 (Kruger); Edsal’s Prehearing Br. at 20-21. An Edsal official testified at the hearing that “while the retailer does not commit to a set quantity as a result of a line review and there are no written contracts as a result of the line review, the winning manufacturer is committed to the low price it offers. There’s a general understanding that the winning bidder will supply all or most boltless steel shelving to that retailer until the next line review.” Hearing Tr. at 20 (Kruger).

⁹⁶ CR/PR at V-1.

⁹⁷ *Derived from* CR/PR at Table V-1.

⁹⁸ CR/PR Table VI-1.

⁹⁹ CR/PR at Table III-3; Edsal’s Prehearing Br. at Exh. 3. As discussed in Section V.E., *infra*, the record indicates that this recall did not have a significant influence on purchasers’ purchasing decisions.

¹⁰⁰ CR/PR at I-8-9.

¹⁰¹ 19 U.S.C. § 1677(7)(C)(i).

¹⁰² CR/PR at Tables IV-2, IV-3.

percent in 2022;¹⁰³ it was lower in interim 2023, at *** percent, than in interim 2022, at *** percent.¹⁰⁴

Based on the foregoing, we find that the volume of cumulated subject imports, and the increase in that volume, are significant in absolute terms and relative to consumption in the United States.¹⁰⁵

D. Price Effects of the Subject Imports

Section 771(7)(C)(ii) of the Tariff Act provides that, in evaluating the price effects of the 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

¹⁰³ CR/PR at Tables IV-9, C-1. As subject imports gained *** percentage points of market share during this period, the domestic industry lost *** percentage points of market share. As such, all of the market share gain by subject imports was at the expense of the domestic industry.

¹⁰⁴ CR/PR at Tables IV-9, C-1. Importers' U.S. shipments of cumulated subject imports, which are used to calculate apparent U.S. consumption, closely followed the trend of subject imports, increasing from *** units in 2020 to *** units in 2021 and declining to *** units in 2022; they were lower in interim 2023, at *** units, than in interim 2022, at *** units. CR/PR at Tables IV-9, C-1.

¹⁰⁵ After the filing of the petitions in April 2023, the domestic industry reported increased sales to certain retailers and experiencing less downward pressure on its prices. Hearing Tr. at 15, 63 (White). According to Edsal, following the filing of the petitions retailers delayed their sourcing decisions pending the outcome of these investigations, which enabled it to regain some of its lost market share in the post-petition period, as evident by the domestic industry's increased share of apparent U.S. consumption in interim 2023 compared with interim 2022 and cumulated subject imports' lower market share. Edsal's Prehearing Br. at 52-55, Exh. 3; Hearing Tr. at 63 (White). Edsal also reports that the pendency of these investigations allowed Edsal to avoid further price reductions with certain retailer customers. See Edsal's Prehearing Br. at Exh. 3. The record shows that the domestic industry's and cumulated subject imports' market share trends from 2020-2022 reversed between interim periods, as the domestic industry had *** percentage points more market share in interim 2023 than in interim 2022, while cumulated subject imports had *** percentage points less market share. CR/PR at Tables IV-9, C-1. We observe that that subject import volumes began to decline during the first few months of 2023, prior to the filing of the petitions. CR/PR at Table IV-8. Edsal contends that this decline was largely driven by the decline in demand during that time, as well as by an anti-circumvention petition filed in October 2022 targeting BSS from Malaysia that was allegedly circumventing the order on BSS from China. Edsal's Posthearing Br. at 10-13. We note that subject imports from Taiwan, Thailand, and Vietnam combined had *** percentage points less market share in interim 2023 than in interim 2022, indicating that the decline in cumulated subject import volume and market share in interim 2023 was not solely caused by reduced volume from Malaysia. CR/PR at Table C-1. Based on the foregoing, we find that changes in the volume, price effects, and impact of subject imports in interim 2023 were due, at least in part, to the pendency of these investigations. We therefore accord reduced weight to the interim 2023 data in making our determination of material injury, pursuant to 19 U.S.C. § 1677(7)(I).

(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.¹⁰⁶

As previously discussed in Section V.B.3, we find that the domestic like product and cumulated subject imports have at least a moderate-to-high degree of substitutability, and that price is an important factor in purchasing decisions for BSS.

We have examined multiple sources of data in our underselling analysis, including both pricing data and import purchase cost data. The Commission collected quarterly pricing data for the total quantity and f.o.b. value of four products shipped by U.S. producers and importers to unrelated customers from January 2020 through September 2023.¹⁰⁷ Both U.S. producers and two importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.¹⁰⁸ Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' total commercial U.S. shipments of BSS, *** percent of commercial U.S. shipments of subject imports from Malaysia, *** percent of commercial U.S. shipments of subject imports from Vietnam in 2022, and *** percent of commercial U.S. shipments of subject imports from Taiwan and Thailand.¹⁰⁹

The pricing data show underselling by subject imports. Subject imports undersold the domestic like product in 34 of 36 (or 94.4 percent of) quarterly comparisons, at margins ranging between *** and *** percent and averaging *** percent.¹¹⁰ Subject imports oversold the domestic like product in the remaining two (or 5.6 percent of) quarterly comparisons, at margins ranging from *** to *** percent and averaging *** percent.¹¹¹ The pricing data also show underselling accounting for the vast majority of subject imports' volume. Quarters in which there was underselling accounted for *** percent of reported subject import sales

¹⁰⁶ 19 U.S.C. § 1677(7)(C)(ii).

¹⁰⁷ 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/riev 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/riev 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/riev 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.

¹⁰⁸ CR/PR at V-6.

¹⁰⁹ CR/PR at V-6. As discussed previously, many retailers directly imported large volumes of subject merchandise during the POI. As a result, purchase cost data, which cover retailers' direct imports, represent a much larger share of subject imports than are represented by these pricing data. We discuss these data below.

¹¹⁰ CR/PR at Tables V-4 — V-7, V-17.

¹¹¹ CR/PR at Tables V-4 — V-7, V-17.

volume (***) units), while quarters in which there was overselling accounted for *** percent of reported of subject import sales volume (***) units).¹¹²

The Commission also collected landed duty-paid (“LDP”) import purchase cost data for the same four pricing products from firms that imported these products from subject sources for retail sale.¹¹³ Six importers reported import purchase cost data, which accounted for approximately *** percent of imports from Malaysia, *** percent of imports from Taiwan, *** percent of subject imports from Thailand, and *** percent of imports from Vietnam in 2022.¹¹⁴ LDP costs for subject imports were below the sales price for the domestic like product in 79 of 114 (or 69.3 percent of) quarterly comparisons (involving *** units), at price-cost differentials ranging from 0.4 percent to 53.9 percent and averaging *** percent.¹¹⁵ LDP costs for subject imports were higher than the sales price for the domestic like product in the remaining 35 (or 30.7 percent of) quarterly comparisons (involving *** units), at price-cost differentials ranging from 0.0 percent to 109.7 percent and averaging *** percent.¹¹⁶ Quarters in which import purchase costs were lower than domestic prices accounted for a substantial majority (*** percent) of the quantity of reported subject imports.¹¹⁷

We recognize that the import purchase cost data may not reflect the total cost of importing and we therefore requested additional information regarding the costs and benefits of importing BSS directly. Two of six importers which provided import purchase cost data reported that they incurred additional costs beyond those included in the LDP cost by importing BSS directly rather than purchasing from a U.S. producer or importer, and estimated them at 3 percent and 30 percent.¹¹⁸ Retailer/importers were also asked whether the price they paid for imported BSS was lower than the price of BSS purchased from U.S. producers or importers. Five responding retailer/importers reported paying less by importing BSS rather than

¹¹² Derived from CR/PR at Table V-17.

¹¹³ Four of six responding importers reported that they compare costs of importing to the cost of purchasing from a U.S. producer or importer in determining whether to import BSS. CR/PR at V-15.

¹¹⁴ Derived from U.S. Importer Questionnaire Response of *** (Jan. 22, 2024) at III-3; U.S. Importer Questionnaire Response of *** (Jan. 24, 2024) at III-3; U.S. Importer Questionnaire Response of *** (Mar. 13, 2024) at III-3; U.S. Importer Questionnaire Response of *** (Jan. 29, 2024) at III-3; U.S. Importer Questionnaire Response of *** (Mar. 13, 2024) at III-3; U.S. Importer Questionnaire Response of *** (Apr. 23, 2024) at III-3; CR/PR at V-15, Table IV-2.

¹¹⁵ CR/PR at Tables V-8 — V-11, V-19.

¹¹⁶ CR/PR at Tables V-8 — V-11, V-19.

¹¹⁷ Derived from CR/PR at Table V-19.

¹¹⁸ CR/PR at V-15; *** estimated additional costs as 3 percent and 30 percent, respectively, compared to LDP value. U.S. Importer Questionnaire Response of *** (Apr. 23, 2024) at III-3h; U.S. Importer Questionnaire Response of *** (Jan. 29, 2024) at III-3h. Reported costs include handling costs and in-house quality control. CR/PR at V-15. We note that *** was the largest purchaser/importer of subject imports over the POI, accounting for *** percent of responding purchasers’ total purchases and imports of subject imports (***) units of a total of *** units). CR/PR at Table V-21. *** also reported that it imported subject merchandise primarily because they were lower priced than domestic product and that it imported *** units of subject imports for this reason. CR/PR at Table V-22. In other words, notwithstanding the added costs reported by *** for its imports of subject merchandise, *** acknowledges that over one-half (*** percent) of those imports were made primarily due to their lower price compared to the price of the domestic like product.

purchasing from U.S. producers or importers, with estimated savings ranging between *** percent of the purchase price.¹¹⁹ Given the above, including that subject import purchase costs were on average *** percent below domestic sales prices in the quarters in which the import purchase costs were lower than domestic prices, factoring in the reported additional costs of importing does not change our conclusion that subject import purchase costs were generally lower than domestic sales prices.

Evidence in the record regarding lost sales and revenue corroborate that subject imports were sold at lower prices than the domestic like product during the POI. All six responding purchasers reporting that they purchased subject imports instead of domestically produced BSS during the POI also reported that subject import prices were lower than U.S. prices, and three of the six reported purchasing *** units of subject imports instead of domestically produced BSS primarily because of their lower price,¹²⁰ representing *** percent of responding purchasers' total purchases and imports of subject merchandise,¹²¹ *** percent of U.S. shipments of subject imports over the entire POI, and *** percent of apparent U.S. consumption over the entire POI.¹²²

Given the above, as well as the at least moderate-to-high degree of substitutability and the importance of price in purchasing decisions, we find that subject import underselling was significant during the POI. We also find that the underselling caused the domestic industry to lose sales and led to a substantial market share shift to cumulated subject imports, which gained *** percentage points of market share during the 2020-2022 period at the expense of the domestic industry.¹²³

We have also considered price trends during the POI. The domestic industry's sales prices generally increased for all four pricing products for which data are available. U.S. producers' prices were stable through 2020, then increased beginning in the first quarter of 2021, and peaked in the second quarter of 2022 before more gradually declining through the third quarter of 2023, for overall increases from January 2020 to September 2023 ranging from *** to *** percent, depending on the product.¹²⁴ Prices for cumulated subject imports followed similar trends, and cumulated subject import purchase costs fluctuated but followed a largely similar overall trend for all four pricing products during the POI, with prices remaining

¹¹⁹ CR/PR at V-15-16. *** reported that directly importing BSS saved ***, and *** reported that ***. U.S. Importer Questionnaire Response of *** (Jan. 29, 2024) at III-3j; U.S. Importer Questionnaire Response of *** (Apr. 23, 2024) at III-3j. We note that ***, combined, accounted for *** percent of responding purchasers' total imports and purchases of subject imports over the POI. *Calculated from* CR/PR at Table V-21. In addition, *** and *** reported saving 10 percent of the purchase price by importing boltless steel shelving. CR/PR at V-16.

¹²⁰ CR/PR at V-42-43 and Tables V-22 & V-23.

¹²¹ *Derived from* CR/PR at Tables V-21 and V-22.

¹²² *Derived from* CR at Tables V-22, IV-9, and C-1.

¹²³ CR/PR at Tables IV-9, C-1. Although subject imports' share of apparent U.S. consumption was *** percentage points lower in interim 2023 than in interim 2022, as discussed previously, we have found that the lower subject import volume and market share in interim 2023 was due, at least in part, to the pendency of these investigations. Therefore, pursuant to 19 U.S.C. § 1677(7)(I), we have accorded reduced weight to the interim 2023 data in our material injury analysis.

¹²⁴ See CR/PR at Tables V-4 – V-7, V-12, V-14, Fig. V-10.

fairly steady in 2020, fluctuating upward beginning in 2021, peaking in 2022 and then ending lower in 2023.¹²⁵

We have also considered whether cumulated subject imports prevented price increases for the domestic like product which otherwise would have occurred to a significant degree. We observe that the domestic industry's COGS to net sales ratio increased from *** percent in 2020 to *** percent in 2021 before decreasing to *** percent in 2022, a level *** percentage points higher than in 2020.¹²⁶ The domestic industry's total net sales average unit value ("AUV") increased by \$*** per unit (*** percent) from 2020 to 2021, and by \$*** per unit (*** percent) from 2021 to 2022, for an overall increase of \$*** per unit (*** percent) from 2020-2022.¹²⁷ The industry's total COGS increased by \$*** per unit (*** percent) from 2020 to 2021, and by \$*** per unit (*** percent) from 2021 to 2022, for an overall increase of \$*** per unit (*** percent) from 2020 to 2022.¹²⁸ Accordingly, the increases in domestic producers' net sales AUVs *** increases in their per-unit costs from 2020 to 2021 but *** the cost increases between 2021 and 2022, such that over the 2020-2022 period the domestic producers' net sales unit value increased by more than per-unit COGS (*** per unit compared to \$*** per unit) and slightly lagged on a percentage basis (*** percent compared to *** percent).^{129 130}

As discussed previously, raw material costs, which accounted for the majority of COGS, increased by *** percent from January 2020 through September 2021, then fluctuated downward to a level in December 2022 *** percent higher than in January 2020.¹³¹ In describing how rising steel prices are problematic for its business, an Edsal official described the "quite lengthy" process of seeking and receiving approval from customers for cost-related price increases, testifying that it typically takes three to four months to gain customers' approval for

¹²⁵ See CR/PR at Tables V-8 — V-11, V-12, V-13, Fig. V-12. Although pricing data for subject imports were not available for all quarters, cumulated subject import sales prices also fluctuated but generally increased during the POI. See CR/PR at Tables V-4 — V-7.

¹²⁶ CR/PR at Tables VI-1, C-1. Domestic producers' COGS to net sales ratio was lower in interim 2023, at *** percent, than in interim 2022, at *** percent. Total net sales increased from \$*** in 2020 to \$*** in 2021 and \$*** in 2022; they were lower in interim 2023, at \$***, than in interim 2022, at \$***. Total COGS increased from \$*** in 2020 to \$*** in 2021 and \$*** in 2022; they were lower in interim 2023, at \$***, than in interim 2022, at \$***. *Id.*

¹²⁷ CR/PR at Tables VI-1, VI-2, C-1. Total net sales AUVs were \$*** per unit (*** percent) lower in interim 2023 than in interim 2022, while per-unit COGS were \$*** per unit (*** percent) lower in interim 2023 than in interim 2022. *Id.*

¹²⁸ CR/PR at Tables VI-1, VI-2.

¹²⁹ CR/PR at Tables VI-1, VI-2. Commissioner Kearns observes that as the domestic industry's net sales AUVs *** rising costs from 2020 to 2021, the domestic industry's COGS to net sales ratio increased *** percentage points during a period of rising consumption. Net sales quantities, however, decreased by *** percentage points between 2020 and 2021. CR/PR at Tables VI-1, C-1. The domestic industry's costs were thus spread over fewer sales during this period.

¹³⁰ Between the interim periods, domestic producers' net sales unit value was \$*** lower per unit in interim 2023 than in interim 2022, while unit COGS were \$*** lower per unit. As noted above, we find that changes in the volume, price effects, and impact of subject imports in interim 2023 were due, at least in part, to the pendency of these investigations. We therefore accord reduced weight to the interim 2023 data in making our determination of material injury, pursuant to 19 U.S.C. § 1677(7)(I).

¹³¹ Derived from CR/PR at Table V-1.

such price increases.¹³² As previously noted, U.S. producers sold *** their BSS through spot sales, and sales are not indexed to raw material costs. Nevertheless, as raw material prices rapidly increased from 2020 to 2021, domestic producers increased prices for the four pricing products; as raw material prices moderated in 2022, domestic producers were generally able to maintain their price levels.¹³³ Overall, from 2020 to 2022, despite a *** percent decline in apparent U.S. consumption, domestic producers increased prices by *** percent to *** for the pricing products.¹³⁴ Similarly, the AUV of the domestic industry's U.S. shipments increased by *** percent, while the AUV of the industry's net sales increased by *** percent over this time.¹³⁵ Therefore, we do not conclude that cumulated subject imports prevented price increases which otherwise would have occurred to a significant degree.

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

E. Impact of the Subject Imports¹³⁶

Section 771(7)(C)(iii) of the Tariff Act provides that examining the impact of subject imports, the Commission "shall evaluate all relevant economic factors which have a bearing on

¹³² Hearing Tr. at 46-47 (White) ("We have to go in and justify that, and, typically, it's a three to four month period to get that approved for that price increase, which, in a period of time when steel is almost doubling month over month, is very problematic for us."). We note that *** largest purchasers of domestically produced BSS, ***, did not *** during the POI. CR/PR at Table V-21.

¹³³ *Derived from* CR/PR at Tables V-1, V-4—V-7. As noted previously, the coverage provided by the pricing data for the domestic like product was substantial, accounting for *** percent of the domestic industry's total U.S. shipments for the POI. CR/PR at Tables V-12 and III-9.

¹³⁴ *Derived from* CR/PR at Tables V-4—V-7. We also note that of the 12 responding purchasers, one reported that U.S. producers had reduced prices in order to compete with lower-priced subject imports by an estimated *** percent; six reported that they had not; and five reported that they did not know. CR/PR at V-43, Table V-24.

¹³⁵ See CR/PR at Tables VI-1, C-1.

¹³⁶ The statute instructs the Commission to consider the "magnitude of the dumping margin" in an antidumping proceeding as part of its consideration of the impact of imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final determinations of sales at less value, with respect to BSS from Malaysia, Commerce found antidumping duty margins ranging from 58.29 to 81.12 percent; in its final determination with respect to BSS from Taiwan, Commerce found antidumping duty margins ranging from 8.09 to 78.12 percent; in its final determination with respect to subject BSS from Thailand, Commerce found an antidumping duty margin of 2.75 percent for subject producers; and in its final determination with respect to BSS from Vietnam, Commerce found antidumping duty margins ranging from 181.60 to 224.94 percent. CR/PR at Tables I-2 — I-4. We take into account in our analysis the fact that Commerce has made final findings that all subject producers in Malaysia, Taiwan, Thailand, and Vietnam, with the exception of Siam Metal Tech Co., Ltd., are selling subject imports in the United States at less than fair value. Further, our analysis of the significant underselling of subject imports, described in both the price effects discussion and below, is particularly probative to an assessment of the impact of the subject imports.

the state of the industry.”¹³⁷ These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debts, 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.”¹³⁸

By almost every measure, the domestic industry’s performance declined from 2020 to 2022.¹³⁹ As cumulated subject imports captured market share from the domestic industry, the domestic industry’s output indicators – including production, U.S. shipments, and its capacity utilization rate – fell by a substantially greater percentage than the decline in apparent U.S. consumption, and the industry’s financial condition declined as domestic producers suffered reduced sales and revenues along with increasing per-unit costs.

The domestic industry’s production,¹⁴⁰ capacity,¹⁴¹ capacity utilization,¹⁴² and U.S. shipments¹⁴³ all declined from 2020 to 2022 and were generally lower in interim 2023

¹³⁷ 19 U.S.C. § 1677(7)(C)(iii); *see also* SAA at 851 and 885 (“In material injury determinations, the Commission considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they also may demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.”).

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

¹³⁹ In interim 2023, as subject import volumes declined, the domestic industry regained market share, generally leading to improved performance. Indeed, *** of the gain in market share by the domestic industry during interim 2023 was at the expense of subject imports. *Calculated from* CR/PR at Tables IV-9, C-1. However, as discussed previously, we have found that the volume and market share of subject imports was affected, at least in part, by the pendency of these investigations. We also find that the pendency of the investigations affected the domestic industry’s performance, including its performance indicators in interim 2023. Therefore, we accord reduced weight to the data used to assess the impact of subject imports for interim 2023, pursuant to 19 U.S.C. § 1677(7)(I).

¹⁴⁰ CR/PR at Tables III-7, C-1. U.S. producers’ production decreased by *** percent from 2020 to 2022, decreasing from *** units in 2020 to *** units in 2021 and *** units in 2022; it was lower in interim 2023 (*** units) than in interim 2022 (*** units).

¹⁴¹ CR/PR at Tables III-7, C-1. U.S. producers’ practical production capacity decreased by *** percent from 2020 to 2022, declining from *** units in 2020 to *** units in 2021 and *** units in 2022; it was *** percent lower in interim 2023, at *** units than in interim 2022, at *** units. *Id.*

U.S. producers’ installed overall capacity was unchanged from 2020 to 2022, at *** units, and in the interim periods, at *** units. CR/PR at Table III-5.

¹⁴² CR/PR at Tables III-7, C-1. U.S. producers’ capacity utilization decreased from *** percent in 2020 to *** percent in 2021 and *** percent in 2022; it was higher in interim 2023 (*** percent) than in interim 2022 (*** percent). *Id.*

¹⁴³ CR/PR at Tables III-9, C-1. The domestic industry’s U.S. shipments decreased by *** percent from 2020 to 2022, decreasing from *** units in 2020 to *** units in 2021 and *** units in 2022; they were *** percent lower in interim 2023 (*** units) than in interim 2022 (*** units). By value, the domestic industry’s U.S. shipments increased overall by *** percent from 2020 to 2022, first increasing (Continued...)

compared with interim 2022. The domestic industry's market share decreased by *** percentage points from 2020 to 2022, declining from *** percent in 2020 to *** percent in 2021 and *** percent in 2022; it was higher in interim 2023, at *** percent, than in interim 2022, at *** percent.¹⁴⁴ End-of-period inventories declined overall during the POI.¹⁴⁵

The domestic industry's employment indicia followed similar trends, declining from 2020 to 2022 and experiencing some improvement in interim 2023 compared to interim 2022. The industry's number of production related worked ("PRWs"),¹⁴⁶ total hours worked,¹⁴⁷ wages paid,¹⁴⁸ and productivity,¹⁴⁹ all declined from 2020 to 2022. The industry's unit labor costs increased over the POI.¹⁵⁰

The domestic industry's financial indicia deteriorated from 2020 to 2021 before improving somewhat in 2022, resulting in an overall decline in performance between 2020 and 2022; the financial indicia were generally improved in interim 2023 compared to interim 2022. The domestic industry's net sales,¹⁵¹ gross profits,¹⁵² operating income,¹⁵³ and net income,¹⁵⁴

from \$*** in 2020 to \$*** in 2021, then decreasing to \$*** in 2022; they were *** percent lower in interim 2023 (\$***) than in interim 2022 (\$***). *Id.*

¹⁴⁴ CR/PR at Tables IV-9, C-1.

¹⁴⁵ CR/PR at Tables III-10, C-1. U.S. producers' end-of-period inventories decreased *** percent overall from 2020 to 2022, declining from *** units in 2020 to *** units in 2021 before increasing to *** units in 2022; they were lower in interim 2023 (*** units) than in interim 2022 (*** units). *Id.*

¹⁴⁶ The industry's PRWs decreased from *** in 2020 to *** in 2021 and *** in 2022; they were higher in interim 2023 (***) than in interim 2022 (***). CR/PR at Tables III-13, C-1.

¹⁴⁷ Total hours worked (in thousands of hours) decreased from *** in 2020 to *** in 2021 and *** in 2022; they were lower in interim 2023 (***) than in interim 2022 (***). CR/PR at Tables III-13, C-1.

¹⁴⁸ Wages paid decreased from \$*** in 2020 to \$*** in 2021 and \$*** in 2022; they were higher in interim 2023 (\$***) than in interim 2022 (\$***). CR/PR at Tables III-13, C-1.

¹⁴⁹ Productivity decreased by *** percent overall from 2020 to 2022, first increasing from *** units per hour in 2020 to *** units per hour in 2021, then decreasing to *** units per hour in 2022; productivity was lower in interim 2023 (*** units per hour) than in interim 2022 (*** units per hour). CR/PR at Tables III-13, C-1.

¹⁵⁰ U.S. producers' unit labor costs increased from \$*** per unit in 2020 to \$*** per unit in 2020 and \$*** per unit in 2022, an overall increase of *** percent; they were higher in interim 2023 (\$*** per unit) than in interim 2022 (\$*** per unit). CR/PR at Tables III-13, C-1.

¹⁵¹ The domestic industry's net sales by value increased by *** percent from 2020 to 2022, increasing from \$*** in 2020 to \$*** in 2021 before decreasing to \$*** in 2022; they were lower in interim 2023 (\$***) than in interim 2022 (\$***). Unit net sales values increased from \$*** per unit in 2020 to \$*** per unit in 2021 and \$*** per unit in 2022; they were \$*** per unit in interim 2023 compared with \$*** per unit in interim 2022. CR/PR at Tables VI-1, C-1.

¹⁵² Gross profits decreased from \$*** in 2020 to \$*** in 2021 before increasing to \$*** in 2022, an overall decrease of *** percent; they were higher in interim 2023 (\$***) than in interim 2022 (\$***). CR/PR at Table C-2.

¹⁵³ CR/PR at Tables VI-1, C-1. Operating income was \$*** in 2020, \$*** in 2021, and *** in 2022; it was higher in interim 2023, at \$*** than in interim 2022, at ***.

¹⁵⁴ CR/PR at Tables VI-1, C-1. Net income was \$*** in 2020, *** in 2021, and *** in 2022; it was higher in interim 2023, at \$***, than in interim 2022, at ***. *Id.*

all declined overall from 2020 to 2022, as did the industry's profit margins. Operating income as a ratio to net sales declined from *** percent in 2020 to *** percent in 2021, before increasing to *** percent in 2022, an overall decline of *** percentage points.¹⁵⁵ Capital expenditures and research and development ("R&D") spending fluctuated, with a substantial increase in 2022.¹⁵⁶

The record shows that from 2020 to 2022, during a period of declining consumption, significant volumes of low-priced cumulated subject imports entered the United States, significantly undersold the domestic like product, and gained *** percentage points of market share entirely at the expense of the domestic industry, which reported an increasing quantity of unused practical capacity over the POI. As a result, the domestic industry's production, sales, and revenues were lower than they otherwise would have been. Based on the foregoing, we find that cumulated subject imports had a significant impact.

We have 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 other factors to subject imports. As described above, nonsubject imports were the smallest source of BSS in the U.S. market. While nonsubject imports, as a share of apparent U.S. consumption, increased by *** percentage points from 2020 to 2022, they do not explain the injury resulting from cumulated subject imports' increase of *** percentage points at the expense of the domestic industry during that time.¹⁵⁷ We also observe that the *** units of confirmed sales lost primarily due to lower import prices are specific to subject imports.¹⁵⁸ Therefore, we find that nonsubject imports do not explain the extent of the domestic industry's declines in performance during the POI.

As previously mentioned, in February 2021 the CPSC announced a voluntary recall by Edsal on four of its BSS products ***.¹⁵⁹ The record indicates this recall did not have a significant influence on purchasers' purchasing decisions. Only three out of 12 responding purchasers reported that they were aware of the recall, and two of 12 reported that they had been impacted by product recalls.¹⁶⁰ Of those that were aware of the recall, both reported that

¹⁵⁵ CR/PR at Tables VI-1, C-1. Operating income as a ratio to net sales was higher in interim 2023, at *** percent, than in interim 2022, at *** percent. *Id.*

Net income as a ratio to net sales declined from *** percent in 2020 to *** percent in 2021 before increasing to *** percent in 2022; it was higher in interim 2023 (*** percent) than in interim 2022 (*** percent). *Id.*

¹⁵⁶ CR/PR at Tables VI-6, VI-8, C-1. Capital expenditures decreased from \$*** in 2020 to \$*** in 2021 before increasing to \$*** in 2022; they were \$*** in interim 2023 compared with \$*** in interim 2022. R&D expenditures increased from \$*** in 2020 to \$*** in 2021 and \$*** in 2022, an overall increase of *** percent; they were \$*** in interim 2023 compared with and \$*** in interim 2022. CR/PR at Tables VI-8, C-1. Edsal explained that ***. CR/PR at VI-18 n.17.

¹⁵⁷ CR/PR at Tables IV-9, C-1. Nonsubject imports' market share increased from *** percent in 2020, to *** percent in 2021, and *** percent in 2022; it was higher in interim 2023, at *** percent, than in interim 2022, at *** percent. *Id.*

¹⁵⁸ CR/PR at Table V-22.

¹⁵⁹ CR/PR at Table III-3; Edsal's Prehearing Br. at Exh. 3.

¹⁶⁰ CR/PR at II-11.

the recall did not affect their purchasing decisions during the POI.¹⁶¹ In fact, ***.¹⁶² In addition, we note that all responding purchasers reported that domestically produced BSS was comparable or superior to BSS from each subject country regarding the purchasing factors “quality meets industry standards” and “quality exceeds industry standards,” and all but one purchaser reported that the domestic product was comparable or superior to BSS from each subject country on “product consistency.”¹⁶³ Thus, Edsal’s product recall does not explain the shift in market share from the domestic industry to cumulated subject imports over the POI.

As noted above, apparent U.S. consumption decreased from 2020 to 2022. The declines in apparent U.S. consumption, however, do not explain the larger declines in the domestic industry’s output during this period, nor do they explain the domestic industry’s loss of market share to cumulated subject imports. From 2020 to 2022, as apparent U.S. consumption declined by *** percent, subject imports gained *** percentage points of market share and the domestic industry’s production declined by *** and U.S shipments declined by *** percent.¹⁶⁴ Therefore, the lost sales and market share from the domestic industry to low-priced subject imports indicate that the decline in demand alone does not account for the domestic industry’s declining performance during the POI.

Consequently, we conclude that other causes do not explain the injury we have attributed to the cumulated subject imports. We accordingly determine that the domestic industry is materially injured by reason of cumulated subject imports.

VI. Conclusion

For the reasons stated above, we determine 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 sold in the United States at less than fair value.

¹⁶¹ CR/PR at II-11; Purchaser Questionnaire Response of *** (Jan. 23, 2024) at III-22; Purchaser Questionnaire Response of *** (Jan. 31, 2024) at III-22; *see also* Edsal’s Prehearing Br. at 48-51.

¹⁶² Purchaser Questionnaire Response of *** (Jan. 23, 2024) at III-22; CR/PR at Table V-22.

¹⁶³ CR/PR at Table II-11.

¹⁶⁴ CR/PR at Tables IV-9, III-7, III-9, C-1.

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”)¹ from Malaysia, Taiwan, Thailand, and Vietnam.² Table I-1 presents information relating to the background of these investigations.³

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)
June 9, 2023	Commission’s preliminary determinations (88 FR 38894, June 14, 2023)
November 29, 2023	Commerce’s preliminary determinations (88 FR 83382, 88 FR 83386, 88 FR 83389, 88 FR 83392, 88 FR 83395, November 29, 2023); scheduling of final phase of Commission investigations (88 FR 85914, December 11, 2023)
April 11, 2024	Commission’s hearing
April 12, 2024	Commerce’s final determinations (89 FR 28736, 89 FR 28738, 89 FR 28741, 89 FR 28743, 89 FR 28746, April 19, 2024)
May 14, 2024	Commission’s vote
June 3, 2024	Commission’s views

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

² The petitions also alleged an industry in the United States is materially injured and threatened with material injury by reason of LTFV imports of boltless steel shelving from India. On April 19, 2024, Commerce published notice in the Federal Register of its negative final determination of sales at LTFV with respect to imports from India. 89 FR 28746, April 19, 2024. Accordingly, the Commission terminated its investigation with respect to India. 89 FR 33395, April 29, 2024.

³ Pertinent Federal Register notices are referenced in appendix A, and may be found at the Commission’s website (www.usitc.gov).

Statutory criteria

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

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

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

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

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

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

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

Organization of report

Part I of this report presents information on the subject merchandise, 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 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 Malaysia is ***. The leading U.S. importer of boltless steel shelving from Taiwan and Vietnam is ***, and *** are leading U.S. importers of shelving from Thailand. Leading importers of boltless steel shelving from nonsubject sources include ***. U.S. purchasers of boltless steel shelving are primarily retailers; leading purchasers include ***.

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

Apparent U.S. consumption of 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 1.8 million units (\$131.3 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 12 importers that accounted for (in 2022):

- *** 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; and
- *** percent of official import statistics for nonsubject sources.⁶

⁶ Under HTS statistical reporting number 9403.20.0075, as adjusted to exclude out-of-scope imports reported in questionnaire data. Coverage for Thailand and "subject sources" includes imports from Siam Metal Tech Co., Ltd. ("Siam Metal") in Thailand, which was assigned a de minimis margin by Commerce in its final determination regarding Thailand and is otherwise treated as nonsubject in this staff report. Eonmetall, which was the only firm in Malaysia preliminarily assigned a de minimis margin by Commerce (and thus generally treated as nonsubject in the prehearing report), was assigned an 81.12 percent dumping margin based on adverse facts available by Commerce in its final determination. Therefore, all imports from Malaysia are treated as subject in this staff report. As reported on p. I-1, the Commission terminated its investigation with respect to India following Commerce's negative final determination of sales at LTFV with respect to imports from India. As in the prehearing report, imports from India are treated as nonsubject in this staff report.

Petitioner asserts that entries into the U.S. under this HTS number from Canada, China, Mexico, and South Korea, which combined account for 87.0 percent of nonsubject imports reported in official import statistics in 2022, are misclassified. See Petition, pp. 12-13. For more information, see part IV.

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.⁷ 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 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.⁸ On May 12, 2021 Commerce published a notice in the *Federal Register* continuing the orders.⁹

Nature and extent of sales at LTFV

Sales at LTFV

On April 19, 2024, Commerce published notices in the Federal Register of its final determination of sales at LTFV with respect to imports from Malaysia, Taiwan, Thailand, and Vietnam.¹⁰ Commerce determined that imports of boltless steel shelving from India are not being, or not likely, to be sold in the United States at LTFV.¹¹ Tables I-1 through I-4 present Commerce's dumping margins with respect to imports of product from Malaysia, Taiwan, Thailand, and Vietnam.

⁷ 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.

⁸ 86 FR 23981, May 5, 2021.

⁹ 86 FR 26000, May 12, 2021.

¹⁰ 89 FR 28736, 89 FR 28738, 89 FR 28741, and 89 FR 28743, April 19, 2024.

¹¹ 89 FR 28746, April 19, 2024.

Table I-1**Boltless steel shelving: Commerce's final weighted-average LTFV margins with respect to imports from Malaysia, by exporter**

Producer/exporter	Final dumping margin (percent)
Eonmetall Industries Sdn. Bhd	81.12
Nanjing Chervon Industry Co., Ltd	81.12
Wuxi Bote Electrical Apparatus Co., Ltd	81.12
All others	58.29

Source: 89 FR 28736, April 19, 2024.

Table I-2**Boltless steel shelving: Commerce's final weighted-average LTFV margins with respect to imports from Taiwan, by exporter**

Producer/exporter	Final dumping margin (percent)
Taiwan Shin Yeh Enterprise Co., Ltd	8.09
Jin Yi Sheng Industrial Co., Ltd	78.12
All others	8.09

Source: 89 FR 28741, April 19, 2024.

Table I-3**Boltless steel shelving: Commerce's final weighted-average LTFV margins with respect to imports from Thailand, by exporter**

Producer/exporter	Final dumping margin (percent)
Siam Metal Tech Co., Ltd.	0.00
Bangkok Sheet Metal Public Co.	2.75
All others	2.75

Source: 89 FR 28738, April 19, 2024.

Table I-4**Boltless steel shelving: Commerce's final weighted-average LTFV margins with respect to imports from Vietnam, by exporter**

Producer/exporter	Final dumping margin (percent)
Xinguang (Vietnam) Logistic Equipment Co., Ltd.	181.60
All others	224.94

Source: 89 FR 28743, April 19, 2024.

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:¹²

The scope of this investigation 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 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

¹² 88 FR 83382, 88 FR 83386, 88 FR 83389, 88 FR 83392, and 88 FR 83395, November 29, 2024.

(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 9403.20.00.¹³ 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.¹⁴ Effective May 10, 2019, boltless steel shelving originating in China, being subject to existing antidumping and countervailing duty orders,¹⁵ is also subject to an additional 25

¹³ See also statistical note 2 to HTS Chapter 94. USITC, HTSUS (2024) Revision 1, USITC Publication 5491, January 2024, pp. 94-2, 94-8, 94-22.

¹⁴ 83 FR 11625, March 15, 2018; 85 FR 5281, January 29, 2020.

¹⁵ 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.

percent ad valorem duty under section 301 of the Trade Act of 1974, as amended.¹⁶ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

The product

Description and applications¹⁷

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).¹⁸ The boltless system permits assembly with only minimal tools.¹⁹

¹⁶ 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 (2024) Revision 1, USITC Publication 5491, January 2024, pp. 99-III-27 – 99-III-28, 99-III-51, 99-III-225, 99-III-231 – 99-III-232, 99-III-241, 99-III-244 – 99-III-246, 99-III-301, 99-III-303, 99-III-305 – 99-III-307, 99-III-309.

¹⁷ Unless otherwise noted, this information is based on USITC, Boltless Steel Shelving Units Prepackaged for Sale from India, Malaysia, Taiwan, Thailand, and Vietnam, Investigation Nos. 731-TA-1607-1611 (Preliminary), USITC publication 5434, June 2023 (“preliminary publication”), pp. I-8 – I-12.

¹⁸ 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.

***. Staff field visit notes, February 27, 2024, p. 2.

¹⁹ 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 utility and durability over aesthetic appearance



Source: Petition, p. 9.

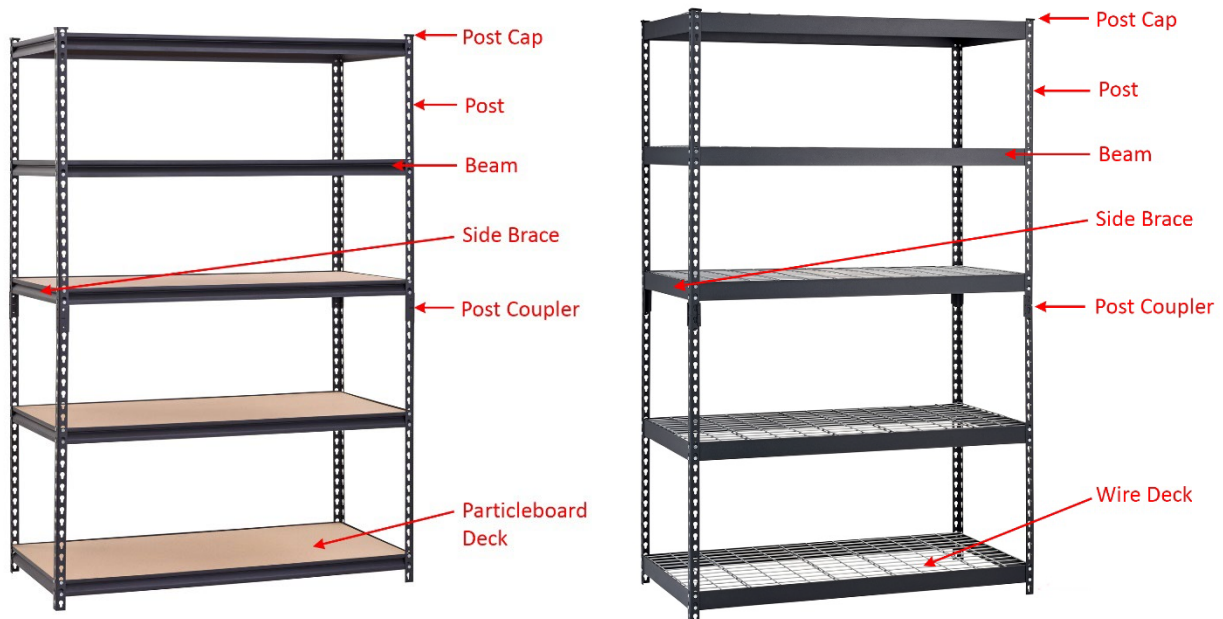
Description

Boltless steel shelving has a relatively high load capacity and consists 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 are sold as a prepackaged unit, containing all the vertical and horizontal components, and are available in several common sizes. Since boltless steel shelving is prepackaged, the end user can readily purchase the unit at large home-improvement and mass-merchandise retailers, on-line retailers, and major hardware chain stores.²⁰ The units may be sold with or without

²⁰ Home Depot Inc., Lowe's Companies Inc., Costco Wholesale Corp., Menards, Sam's Club, and Walmart Inc. are six of the largest retailers in the U.S. market and purchase boltless steel shelving from Edsal. Online retailers selling boltless steel shelving include Amazon.com, Homedepot.com, and Lowes.com. Major hardware chain stores selling boltless steel shelving include Ace Hardware Corp. and W.W. Grainger Inc. Hearing transcript, p. 10 (White); Edsal's prehearing brief, exh. 3: Declaration of Chris Kruger, p. 1.

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).²¹ Boltless steel shelving uses several configurations of beam and brace profiles to provide high load-bearing capacity and support the decking (figure I-4).²² The Z-beam, C-beam, L-beam, and step beam are commonly used in boltless steel shelving.

²¹ 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.

²² 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 these investigations 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).²³ 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.²⁴

Boltless steel shelving units frequently include 3–6 levels of decking in the package.²⁵ Popular decking materials are particle board, laminated boards, and steel wire.²⁶ 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.²⁷ 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.²⁸ 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).²⁹

²³ 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.

²⁴ 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.

²⁵ Conference transcript, p. 17 (White).

²⁶ Edsal does not manufacture either the decking or packaging. Rather, particle board, laminated board, and steel wire decking, along with cardboard packaging, are sourced from either domestic or foreign suppliers. Edsal's prehearing brief, p. 52; exh. 3: Declaration of Chris Kruger, p. 8.

²⁷ 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.

²⁸ Moreover, commonly available finishes for boltless steel shelving are limited to black, red, gray, or silver. Conference transcript, p. 17 (White).

²⁹ Conference transcript, pp. 17–18 (White).

Manufacturing processes³⁰

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.³¹ Slitting is performed either in-house by the producer, a steel service center, or another third-party processor.³² 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.³³ Phosphating reacts with the steel surface to form iron phosphate, both to enhance surface corrosion resistance and to

³⁰ Unless otherwise noted, this information is based on preliminary publication, pp. I-13 – I-14.

³¹ 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 in 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).

³² The petitioner purchases hot-rolled carbon steel in coils, that is neither pre-coated nor pre-fabricated, from ***. Staff field visit notes, February 27, 2024, p. 2.

³³ 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.

provide a stronger bonding surface for the subsequent painting or other coating applications.³⁴ 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.³⁵ According to one of its hearing witnesses, Edsal can provide all the types of boltless steel shelving manufactured by the subject foreign producers.³⁶

Domestic like product issues

No issues with respect to domestic like product have been raised in these investigations. In the preliminary phase of these investigations, the Commission defined a single domestic like product, coextensive with the scope.³⁷ In the final phase of these investigations, no party argued for a different definition or requested that the Commission collect data concerning analysis of the domestic like product definition in their comments on the Commission's draft questionnaires.

³⁴ Boltless steel shelving is commonly available with black, red, gray, or silver finishes. Conference transcript, p. 17 (White).

³⁵ 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.

³⁶ Hearing transcript, p. 22 (Kruger).

³⁷ In the preliminary phase of the investigations, the petitioner proposed that the Commission define the domestic like product to be coextensive with the scope. No respondent party took a position with respect to the proposed definition of the domestic like product in the preliminary phase. Preliminary publication, p. I-14.

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, Menards Sam's Club, and Walmart and is also sold via online retailers like Amazon.com, HomeDepot.com, Lowe's.com, and other hardware stores like Granger and Ace Hardware.¹

Both U.S. producers, 10 of 12 importers, and all 12 purchasers indicated that the boltless steel shelving market was not subject to distinctive conditions of competition.

Apparent U.S. consumption of boltless steel shelving decreased during January 2020 - September 2023. Overall, apparent U.S. consumption in 2022 was *** percent lower than in 2020.

U.S. purchasers

The Commission received 12 usable questionnaire responses from firms that had purchased boltless steel shelving during January 2020 - September 2023.^{2 3 4} Ten responding purchasers are retailers and three are distributors.⁵ In general, responding U.S. purchasers had a presence distributed throughout the continental United States. The responding purchasers mostly represented firms in the retail, warehouse goods, and home improvement goods industries. Large purchasers of boltless steel shelving include Menards, Costco, and Walmart.

¹ Boltless steel shelving conference transcript, p. 19 (White).

² The following firms provided purchaser questionnaire responses: ***.

³ Of the 12 responding purchasers, 10 purchased the domestic boltless steel shelving, 4 purchased imports of the subject merchandise from Malaysia, 3 purchased imports from Taiwan, 4 purchased imports from Thailand, 7 purchased imports from Vietnam, and 8 purchased imports of boltless steel shelving from other sources.

⁴ Eight purchasers indicated they had marketing/pricing knowledge of domestic product, 5 of product from Malaysia, one of product from Taiwan, 4 of product from Thailand, 6 of product from Vietnam, and 5 of nonsubject countries.

⁵ Purchaser *** identified as both a distributor and a retailer.

Impact of section 232 and 301 tariffs

U.S. producers, importers, and purchasers were asked if the tariffs or changes in tariffs concerning steel products under section 232 or on Chinese-origin products under section 301 had an impact on the boltless steel shelving market in the United States. With respect to the section 232 tariffs, *** U.S. producers reported that they had, while the majority of importers reported that they did not know, and a third of importers reported that the tariffs had not had an impact on the boltless steel shelving market. Three-fourths of purchasers reported that they did not know. U.S. producers reported that the tariffs increased raw material costs; U.S. producer *** reported that it was only able to pass partial increases on to its customers due to import competition. Importers reported an increase in cost and pricing after the imposition of the section 232 tariffs. With respect to the section 301 tariffs, half of importers reported that the tariffs had an impact on the boltless steel shelving market, while equal numbers of purchasers reported that they had or that they did not know (table II-1). Importers reported that there had been an increase in costs and prices, and that manufacturers moved production to other countries to avoid the tariffs. Purchaser *** reported that demand decreased due to higher retail prices. Purchasers also reported that the relative price of boltless steel shelving produced in China became higher as a result, and that suppliers were forced to find alternate countries to manufacture in.

Table II-1

Boltless steel shelving: Count of firms' responses regarding the impact of the 232 tariffs on steel and 301 tariffs on Chinese origin products

Tariff type	Firm type	Yes	No	Don't know
232 tariffs	U.S. producers	***	***	***
232 tariffs	Importers	2	4	6
232 tariffs	Purchasers	2	1	9
301 tariffs	U.S. producers	***	***	***
301 tariffs	Importers	6	3	3
301 tariffs	Purchasers	5	1	5

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

Channels of distribution

U.S. producers and importers of subject boltless steel shelving sold *** to retailers, as shown in table II-2.⁶

Table II-2
Boltless steel shelving: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent

Source	Channel	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
United States	Distributors	***	***	***	***	***
United States	End users	***	***	***	***	***
United States	Retailers	***	***	***	***	***
Malaysia	Distributors	***	***	***	***	***
Malaysia	End users	***	***	***	***	***
Malaysia	Retailers	***	***	***	***	***
Taiwan	Distributors	***	***	***	***	***
Taiwan	End users	***	***	***	***	***
Taiwan	Retailers	***	***	***	***	***
Thailand, subject	Distributors	***	***	***	***	***
Thailand, subject	End users	***	***	***	***	***
Thailand, subject	Retailers	***	***	***	***	***
Vietnam	Distributors	***	***	***	***	***
Vietnam	End users	***	***	***	***	***
Vietnam	Retailers	***	***	***	***	***
Subject sources	Distributors	***	***	***	***	***
Subject sources	End users	***	***	***	***	***
Subject sources	Retailers	***	***	***	***	***

Table continued on next page.

⁶ For example, importer ***, which reported that it sold *** to retailers, reported that ***. Industry representative, email message to USITC staff, March 11, 2024. For the purposes of channels of distribution, importers were instructed to report shipments representing a firm's use of imports to stock its retail locations as "to retailers".

Table II-2--Continued**Boltless steel shelving: Share of U.S. shipments by source, channel of distribution, and period**

Shares in percent

Source	Channel	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
India	Distributors	***	***	***	***	***
India	End users	***	***	***	***	***
India	Retailers	***	***	***	***	***
Thailand, nonsubject	Distributors	***	***	***	***	***
Thailand, nonsubject	End users	***	***	***	***	***
Thailand, nonsubject	Retailers	***	***	***	***	***
All other sources	Distributors	***	***	***	***	***
All other sources	End users	***	***	***	***	***
All other sources	Retailers	***	***	***	***	***
Nonsubject sources	Distributors	***	***	***	***	***
Nonsubject sources	End users	***	***	***	***	***
Nonsubject sources	Retailers	***	***	***	***	***
All imports sources	Distributors	***	***	***	***	***
All imports sources	End users	***	***	***	***	***
All imports sources	Retailers	***	***	***	***	***

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 "---".

Note: "Thailand, nonsubject" refers to imports from Siam Metal Tech Co., Ltd., ("Siam Metal") which was assigned a *de minimis* margin by Commerce in its final determination regarding Thailand, while "Thailand, subject" refers to all other imports of boltless steel shelving from Thailand. *** submitted supplemental information to its importers' questionnaire with certain data specific to Siam Metal. Data for "Thailand, subject" subtracts out this data. Staff made minor adjustments to *** U.S. shipment value data, and ending inventories in January-June 2023, to resolve discrepancies between *** initial overall response and its Siam Metal-specific response.

Geographic distribution

U.S. producers reported selling boltless steel shelving to all regions in the contiguous United States (table II-3). U.S. producer *** reported that approximately *** of its demand is from the Northeast corridor.⁷ Except for two importers, most importers reported selling boltless steel shelving to all regions in the contiguous United States.⁸ 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-3
Boltless steel shelving: Count of U.S. producers' and U.S. importers' geographic markets

Region	U.S. producers	Malaysia	Taiwan	Thailand, subject	Vietnam	Subject sources
Northeast	***	4	3	3	4	7
Midwest	***	4	3	3	4	7
Southeast	***	4	3	3	4	7
Central Southwest	***	4	3	3	5	7
Mountain	***	4	3	3	4	7
Pacific Coast	***	6	3	3	6	9
Other	***	3	3	2	5	7
All regions (except Other)	***	4	3	3	4	7
Reporting firms	***	6	3	3	6	9

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

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

⁷ ***.

⁸ Importers *** and ***, only reported selling to the Pacific Coast region.

Supply and demand considerations

U.S. supply

Table II-4 provides a summary of the supply factors regarding boltless steel shelving from U.S. producers and from subject countries. Domestic capacity was *** subject source capacity in 2022.

Table II-4
Boltless steel shelving: Supply factors that affect the ability to increase shipments to the U.S. market, by source

Quantity in units; ratio and share in percent

Factor	Measure	United States	Thailand, subject	Vietnam	Subject sources
Capacity 2020	Quantity	***	***	***	***
Capacity 2022	Quantity	***	***	***	***
Capacity utilization 2020	Ratio	***	***	***	***
Capacity utilization 2022	Ratio	***	***	***	***
Inventories to production 2020	Ratio	***	***	***	***
Inventories to production 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 less than half of U.S. imports of boltless steel shelving from Thailand and less than half of imports from Vietnam during 2022. No foreign producer questionnaire responses were received from producers in Malaysia or Taiwan. During the preliminary investigations, responding foreign producer/exporter firms accounted for all imports from Taiwan 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.”

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 are the availability of unused capacity and the existence of some inventories.

Domestic capacity decreased by *** percent between 2020 and 2022 while capacity utilization decreased by *** percentage points. Major export markets include ***. Other products that producers reportedly can produce on the same equipment as boltless steel shelving are other types of shelving and racks, steel cabinets, storage cabinets, shop equipment, bookcases, and other types of storage.

Subject imports from Malaysia

The Commission issued foreign producers' or exporters' questionnaires to two firms believed to produce and/or export boltless steel shelving from Malaysia, but did not receive any questionnaire responses.⁹ Therefore, information on Malaysian capacity is not directly available. However, reported imports of subject boltless steel shelving from Malaysia increased by *** percent from 2020 to 2022 before decreasing by *** percent between 2022 and 2023. This information indicates that producers of subject boltless steel shelving in Malaysia may be able to respond to changes in price with moderate to large changes in supply.

Subject imports from Taiwan

The Commission issued foreign producers' or exporters' questionnaires to one firm believed to produce and/or export subject boltless steel shelving from Taiwan, but received no questionnaire responses from foreign producers or exporters of subject boltless steel shelving in Taiwan. Therefore, information on capacity in Taiwan is not directly available. However, reported imports of subject boltless steel shelving from Taiwan decreased by *** percent between 2020 and 2022. This information indicates that producers of subject boltless steel shelving in Taiwan may be able to respond to changes in price with small changes in supply.

Subject imports from Thailand

Based on limited available information, the producer of boltless steel shelving from Thailand has the ability to respond to changes in demand with small changes in the quantity of

⁹ For additional information, please see Part VII.

shipments of boltless steel shelving to the U.S. market.¹⁰ The main contributing factors to this degree of responsiveness of supply are *** unused capacity or inventories, inability to shift production to or from alternate products, and small relative capacity.

The responding foreign producer of boltless steel shelving in Thailand did not report any other products that can be produced on the same equipment as boltless steel shelving or factors affecting foreign producers' ability to shift production.

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 moderate 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. Factors mitigating responsiveness of supply include small relative capacity.

Capacity utilization in Vietnam decreased by *** percentage points between 2020 and 2022 despite capacity ***. Responding foreign producers of boltless steel shelving in Vietnam *** products that can be produced on the same equipment as boltless steel shelving. Factors affecting foreign producers' ability to shift production include the high cost of retooling the factory machinery and the limitations from the machinery.

Imports from nonsubject sources

Reported imports from nonsubject sources accounted for *** of reported U.S. imports in 2022.¹¹ The largest sources of nonsubject imports during January 2020 - September 2023 were China, Mexico, and Slovakia.¹²

Supply constraints

Both U.S. producers and most *** importers reported that they had not refused, declined, or been unable to supply boltless steel shelving since January 1, 2020. One importer/purchaser, ***, reported delayed shipments during 2020-22, which it

¹⁰ The responding foreign producer of boltless steel shelving in Thailand ***.

¹¹ For more information, please see Part IV.

¹² However, Petitioner asserts that entries into the U.S. under HTS number 9403.20.0075 from Canada, China, Mexico, and South Korea, which combined, account for 87.0 percent of nonsubject imports reported in official import statistics, are misclassified. See Petition, pp. 12-13. For more information, see part IV.

attributed to pandemic-related supply chain issues, while another, ***, reported that certain vendors were unable to supply its unit demands in 2020 and 2021, which was not fully corrected until the start of 2022, and the third, *** reported that there was increased demand during April 2020-22 and that it could not get contacts for U.S. suppliers.

Half of responding purchasers (6 of 12) reported supply constraints before the petition was filed, while almost all (11 of 12) did not report supply constraints after the petition was filed. Purchaser *** reported that service levels decreased during the pandemic due to supply chain constraints and purchaser *** reported that its inventories were lower than usual during April 2020 – June 2022 and that Edsal was unable to deliver the quantities it requested within regular agreed-upon lead times. No purchasers reported supply constraints from particular imported sources, although importer *** reported that freight costs rose and ocean freight capacity was limited during the COVID-19 pandemic.

New suppliers

Only one of 12 purchasers indicated that new suppliers entered the U.S. market since January 1, 2020. Purchaser *** cited that AR Shelving had entered the market.

U.S. demand

Based on available information, the overall demand for boltless steel shelving is likely to experience moderate changes in response to changes in price. The main contributing factor is the somewhat limited range of substitute products.

End uses and cost share

Reported end uses for boltless steel shelving include homeowner and business use, garage shelving, industrial storage, headphone speaker retail display, and workshops. Boltless steel shelving accounts for a small cost share of these end uses; reported cost shares were about 10 to 20 percent.

Business cycles

Neither U.S. producer, half (6 of 12) responding importers, and 5 of 12 purchasers indicated that the market was subject to business cycles. Specifically, three importers reported that spring (“spring cleaning”) and two importers reported that the fourth quarter of the year in winter (New Year organization), were seasons of higher demand or better sales. One importer/purchaser, ***, reported that sales increased during COVID-19, but declined since the economy weakened and prices increased.

Demand trends

Most firms reported that both U.S. demand and foreign demand for boltless steel shelving had fluctuated down or steadily decreased since January 1, 2020 (table II-5).

Table II-5

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
Domestic demand	U.S. producers	***	***	***	***	***
Domestic demand	Importers	1	4	0	6	3
Domestic demand	Purchasers	0	4	2	6	1
Foreign demand	U.S. producers	***	***	***	***	***
Foreign demand	Importers	0	0	1	1	2
Foreign demand	Purchasers	0	0	2	3	1

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

Petitioner Edsal's CEO stated that there was a decline in demand between 2020 and 2022 which it attributed to "a significant increase in demand for boltless steel shelving that was driven by people staying at home", "straightening up their garages, organizing their basements, {and} taking on projects that they didn't otherwise have" starting in late 2021/early 2022, and that "the decline in demand was not necessarily systemic, but a drop-off from a significant peak".¹³

Substitute products

Substitutes for boltless steel shelving are limited. Neither responding U.S. producer and most importers (8 of 12) and purchasers (7 of 12) reported that there were no substitutes. Petitioner Edsal stated "that there are no real substitutes for boltless steel shelving".¹⁴ The few substitutes reported by importers and purchasers included other types of shelving (bolted steel, bulk, plastic, wall-mounted, and wire shelving) and pallet racks.

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

¹³ Hearing transcript, p. 34 (White).

¹⁴ Hearing transcript, p. 22 (Kruger).

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.¹⁵ Factors contributing to this level of substitutability include similar reported quality across subject sources, similar quality and availability for boltless steel shelving, little preference for particular country of origin or producers, similarities between domestically produced boltless steel shelving and boltless steel shelving imported from subject countries across multiple purchase factors, and interchangeability between domestic and subject sources. Three of 12 responding purchasers reported that they were aware of product recalls, and 2 of 12 responding purchasers reported that they had been impacted by product recalls. Factors reducing substitutability include different lead times from domestic and subject sources.

Factors affecting purchasing decisions

Purchaser decisions based on source

As shown in table II-6, half of purchasers never make purchasing decisions based on the producer or country of origin, while most of their customers never make purchasing decisions based on the producer, and the majority of their customers sometimes make purchasing decisions based on country of origin. Of the three purchasers that reported that they always make decisions based on the manufacturer, four firms cited product quality; other reasons cited include reputation for financial stability, lead time, on-time delivery, and vendor relations.

Table II-6
Boltless steel shelving: Count of purchasers' responses regarding frequency of purchasing decisions based on producer and country of origin

Firm making decision	Decision based on	Always	Usually	Sometimes	Never
Purchaser	Producer	3	1	2	6
Customer	Producer	0	0	3	7
Purchaser	Country	1	2	3	6
Customer	Country	0	0	6	4

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

¹⁵ 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.).

Importance of purchasing domestic product

Ten of 12 purchasers reported that most or all of their purchases did not require purchasing U.S.-produced product. None reported that domestic product was required by law, two reported it was required by their customers (for 1 to 5 percent of their purchases), and one *** reported other preferences for domestic product, for which it cited its current supplier not having import options.

Most important purchase factors

The most often cited top three factors firms consider in their purchasing decisions for boltless steel shelving were price and quality (10 firms each) and availability/supply (5 firms), as shown in table II-7. Quality was the most frequently cited first-most important factor (cited by 8 firms), followed by availability/supply (2 firms); price/cost was the most frequently reported second-most and third-most important factor (7 and 3 firms, respectively).

Table II-7

Boltless steel shelving: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Factor	First	Second	Third	Total
Price / Cost	0	7	3	10
Quality	8	1	1	10
Availability / Supply	2	1	2	5
Product line / Range	0	0	1	1
Supplier stability / Vendor reliability	0	0	2	2
All other factors	1	2	2	NA

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

Note: Other factors include capacity, consumer preferences, product safety, product specifications, and value.

A plurality of purchasers (6 of 12) reported that they sometimes purchase the lowest-priced product, while 4 reported that they never do and 2 reported that they usually do.

Importance of specified purchase factors

Purchasers were asked to rate the importance of 16 factors in their purchasing decisions (table II-8). The factors rated as very important by more than half of responding purchasers were safety (reported by 12 purchasers), availability (11 purchasers), price, product consistency, quality meets industry standards, and reliability of supply (10 purchasers each), delivery time (9 purchasers), and delivery terms (7 purchasers).

Table II-8

Boltless steel shelving: Count of purchasers' responses regarding importance of purchase factors, by factor

Factor	Very important	Somewhat important	Not important
Availability	11	1	0
Delivery terms	7	5	0
Delivery time	9	3	0
Discounts offered	3	8	1
Minimum quantity requirements	2	8	2
Packaging	5	7	0
Payment terms	5	6	1
Price	10	2	0
Product consistency	10	2	0
Product range	2	10	0
Quality meets industry standards	10	2	0
Quality exceeds industry standards	5	6	1
Reliability of supply	10	1	1
Safety	12	0	0
Technical support/service	3	6	3
U.S. transportation costs	6	4	2

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

Lead times

Boltless steel shelving is primarily sold from inventory. U.S. producers reported that *** percent of their commercial shipments in 2022 were from inventories, with lead times averaging *** days. The remaining *** percent of their commercial shipments were produced to order, with lead times averaging *** days. U.S. importers reported that *** percent of their commercial shipments in 2022 were from U.S. inventories, with lead times of *** days, while the remaining *** percent of commercial shipments were produced to order, with lead times averaging *** days.

Supplier certification

Half of responding purchasers (6 of 12) require their suppliers to become certified or qualified to sell boltless steel shelving to their firm. Purchasers reported that the time to qualify a new supplier ranged from 7 to 124 days. No purchasers reported that any domestic or foreign suppliers had failed in its attempt to qualify boltless steel shelving or had lost its approved status since 2020.

Minimum quality specifications

As can be seen from table II-9, one-third of purchasers reported that domestically produced product always met minimum quality specifications, while another third reported that they usually did. Most responding purchasers reported that they did not know whether or not boltless steel shelving from subject sources met minimum quality specifications.

Table II-9

Boltless steel shelving: Count of purchasers' responses regarding suppliers' ability to meet minimum quality specifications, by source

Source of purchases	Always	Usually	Sometimes	Rarely or never	Don't Know
United States	4	4	1	0	3
Malaysia	2	2	0	0	7
Taiwan	3	0	0	0	9
Thailand, subject	1	2	0	0	7
Vietnam	1	3	1	0	5
India	1	0	0	0	10
All other sources	3	2	1	0	5

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

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

Seven purchasers cited load/weight capacity as a quality characteristic, while five cited appearance, finish, or lack of visible imperfections. Other quality characteristics included ease of assembly/installation, hole-punch alignments, return rates, steel grades, testing performance, value, welds, and adherence to applicable U.S. laws.

Changes in purchasing patterns

Eight of 12 purchasers reported that they had changed suppliers since January 1, 2020, while four reported that they had not. Specifically, importer/purchaser *** switched from Shin Ye to Hoifat due to lower cost, comparable quality, and because Hoifat could produce *** in-house. Firms added or increased purchases from Shincrest, AR Shelving, and LL&T International were added to serve as secondary suppliers to improve product selection. Purchasers also reported general changes due to cost, performance, quality, and sales.

Purchasers were also asked about changes in their purchasing patterns from different countries since January 1, 2020 (table II-10). Purchasers reported that purchases of U.S.-produced boltless steel shelving fluctuated downwards because of customer demand (cited by two purchasers), concerns around quality due to Edsal's 2021 product recall (cited by one purchaser), and downward market sales trends since the pandemic (cited by one purchaser).

Table II-10

Boltless steel shelving: Count of purchasers' responses regarding changes in purchase patterns from U.S., subject, and nonsubject countries

Source of purchases	Steadily Increase	Fluctuate Up	No change	Fluctuate Down	Steadily decrease	Did not purchase
United States	0	3	0	5	2	3
Malaysia	2	2	0	2	0	7
Taiwan	0	1	1	0	0	10
Thailand	1	1	1	1	0	8
Vietnam	1	1	2	1	0	7
India	1	0	0	0	0	11
All other sources	2	1	1	1	3	4
Sources unknown	0	0	0	1	0	10

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

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

Purchasers were asked a number of questions comparing boltless steel shelving produced in the United States, subject countries, and nonsubject countries. Purchasers were asked for a country-by-country comparison on the same 16 factors (table II-11) for which they were asked to rate the importance.

Most purchasers reported that U.S.-produced boltless steel shelving was superior or comparable to product from all sources, for all factors with the exception of:

- Price: most purchasers reported that U.S.-produced boltless steel shelving was inferior to product produced in Malaysia and Thailand, while one purchaser each reported that it was either comparable or inferior to product produced in Taiwan and two purchasers each reported that it was either superior or inferior to product produced in Vietnam;
- Availability: two purchasers each reported that it was either comparable or inferior to product produced in Vietnam;
- Delivery time: two purchasers reported that it was inferior to product produced in Malaysia; and,
- Safety and reliability of supply: one purchaser each reported that it was inferior to product produced in Taiwan.

Price was the only factor across all sources for which at least one purchaser ranked domestic product as inferior. All responding purchasers reported that boltless steel shelving across all sources was at least comparable on quality meets industry standards and quality exceeds industry standards, which were cited by firms to be “Very Important”.

Table II-11**Boltless steel shelving: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Malaysia	0	4	0
Delivery terms	U.S. vs Malaysia	0	4	0
Delivery time	U.S. vs Malaysia	1	1	2
Discounts offered	U.S. vs Malaysia	1	3	0
Minimum quantity requirements	U.S. vs Malaysia	1	3	0
Packaging	U.S. vs Malaysia	0	4	0
Payment terms	U.S. vs Malaysia	0	3	1
Price	U.S. vs Malaysia	0	1	4
Product consistency	U.S. vs Malaysia	0	3	1
Product range	U.S. vs Malaysia	0	4	0
Quality meets industry standards	U.S. vs Malaysia	0	4	0
Quality exceeds industry standards	U.S. vs Malaysia	0	4	0
Reliability of supply	U.S. vs Malaysia	0	4	0
Safety	U.S. vs Malaysia	0	4	0
Technical support/service	U.S. vs Malaysia	0	4	0
U.S. transportation costs	U.S. vs Malaysia	0	5	0

Table continued.

Table II-11--Continued**Boltless steel shelving: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Taiwan	0	2	0
Delivery terms	U.S. vs Taiwan	0	2	0
Delivery time	U.S. vs Taiwan	0	2	0
Discounts offered	U.S. vs Taiwan	0	2	0
Minimum quantity requirements	U.S. vs Taiwan	0	2	0
Packaging	U.S. vs Taiwan	0	2	0
Payment terms	U.S. vs Taiwan	0	2	0
Price	U.S. vs Taiwan	0	1	1
Product consistency	U.S. vs Taiwan	0	2	0
Product range	U.S. vs Taiwan	0	2	0
Quality meets industry standards	U.S. vs Taiwan	0	2	0
Quality exceeds industry standards	U.S. vs Taiwan	0	1	0
Reliability of supply	U.S. vs Taiwan	0	0	1
Safety	U.S. vs Taiwan	0	0	1
Technical support/service	U.S. vs Taiwan	0	1	0
U.S. transportation costs	U.S. vs Taiwan	0	2	0

Table continued.

Table II-11--Continued**Boltless steel shelving: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Thailand	0	3	1
Delivery terms	U.S. vs Thailand	0	4	0
Delivery time	U.S. vs Thailand	2	2	0
Discounts offered	U.S. vs Thailand	0	4	0
Minimum quantity requirements	U.S. vs Thailand	1	3	0
Packaging	U.S. vs Thailand	0	3	1
Payment terms	U.S. vs Thailand	0	4	0
Price	U.S. vs Thailand	0	1	4
Product consistency	U.S. vs Thailand	1	3	0
Product range	U.S. vs Thailand	1	3	0
Quality meets industry standards	U.S. vs Thailand	1	3	0
Quality exceeds industry standards	U.S. vs Thailand	1	3	0
Reliability of supply	U.S. vs Thailand	0	4	0
Safety	U.S. vs Thailand	1	2	1
Technical support/service	U.S. vs Thailand	0	4	0
U.S. transportation costs	U.S. vs Thailand	0	4	0

Table continued.

Table II-11--Continued**Boltless steel shelving: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Vietnam	0	2	2
Delivery terms	U.S. vs Vietnam	0	4	0
Delivery time	U.S. vs Vietnam	2	2	0
Discounts offered	U.S. vs Vietnam	0	4	0
Minimum quantity requirements	U.S. vs Vietnam	0	4	0
Packaging	U.S. vs Vietnam	0	3	1
Payment terms	U.S. vs Vietnam	0	4	0
Price	U.S. vs Vietnam	2	1	2
Product consistency	U.S. vs Vietnam	0	4	0
Product range	U.S. vs Vietnam	0	4	0
Quality meets industry standards	U.S. vs Vietnam	0	4	0
Quality exceeds industry standards	U.S. vs Vietnam	0	4	0
Reliability of supply	U.S. vs Vietnam	0	4	0
Safety	U.S. vs Vietnam	0	4	0
Technical support/service	U.S. vs Vietnam	0	4	0
U.S. transportation costs	U.S. vs Vietnam	0	3	1

Table continued.

Table II-11--Continued**boltless steel shelving: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs All other sources	1	4	0
Delivery terms	U.S. vs All other sources	1	4	0
Delivery time	U.S. vs All other sources	1	4	0
Discounts offered	U.S. vs All other sources	0	5	0
Minimum quantity requirements	U.S. vs All other sources	1	4	0
Packaging	U.S. vs All other sources	0	5	0
Payment terms	U.S. vs All other sources	0	5	0
Price	U.S. vs All other sources	1	3	1
Product consistency	U.S. vs All other sources	0	5	0
Product range	U.S. vs All other sources	0	5	0
Quality meets industry standards	U.S. vs All other sources	0	5	0
Quality exceeds industry standards	U.S. vs All other sources	0	5	0
Reliability of supply	U.S. vs All other sources	1	4	0
Safety	U.S. vs All other sources	0	4	0
Technical support/service	U.S. vs All other sources	0	4	0
U.S. transportation costs	U.S. vs All other sources	1	4	0

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

Note: With respect to price and cost, a rating of superior means that price/U.S. transportation cost is generally lower. For example, if a firm reported "U.S. superior," it meant that the U.S. product was generally priced lower than the imported product. Purchasers were also asked to compare imported product between subject sources; however, no more than two responding purchasers were familiar with the subject country comparisons.

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, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables II-12 to II-14, only half of purchasers reported knowledge regarding interchangeability; however, responding purchasers reported that products can always or frequently be used interchangeably. Purchaser *** reported that interchangeability is based on the customer's application of the product and their need to match the specifications from existing products.

Table II-12

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
United States vs. India	2	0	0	0
United States vs. Malaysia	2	0	0	0
United States vs. Taiwan	2	0	0	0
United States vs. Thailand	2	0	0	0
United States vs. Vietnam	2	0	0	0
India vs. Malaysia	2	0	0	0
India vs. Taiwan	2	0	0	0
India vs. Thailand	2	0	0	0
India vs. Vietnam	2	0	0	0
Malaysia vs. Taiwan	2	0	0	0
Malaysia vs. Thailand	2	0	0	0
Malaysia vs. Vietnam	2	0	0	0
Taiwan vs. Thailand	2	0	0	0
Taiwan vs. Vietnam	2	0	0	0
Thailand vs. Vietnam	2	0	0	0
United States vs. Other	2	0	0	0
India vs. Other	2	0	0	0
Malaysia vs. Other	2	0	0	0
Taiwan vs. Other	2	0	0	0
Thailand vs. Other	2	0	0	0
Vietnam vs. Other	2	0	0	0

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

Table II-13

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
United States vs. India	3	0	0	0
United States vs. Malaysia	3	3	0	0
United States vs. Taiwan	3	1	0	0
United States vs. Thailand	2	2	0	0
United States vs. Vietnam	3	3	0	0
India vs. Malaysia	3	0	0	0
India vs. Taiwan	3	0	0	0
India vs. Thailand	2	0	0	0
India vs. Vietnam	2	0	0	0
Malaysia vs. Taiwan	3	0	0	0
Malaysia vs. Thailand	2	0	0	0
Malaysia vs. Vietnam	2	1	0	0
Taiwan vs. Thailand	2	1	0	0
Taiwan vs. Vietnam	2	1	0	0
Thailand vs. Vietnam	2	2	0	0
United States vs. Other	4	1	0	0
Malaysia vs. Other	2	1	0	0
Taiwan vs. Other	2	0	0	0
Thailand vs. Other	2	0	0	0
Vietnam vs. Other	2	1	0	0

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

Table II-14

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

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

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

In addition, U.S. producers, importers, and purchasers 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-15 to II-17, U.S. producers reported that differences other than price were never significant, while responses varied amongst importers and purchasers. Three purchasers cited quality in discussing the significance of differences other than price, in addition to the ability to pass testing and safety. Two purchasers reported that if quality did not meet standards, then the price would not have made a difference.

Table II-15

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
United States vs. India	0	0	0	2
United States vs. Malaysia	0	0	0	2
United States vs. Taiwan	0	0	0	2
United States vs. Thailand	0	0	0	2
United States vs. Vietnam	0	0	0	2
India vs. Malaysia	0	0	0	2
India vs. Taiwan	0	0	0	2
India vs. Thailand	0	0	0	2
India vs. Vietnam	0	0	0	2
Malaysia vs. Taiwan	0	0	0	2
Malaysia vs. Thailand	0	0	0	2
Malaysia vs. Vietnam	0	0	0	2
Taiwan vs. Thailand	0	0	0	2
Taiwan vs. Vietnam	0	0	0	2
Thailand vs. Vietnam	0	0	0	2
United States vs. Other	0	0	0	2
Malaysia vs. Other	0	0	0	2
Taiwan vs. Other	0	0	0	2
Thailand vs. Other	0	0	0	2
Vietnam vs. Other	0	0	0	2

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

Table II-16

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
United States vs. India	0	0	2	1
United States vs. Malaysia	1	0	3	2
United States vs. Taiwan	0	0	3	1
United States vs. Thailand	0	1	2	1
United States vs. Vietnam	1	1	2	2
India vs. Malaysia	0	0	1	1
India vs. Taiwan	0	0	2	1
India vs. Thailand	0	0	1	1
India vs. Vietnam	0	0	1	1
Malaysia vs. Taiwan	0	1	1	1
Malaysia vs. Thailand	0	0	1	1
Malaysia vs. Vietnam	0	1	1	1
Taiwan vs. Thailand	0	0	2	1
Taiwan vs. Vietnam	0	0	2	1
Thailand vs. Vietnam	0	1	2	1
United States vs. Other	0	0	3	2
Malaysia vs. Other	0	1	1	1
Taiwan vs. Other	0	0	1	1
Thailand vs. Other	0	0	1	1
Vietnam vs. Other	0	1	1	2

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

Table II-17

Boltless steel shelving: Count of purchasers 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
United States vs. India	0	0	1	0
United States vs. Malaysia	2	1	2	0
United States vs. Taiwan	0	1	2	1
United States vs. Thailand	1	2	2	0
United States vs. Vietnam	0	3	3	0
India vs. Malaysia	0	0	0	0
India vs. Taiwan	0	0	1	0
India vs. Thailand	0	0	0	0
India vs. Vietnam	0	0	0	0
Malaysia vs. Taiwan	0	0	0	0
Malaysia vs. Thailand	1	0	1	0
Malaysia vs. Vietnam	0	2	0	0
Taiwan vs. Thailand	0	0	1	0
Taiwan vs. Vietnam	0	0	1	0
Thailand vs. Vietnam	0	2	2	0
United States vs. Other	1	2	3	2
Malaysia vs. Other	1	2	0	0
Taiwan vs. Other	0	1	0	0
Thailand vs. Other	1	1	1	0
Vietnam vs. Other	0	2	2	0

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

Elasticity estimates

This section discusses elasticity estimates; parties were encouraged to comment on these estimates as an attachment to their prehearing or posthearing brief. Petitioner Edsal stated that “the record again supports a moderate-to-high degree of substitutability at this final stage.”¹⁶ Edsal’s counsel also stated that “in all of our understanding of the market and the information that we’ve relied on suggests a very high degree of substitutability, not moderate.”¹⁷

U.S. supply elasticity

The domestic supply elasticity for boltless steel shelving measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of boltless steel shelving. The elasticity of domestic supply depends on several factors including the level of

¹⁶ Petitioner Edsal’s prehearing brief, p. 19.

¹⁷ Hearing transcript, p. 84 (Cannon).

excess capacity, the ease with which producers can alter capacity, producers' ability to shift to production of other products, the existence of inventories, and the availability of alternate markets for U.S.-produced boltless steel shelving. Analysis of these factors above indicates that the U.S. industry has the ability to greatly increase or decrease shipments to the U.S. market; an estimate in the range of 8 to 10 is suggested.

U.S. demand elasticity

The U.S. demand elasticity for boltless steel shelving measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of boltless steel shelving. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the boltless steel shelving in the production of any downstream products. Based on the available information, the aggregate demand for boltless steel shelving is likely to be moderately inelastic; a range of -0.5 to -1.0 is suggested.

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.¹⁸ Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). Based on available information, the elasticity of substitution between U.S.-produced boltless steel shelving and imported boltless steel shelving is likely to be in the range of 3 to 7. Factors contributing to this level of substitutability include similar reported quality across subject sources, similar quality and availability for boltless steel shelving, little preference for particular country of origin, similarities between domestically produced boltless steel shelving and boltless steel shelving imported from subject countries across multiple purchase factors, and interchangeability between domestic and subject sources. Three of 12 responding purchasers reported that they were aware of product recalls, and 2 of 12 responding purchasers reported that they had been impacted by product recalls. Factors reducing substitutability include different lead times from domestic and subject sources, and the importance of quality as a factor other than price.

¹⁸ The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the subject imports and the domestic like products to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the subject products (or vice versa) when prices change.

Part III: 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 2022.¹

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

¹ The petitioner, Edsal, is the largest U.S. producer of boltless steel shelving, accounting for *** U.S. production, and it claims that the only other domestic producer is Tennsco Corp. ("Tennsco"). Edsal notes that ***. Petition, p. 2. In the preliminary phase of these investigations, Petitioner's counsel noted that there had 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

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.²

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.

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.

² ***. Staff field trip report, Edsal, February 27, 2024.

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
Corporate planning	Edsal	February 2020— Edsal noted slowing and disruption of shipments of certain specialized shelving components from a major supplier in China shortly after the Lunar New Year holidays (late-January 2020). To maintain its supply chains, Edsal expanded its domestic production in February.
Corporate planning	Edsal	April–June 2020— New orders for Edsal's industrial/non-retail product lines declined almost to zero by April as industrial customers and distributors shuttered their operations during the COVID-19 pandemic. By contrast, its retail business rebounded in April–June, after state and local governments declared in late-March that hardware stores were to remain open as “essential businesses.”
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, ***, the 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.”
Patent dispute	Edsal	June 2023— There is a patent dispute between Edsal and JS Products involving a shelf support beam (i.e., a horizontal component) for a boltless steel shelving product.

Source: Monomoy Capital Partners (“MCP”), “Home Improvement Outlook COVID-19 Edition–Interview with Scott White, CEO of Edsal,” July 7, 2020, <https://www.mcpfunds.com/news/home-improvement-outlook-covid-19-edition-interview-with-scott-white-ceo-of-edsal/>; 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); Jaken nonparty statement, May 19, 2023, p. 5; USITC staff field visit notes, February 27, 2024, p. 2; Casetext, “Edsal Mfg. Co. v. JS Prods.,” March 6, 2024, <https://casetext.com/case/edsal-mfg-co-v-js-prods-3>; and USITC staff email correspondence with Counsel to petitioner, April 19, 2024.

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 its 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, and in January-September ("interim") 2022 and 2023. Practical overall capacity declined by *** percent from 2020-22, and was *** percent lower in interim 2023 than in interim 2022. 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. Installed overall capacity utilization was *** percentage points lower in interim 2023 than in interim 2022, however practical overall capacity utilization was *** percentage points higher in interim 2023 than in interim 2022.

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. Practical capacity to produce boltless steel shelving was *** percent lower in interim 2023 than in interim 2022, however production of boltless steel shelving was *** percent lower in interim 2023 than in interim 2022, resulting in boltless steel shelving capacity utilization being *** percentage points higher in interim 2023 than in interim 2022.³

Table III-5
Boltless steel shelving: U.S. producers' installed and practical capacity and production on the same equipment as in-scope production, by period

Capacity and production in units; utilization in percent

Item	Measure	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical BSS	Capacity	***	***	***	***	***
Practical BSS	Production	***	***	***	***	***
Practical BSS	Utilization	***	***	***	***	***

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

³ From 2020-22, Edsal reported a consistent installed overall capacity of *** units, but declining practical overall capacity of *** units to *** units. 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-6 presents U.S. producers' reported narratives regarding practical capacity constraints.⁴

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	***
Logistics/transportation	***

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

⁴ Edsal reported *** capacity constraints in its questionnaire response. The company further explained that, "****." Email from ***, March 1, 2024. The company additionally noted that it has had no issues procuring raw materials for its production: "We buy almost 100 percent of our steel, which is our primary raw material, from local steel manufacturers, whether that be in Indiana, Michigan, Illinois, or Ohio. That's where the bulk of our capacity comes from, and that has not been an issue in terms of being able to secure raw materials to produce our products." Hearing transcript, pp. 59-60 (White).

Table III-7 and figure III-1 present U.S. producers' production, capacity, and capacity utilization.⁵

Table III-7
Boltless steel shelving: U.S. producers' output, by firm and period

Practical capacity

Capacity in units

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
Edsal	***	***	***	***	***
Tennsco	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

⁵ Edsal provided additional detail on how its product lines constitute the production data it provided to the Commission: "***."

Discussing the sourcing of parts and components used to make boltless steel shelving, Edsal reported that ***, and further that: "***." Email from ***, March 1, 2024. Additionally, Edsal ***. Staff field trip report, Edsal, February 27, 2024.

Table III-7 Continued**Boltless steel shelving: U.S. producers' output, by firm and period****Production**

Production in units

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
Edsal	***	***	***	***	***
Tennsco	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-7 Continued**Boltless steel shelving: U.S. producers' output, by firm and period****Capacity utilization**

Capacity utilization in percent

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
Edsal	***	***	***	***	***
Tennsco	***	***	***	***	***
All firms	***	***	***	***	***

Note: Capacity utilization ratio represents the ratio of the U.S. producer's production to its production capacity.

Table continued.

Table III-7 Continued**Boltless steel shelving: U.S. producers' output, by firm and period****Share of production**

Share in percent

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
Edsal	***	***	***	***	***
Tennsco	***	***	***	***	***
All firms	***	***	***	***	***

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

Figure III-1
Boltless steel shelving: U.S. producers' output, by period

* * * * *

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

Alternative products

As shown in table III-8, *** percent of the products 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, and from interim 2022 to interim 2023 (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) and was *** percent higher in interim 2023 than in interim 2022. 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), and was *** percent lower in interim 2023 than in interim 2022.

Table III-8

Boltless steel shelving: U.S. producers' overall production on the same equipment as in-scope production, by period

Quantity in units; ratio and share in percent

Product type	Measure	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
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. U.S. shipments by quantity were *** percent lower in interim 2023 than in interim 2022, and U.S. shipment unit values were *** percent lower in interim 2023 than in interim 2022. Export shipments by quantity decreased by *** percent from 2020-22 while export shipment unit values increased by *** percent over the same period. Export shipments by quantity were *** percent lower in interim 2023 than in interim 2022, and export shipment unit values were *** percent lower in interim 2023 than in interim 2022. 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' shipments, by destination and period**

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

Item	Measure	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
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. Inventories were *** percent lower in interim 2023 than in interim 2022. As a ratio to U.S. shipments and total shipments, inventories increased by *** percentage points from 2020-22 (though at different beginning and ending period ratios). Inventories as a ratio to U.S. production, U.S. shipments, and total shipments, were all higher in interim 2023 than in interim 2022.

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	Jan-Sep 2022	Jan-Sep 2023
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. This ratio was *** percent in interim 2022 and *** percent in interim 2023. 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	Jan-Sep 2022	Jan-Sep 2023
U.S. production	Quantity	***	***	***	***	***
Imports from Malaysia	Quantity	***	***	***	***	***
Imports from Thailand, subject	Quantity	***	***	***	***	***
Imports from Vietnam	Quantity	***	***	***	***	***
Imports from subject sources	Quantity	***	***	***	***	***
Imports from Malaysia to U.S. production	Ratio	***	***	***	***	***
Imports from Thailand, subject to U.S. production	Ratio	***	***	***	***	***
Imports from Vietnam to U.S. production	Ratio	***	***	***	***	***
Imports from subject sources to U.S. production	Ratio	***	***	***	***	***

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

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

Table III-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, but it was *** percent higher in interim 2023 than in interim 2022. Total hours worked and hours worked per PRW declined by *** percent and *** percent from 2020-22, respectively; total hours worked was *** percent lower in interim 2023 than in interim 2022, while hours worked per PRW were *** percent lower in interim 2023 than in interim 2022. Wages paid declined by *** percent from 2020-22 (but were *** percent higher in interim 2023 than in interim 2022), however hourly wages increased by *** percent from 2020-22 and were *** percent higher in interim 2023 than in interim 2022. Productivity declined by *** percent (and were *** percent lower in interim 2023 than in interim 2022) while unit labor costs increased by *** percent (and were *** percent higher in interim 2023 than in interim 2022).⁶

⁶ Tenssco reported a consistent level of *** PRWs over the period (with *** PRWs in interim 2023). The company explained further in the preliminary phase (which covered data for 2020-22) 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.

The company further explained that ***. Staff field trip report, Edsal, February 27, 2024.

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

Item	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
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.

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

U.S. importers

The Commission issued importer questionnaires to 99 firms believed to be importers of subject boltless steel shelving, as well as to all U.S. producers of boltless steel shelving.¹ Usable questionnaire responses were received from 12 companies, representing *** percent of U.S. imports from the subject countries in 2022 under HTS subheading 9403.20.0075.²

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 2022.³

¹ The Commission issued questionnaires to those firms identified in the petition; staff research; and proprietary, Census-edited Customs' import records.

² Shares by source are provided in Part I. 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 preliminary 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...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 87.0 percent of nonsubject imports reported in official import statistics in 2022, are misclassified. See Petition, pp. 12-13.

In addition to collecting data on boltless steel shelving units imported under HTS statistical reporting number 9403.20.0075, the Commission's importers' questionnaire collected data on boltless steel shelving units imported under HTS statistical reporting numbers other than from 9403.20.0075, and such units are included in tables referencing importers' questionnaire data. The questionnaire also collected data on any products imported under 9403.20.0075 that were not boltless steel shelving. These units are removed from certain tables in this report that reference official import statistics.

³ "Thailand, nonsubject" refers to imports from Siam Metal which was assigned a de minimis margin by Commerce in its final determination regarding Thailand, while "Thailand, subject" refers to all other imports of boltless steel shelving from Thailand. *** submitted supplemental information with certain data specific to Siam Metal. Data for "Thailand, subject" subtracts out these data. From 2020 to interim 2023, *** percent of *** imports from Thailand were from Siam Metal. The share of *** imports from Thailand produced by Siam Metal decreased from a high of *** percent in 2020 to *** percent in interim 2023, which was the lowest share in any period. Staff made minor adjustments to *** U.S. shipment value data, and ending inventories in Jan.-June 2023, to resolve discrepancies between *** initial overall response and its Siam Metal-specific response.

(continued...)

Table IV-1

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

Share in percent

Firm	Headquarters	Malaysia	Taiwan	Thailand, subject	Vietnam	Subject sources
Amazon	Seattle, WA	***	***	***	***	***
Bi-Mart	Eugene, OR	***	***	***	***	***
Costco	Issaquah, WA	***	***	***	***	***
Edsal	Chicago, IL	***	***	***	***	***
Fasteners	Twinsburg, OH	***	***	***	***	***
Global Industrial	Port Washington, NY	***	***	***	***	***
Home Depot	Atlanta, GA	***	***	***	***	***
Jaken	Tustin, CA	***	***	***	***	***
JS Products	Las Vegas, NV	***	***	***	***	***
Lowe's	Mooresville, NC	***	***	***	***	***
Northern Tool	Burnsville, MN	***	***	***	***	***
Walmart	Bentonville, AR	***	***	***	***	***
All firms	Various	100.0	100.0	100.0	100.0	100.0

Table continued.

(...continued)

Eonmetall, which was the only firm in Malaysia preliminarily assigned a de minimis margin by Commerce, was assigned an 81.12 percent dumping margin based on adverse facts available by Commerce in its final determination. Therefore, all imports from Malaysia are treated as subject in this staff report. As reported in Part I, the Commission terminated its investigation with respect to India following Commerce's negative final determination of sales at LTFV with respect to imports from India. As in the prehearing report, imports from India are treated as nonsubject in this staff report.

Table IV-1 Continued**Boltless steel shelving: U.S. importers, their headquarters, and share of imports within each source, 2022**

Share in percent

Firm	Headquarters	India	Thailand, nonsubject	All other sources	Nonsubject sources	All import sources
Amazon	Seattle, WA	***	***	***	***	***
Bi-Mart	Eugene, OR	***	***	***	***	***
Costco	Issaquah, WA	***	***	***	***	***
Edsal	Chicago, IL	***	***	***	***	***
Fasteners	Twinsburg, OH	***	***	***	***	***
Global Industrial	Port Washington, NY	***	***	***	***	***
Home Depot	Atlanta, GA	***	***	***	***	***
Jaken	Tustin, CA	***	***	***	***	***
JS Products	Las Vegas, NV	***	***	***	***	***
Lowe's	Mooresville, NC	***	***	***	***	***
Northern Tool	Burnsville, MN	***	***	***	***	***
Walmart	Bentonville, AR	***	***	***	***	***
All firms	Various	100.0	100.0	100.0	100.0	100.0

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

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

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 59.4 percent from 2020-21, and decreased by 8.5 percent from 2021-22, for an overall increase of 45.9 percent from 2020-22. Imports from subject sources by value increased by 78.6 percent from 2020-22, resulting in an increase in unit values of 22.4 percent in the same period. Imports from subject sources were 60.4 percent lower by quantity in interim 2023 than in interim 2022, and were 47.7 percent lower by value, yet unit values of subject imports were 32.1 percent higher in interim 2023 than in interim 2022. As a share of all imports, imports from subject sources decreased by *** percentage points from 2020-22, and were *** percentage points lower in interim 2023 than in interim 2022.

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. Imports from nonsubject sources were *** percent lower by quantity in interim 2023 than in interim 2022, and were *** percent lower by value in the same period. Unit values of nonsubject imports were *** percent lower in interim 2023 than in interim 2022.

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

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

Source	Measure	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
Malaysia	Quantity	***	***	***	***	***
Taiwan	Quantity	***	***	***	***	***
Thailand, subject	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	1,279,205	2,038,692	1,865,994	1,496,767	593,127
India	Quantity	***	***	***	***	***
Thailand, nonsubject	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
Malaysia	Value	***	***	***	***	***
Taiwan	Value	***	***	***	***	***
Thailand, subject	Value	***	***	***	***	***
Vietnam	Value	***	***	***	***	***
Subject sources	Value	75,751	112,027	135,257	99,559	52,099
India	Value	***	***	***	***	***
Thailand, nonsubject	Value	***	***	***	***	***
All other sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
Malaysia	Unit value	***	***	***	***	***
Taiwan	Unit value	***	***	***	***	***
Thailand, subject	Unit value	***	***	***	***	***
Vietnam	Unit value	***	***	***	***	***
Subject sources	Unit value	59	55	72	67	88
India	Unit value	***	***	***	***	***
Thailand, nonsubject	Unit value	***	***	***	***	***
All other sources	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	***	***	***	***	***

Table continued.

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

Shares and ratios in percent

Source	Measure	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
Malaysia	Share of quantity	***	***	***	***	***
Taiwan	Share of quantity	***	***	***	***	***
Thailand, subject	Share of quantity	***	***	***	***	***
Vietnam	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	***	***	***	***	***
India	Share of quantity	***	***	***	***	***
Thailand, nonsubject	Share of quantity	***	***	***	***	***
All other sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
Malaysia	Share of value	***	***	***	***	***
Taiwan	Share of value	***	***	***	***	***
Thailand, subject	Share of value	***	***	***	***	***
Vietnam	Share of value	***	***	***	***	***
Subject sources	Share of value	***	***	***	***	***
India	Share of value	***	***	***	***	***
Thailand, nonsubject	Share of value	***	***	***	***	***
All other sources	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
Malaysia	Ratio	***	***	***	***	***
Taiwan	Ratio	***	***	***	***	***
Thailand, subject	Ratio	***	***	***	***	***
Vietnam	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
India	Ratio	***	***	***	***	***
Thailand, nonsubject	Ratio	***	***	***	***	***
All other sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". "Thailand, subject" is all merchandise from Thailand minus merchandise supplied by Siam Metal.

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.⁴ As described above from 2020-22, import quantities from subject sources increased by 45.9 percent while imports from nonsubject sources increased by *** percent. Among subject sources, imports from Malaysia, Thailand, and Vietnam increased by *** percent, *** percent, and *** percent, respectively. Imports from Taiwan decreased by *** percent from 2020-22.

⁴ 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	Jan-Sep 2022-23
Malaysia	%Δ Quantity	▲ ***	▲ ***	▲ ***	▼ ***
Taiwan	%Δ Quantity	▼ ***	▲ ***	▼ ***	▼ ***
Thailand, subject	%Δ Quantity	▲ ***	▲ ***	▲ ***	▲ ***
Vietnam	%Δ Quantity	▲ ***	▲ ***	▼ ***	▼ ***
Subject sources	%Δ Quantity	▲ 45.9	▲ 59.4	▼ (8.5)	▼ (60.4)
India	%Δ Quantity	▲ ***	***	▲ ***	▲ ***
Thailand, nonsubject	%Δ Quantity	▲ ***	▲ ***	▲ ***	▼ ***
All other sources	%Δ Quantity	▲ ***	▲ ***	▲ ***	▼ ***
Nonsubject sources	%Δ Quantity	▲ ***	▲ ***	▲ ***	▼ ***
All import sources	%Δ Quantity	▲ ***	▲ ***	▼ ***	▼ ***
Malaysia	%Δ Value	▲ ***	▲ ***	▲ ***	▼ ***
Taiwan	%Δ Value	▲ ***	▲ ***	▼ ***	▼ ***
Thailand, subject	%Δ Value	▲ ***	▲ ***	▲ ***	▲ ***
Vietnam	%Δ Value	▲ ***	▲ ***	▲ ***	▼ ***
Subject sources	%Δ Value	▲ 78.6	▲ 47.9	▲ 20.7	▼ (47.7)
India	%Δ Value	▲ ***	***	▲ ***	▲ ***
Thailand, nonsubject	%Δ Value	▲ ***	▲ ***	▲ ***	▼ ***
All other sources	%Δ Value	▲ ***	▲ ***	▲ ***	▼ ***
Nonsubject sources	%Δ Value	▲ ***	▲ ***	▲ ***	▼ ***
All import sources	%Δ Value	▲ ***	▲ ***	▲ ***	▼ ***
Malaysia	%Δ Unit value	▲ ***	▼ ***	▲ ***	▲ ***
Taiwan	%Δ Unit value	▲ ***	▲ ***	▲ ***	▲ ***
Thailand, subject	%Δ Unit value	▲ ***	▲ ***	▼ ***	▼ ***
Vietnam	%Δ Unit value	▲ ***	▼ ***	▲ ***	▲ ***
Subject sources	%Δ Unit value	▲ 22.4	▼ (7.2)	▲ 31.9	▲ 32.1
India	%Δ Unit value	▲ ***	***	▲ ***	▲ ***
Thailand, nonsubject	%Δ Unit value	▲ ***	▲ ***	▲ ***	▼ ***
All other sources	%Δ Unit value	▲ ***	▲ ***	▲ ***	▼ ***
Nonsubject sources	%Δ Unit value	▲ ***	▲ ***	▲ ***	▼ ***
All import sources	%Δ Unit value	▲ ***	▼ ***	▲ ***	▲ ***

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

Note: Period changes 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 "---". "Thailand, subject" is all merchandise from Thailand minus merchandise supplied by Siam Metal. Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.⁵ 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.⁶

As shown in table IV-4, imports from Malaysia, Taiwan, Thailand, subject, and Vietnam accounted for between *** percent of total imports of boltless steel shelving by quantity during April 2022 through March 2023.

⁵ 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)).

⁶ 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 to March 2023

Quantity in units; share in percent

Source of imports	Quantity	Share of quantity
Malaysia	***	***
Taiwan	***	***
Thailand, subject	***	***
Vietnam	***	***
India	***	***
Thailand, nonsubject	***	***
All other sources	***	***
All import sources	***	***

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

Cumulation considerations

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

Fungibility

Table IV-5 and figure IV-2 present U.S. shipment information for boltless steel shelving by width and source. Most 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 importers' U.S. shipments from subject sources were of boltless steel shelving less than 40 inches (***) percent), followed by boltless steel shelving between 40 and 60 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, subject, and Vietnam, however *** 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-5**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	***	***	***	***
Malaysia	***	***	***	***
Taiwan	***	***	***	***
Thailand, subject	***	***	***	***
Vietnam	***	***	***	***
Subject sources	***	***	***	***
India	***	***	***	***
Thailand, nonsubject	***	***	***	***
All other sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued.

Table IV-5 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	***	***	***	100.0
Malaysia	***	***	***	100.0
Taiwan	***	***	***	100.0
Thailand, subject	***	***	***	100.0
Vietnam	***	***	***	100.0
Subject sources	***	***	***	100.0
India	***	***	***	100.0
Thailand, nonsubject	***	***	***	100.0
All other sources	***	***	***	100.0
Nonsubject sources	***	***	***	100.0
All import sources	***	***	***	100.0
All sources	***	***	***	100.0

Table continued.

Table IV-5 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	***	***	***	***
Malaysia	***	***	***	***
Taiwan	***	***	***	***
Thailand, subject	***	***	***	***
Vietnam	***	***	***	***
Subject sources	***	***	***	***
India	***	***	***	***
Thailand, nonsubject	***	***	***	***
All other sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". "Thailand, subject" is all merchandise from Thailand minus merchandise supplied by Siam Metal.

Figure IV-2

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-6 and figure IV-3 present U.S. shipment information for boltless steel shelving by load weight and source. Most U.S. producers' U.S. shipments were of boltless steel shelving with load weight 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). The majority of importers' U.S. shipments from subject sources were of boltless steel shelving with load weight greater than 2000 pounds (** percent), followed by boltless steel shelving between 1000 and 2000 pounds (** percent), and lastly by boltless steel shelving less than 1000 pounds (** percent).

Importers reported some level of U.S. shipments in all three load weight categories for subject imports combined, however ** U.S. shipments of imports from Taiwan were of boltless steel shelving greater than 2000 pounds. Further, ** U.S. shipments of imports from Thailand, subject were of boltless shelving between 1000 and 2000 pounds, and ** U.S. shipments of imports from Vietnam were of boltless steel shelving less than 1000 pounds.

Among all sources, most U.S. shipments of boltless steel shelving between 1000 and 2000 pounds, and of shelving less than 1000 pounds, were reported by U.S. producers (***) percent and *** percent, respectively) while most U.S. shipments of shelving greater than 2000 pounds 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 load capacity, 2022

Quantity in units

Source	Less than 1000 lbs.	Between 1000 and 2000 lbs.	Greater than 2000 lbs.	All load capacities
U.S. producers	***	***	***	***
Malaysia	***	***	***	***
Taiwan	***	***	***	***
Thailand, subject	***	***	***	***
Vietnam	***	***	***	***
Subject sources	***	***	***	***
India	***	***	***	***
Thailand, nonsubject	***	***	***	***
All other sources	***	***	***	***
Nonsubject sources	***	***	***	***
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 load capacity, 2022

Share across in percent

Source	Less than 1000 lbs.	Between 1000 and 2000 lbs.	Greater than 2000 lbs.	All load capacities
U.S. producers	***	***	***	100.0
Malaysia	***	***	***	100.0
Taiwan	***	***	***	100.0
Thailand, subject	***	***	***	100.0
Vietnam	***	***	***	100.0
Subject sources	***	***	***	100.0
India	***	***	***	100.0
Thailand, nonsubject	***	***	***	100.0
All other sources	***	***	***	100.0
Nonsubject sources	***	***	***	100.0
All import sources	***	***	***	100.0
All sources	***	***	***	100.0

Table continued.

Table IV-6 Continued

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

Share down in percent

Source	Less than 1000 lbs.	Between 1000 and 2000 lbs.	Greater than 2000 lbs.	All load capacities
U.S. producers	***	***	***	***
Malaysia	***	***	***	***
Taiwan	***	***	***	***
Thailand, subject	***	***	***	***
Vietnam	***	***	***	***
Subject sources	***	***	***	***
India	***	***	***	***
Thailand, nonsubject	***	***	***	***
All other sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	100.0	100.0	100.0	100.0

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

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

Figure IV-3

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

* * * * *

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

Geographical markets

Table IV-7 presents U.S. imports by source and border of entry in 2022. Imports from Taiwan, Thailand, subject, and Vietnam entered through all four borders of entry in 2022, while imports from Malaysia entered only through eastern and western borders of entry.

Table IV-7

Boltless steel shelving: U.S. imports by source and border of entry, 2022

Quantity in units

Source	East	North	South	West	All borders
Malaysia	384,001	---	---	228,168	612,169
Taiwan	344,862	132,767	165,797	111,897	755,323
Thailand, subject	***	***	***	***	***
Vietnam	167,958	13,491	92,418	162,596	436,463
Subject sources	***	***	***	***	***
India	33,637	20,698	---	12,278	66,613
Thailand, nonsubject	***	***	***	***	***
All other sources	1,051,271	437,693	384,985	1,743,415	3,617,364
Nonsubject sources	***	***	***	***	***
All import sources	2,111,178	616,283	727,351	2,621,875	6,076,687

Table continued.

Table IV-7 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
Malaysia	62.7	---	---	37.3	100.0
Taiwan	45.7	17.6	22.0	14.8	100.0
Thailand, subject	***	***	***	***	100.0
Vietnam	38.5	3.1	21.2	37.3	100.0
Subject sources	***	***	***	***	100.0
India	50.5	31.1	---	18.4	100.0
Thailand, nonsubject	***	***	***	***	100.0
All other sources	29.1	12.1	10.6	48.2	100.0
Nonsubject sources	***	***	***	***	100.0
All import sources	34.7	10.1	12.0	43.1	100.0

Table continued.

Table IV-7 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
Malaysia	18.2	---	---	8.7	10.1
Taiwan	16.3	21.5	22.8	4.3	12.4
Thailand, subject	***	***	***	***	***
Vietnam	8.0	2.2	12.7	6.2	7.2
Subject sources	***	***	***	***	***
India	1.6	3.4	---	0.5	1.1
Thailand, nonsubject	***	***	***	***	***
All other sources	49.8	71.0	52.9	66.5	59.5
Nonsubject sources	***	***	***	***	***
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 December 14, 2023, adjusted using proprietary, Census-edited Customs records to report for Thailand subject vs. nonsubject. Imports are based on the imports for consumption data series. Data under this HTS statistical reporting number likely includes out-of-scope merchandise, particularly for nonsubject sources, and therefore the quantity is likely overstated.

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

Presence in the market

Table IV-8 and figures IV-4 and IV-5 present U.S. imports by source and month from January 2020 to September 2023. Imports from subject sources combined were present in every month of the period. Imports from each individual subject source were present in every month of the period, except imports from Thailand, subject which were present in *** months.

Table IV-8
Boltless steel shelving: Quantity of U.S. imports, by month and source

Quantity in units

Year	Month	Malaysia	Taiwan	Thailand, subject	Vietnam	Subject sources
2020	January	***	***	***	***	***
2020	February	***	***	***	***	***
2020	March	***	***	***	***	***
2020	April	***	***	***	***	***
2020	May	***	***	***	***	***
2020	June	***	***	***	***	***
2020	July	***	***	***	***	***
2020	August	***	***	***	***	***
2020	September	***	***	***	***	***
2020	October	***	***	***	***	***
2020	November	***	***	***	***	***
2020	December	***	***	***	***	***
2021	January	***	***	***	***	***
2021	February	***	***	***	***	***
2021	March	***	***	***	***	***
2021	April	***	***	***	***	***
2021	May	***	***	***	***	***
2021	June	***	***	***	***	***
2021	July	***	***	***	***	***
2021	August	***	***	***	***	***
2021	September	***	***	***	***	***
2021	October	***	***	***	***	***
2021	November	***	***	***	***	***
2021	December	***	***	***	***	***

Table continued.

Table IV-8 Continued

Boltless steel shelving: Quantity of U.S. imports, by month and source

Quantity in units

Year	Month	Malaysia	Taiwan	Thailand, subject	Vietnam	Subject sources
2022	January	***	***	***	***	***
2022	February	***	***	***	***	***
2022	March	***	***	***	***	***
2022	April	***	***	***	***	***
2022	May	***	***	***	***	***
2022	June	***	***	***	***	***
2022	July	***	***	***	***	***
2022	August	***	***	***	***	***
2022	September	***	***	***	***	***
2022	October	***	***	***	***	***
2022	November	***	***	***	***	***
2022	December	***	***	***	***	***
2023	January	***	***	***	***	***
2023	February	***	***	***	***	***
2023	March	***	***	***	***	***
2023	April	***	***	***	***	***
2023	May	***	***	***	***	***
2023	June	***	***	***	***	***
2023	July	***	***	***	***	***
2023	August	***	***	***	***	***
2023	September	***	***	***	***	***

Table continued.

Table IV-8 Continued

Boltless steel shelving: Quantity of U.S. imports, by month and source

Quantity in units

Year	Month	India	Thailand, nonsubject	All other sources	Nonsubject sources	All import sources
2020	January	***	***	***	***	***
2020	February	***	***	***	***	***
2020	March	***	***	***	***	***
2020	April	***	***	***	***	***
2020	May	***	***	***	***	***
2020	June	***	***	***	***	***
2020	July	***	***	***	***	***
2020	August	***	***	***	***	***
2020	September	***	***	***	***	***
2020	October	***	***	***	***	***
2020	November	***	***	***	***	***
2020	December	***	***	***	***	***
2021	January	***	***	***	***	***
2021	February	***	***	***	***	***
2021	March	***	***	***	***	***
2021	April	***	***	***	***	***
2021	May	***	***	***	***	***
2021	June	***	***	***	***	***
2021	July	***	***	***	***	***
2021	August	***	***	***	***	***
2021	September	***	***	***	***	***
2021	October	***	***	***	***	***
2021	November	***	***	***	***	***
2021	December	***	***	***	***	***

Table continued.

Table IV-8 Continued

Boltless steel shelving: Quantity of U.S. imports, by month and source

Quantity in units

Year	Month	India	Thailand, nonsubject	All other sources	Nonsubject sources	All import sources
2022	January	***	***	***	***	***
2022	February	***	***	***	***	***
2022	March	***	***	***	***	***
2022	April	***	***	***	***	***
2022	May	***	***	***	***	***
2022	June	***	***	***	***	***
2022	July	***	***	***	***	***
2022	August	***	***	***	***	***
2022	September	***	***	***	***	***
2022	October	***	***	***	***	***
2022	November	***	***	***	***	***
2022	December	***	***	***	***	***
2023	January	***	***	***	***	***
2023	February	***	***	***	***	***
2023	March	***	***	***	***	***
2023	April	***	***	***	***	***
2023	May	***	***	***	***	***
2023	June	***	***	***	***	***
2023	July	***	***	***	***	***
2023	August	***	***	***	***	***
2023	September	***	***	***	***	***

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

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

Figure IV-4

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

* * * * *

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

Figure IV-5

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

* * * * *

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

Apparent U.S. consumption and market shares

Quantity

Table IV-9 and figure IV-6 present data on apparent U.S. consumption and U.S. market shares by quantity for boltless steel shelving. Overall apparent consumption decreased by *** percent from 2020-22, and was *** percent lower in interim 2023 than in interim 2022.⁷

The share of apparent U.S. consumption accounted for by U.S. producers decreased by *** percentage points from 2020-22, but was *** percentage points higher in interim 2023 than in interim 2022. The share held by subject sources increased *** percentage points from 2020-22, but was *** percentage points lower in interim 2023 than in interim 2022. The share of apparent consumption accounted for by imports from Malaysia, Thailand, subject, and Vietnam increased from 2020-22, while the share held by Taiwan decreased in the same period. The share of apparent U.S. consumption accounted for by imports from Thailand, subject was higher in interim 2023 than in interim 2022, while the share was lower for all other subject sources in interim 2023 than in interim 2022.

The share held by nonsubject sources increased *** percentage points from 2020-22, and was *** percentage points higher in interim 2023 than in interim 2022.

⁷ The petitioner explained that the decline in demand in this period is due to drop-off from the uniquely higher increased demand during the COVID-19 pandemic: "...it's important to understand that through the pandemic, starting in early '22 or late 2021, there was a significant increase in demand for boltless steel shelving, driven by people staying at home. And just like we saw across the economy, do-it-yourself projects exploded. People were straightening up their garages, organizing their basements, taking on projects that they otherwise didn't have. So the decline in demand is not necessarily systemic; it was a drop-off from a significant peak. And where we are now is at a very stabilized rate and the demand for boltless steel shelving in the United States is stable at a normalized rate after we had kind of annualized the impact of the post-pandemic surge." Hearing transcript, p. 34 (White).

Table IV-9**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	Jan-Sep 2022	Jan-Sep 2023
U.S. producers	Quantity	***	***	***	***	***
Malaysia	Quantity	***	***	***	***	***
Taiwan	Quantity	***	***	***	***	***
Thailand, subject	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	1,285,725	2,030,862	1,822,862	1,465,094	654,438
India	Quantity	***	***	***	***	***
Thailand, nonsubject	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
Malaysia	Share	***	***	***	***	***
Taiwan	Share	***	***	***	***	***
Thailand, subject	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Thailand, nonsubject	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires. All import sources data are based on U.S. importers' U.S. shipments of imports.

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-6

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

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires. All import sources data are based on U.S. importers' U.S. shipments of imports.

Value

Table IV-10 and figure IV-7 present data on apparent U.S. consumption and U.S. market shares by value for boltless steel shelving. Overall apparent consumption increased by *** percent from 2020-22, but was *** percent lower in interim 2023 than in interim 2022.

The share of apparent U.S. consumption accounted for by U.S. producers decreased by *** percentage points from 2020-22, but was *** percentage points higher in interim 2023 than in interim 2022. The share held by subject sources increased *** percentage points from 2020-22, but was *** percentage points lower in interim 2023 than in interim 2022. The share of apparent consumption accounted for by imports from Malaysia and Thailand, subject increased from 2020-22, while the share held by Taiwan and Vietnam decreased in the same period. The share of apparent U.S. consumption by value accounted for by imports from Thailand, subject was higher in interim 2023 than in interim 2022, while the share was lower for Malaysia, Taiwan, and Vietnam in interim 2023 than in interim 2022.

The share held by nonsubject sources increased *** percentage points from 2020-22, and was *** percentage points higher in interim 2023 than in interim 2022.

Table IV-10**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	Jan-Sep 2022	Jan-Sep 2023
U.S. producers	Value	***	***	***	***	***
Malaysia	Value	***	***	***	***	***
Taiwan	Value	***	***	***	***	***
Thailand, subject	Value	***	***	***	***	***
Vietnam	Value	***	***	***	***	***
Subject sources	Value	84,470	116,979	131,294	102,432	65,547
India	Value	***	***	***	***	***
Thailand, nonsubject	Value	***	***	***	***	***
All other sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
Malaysia	Share	***	***	***	***	***
Taiwan	Share	***	***	***	***	***
Thailand, subject	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Thailand, nonsubject	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires. All import sources data are based on U.S. importers' U.S. shipments of imports.

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 value, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires. All import sources data are based on U.S. importers' U.S. shipments of imports.

Part V: Pricing data

Factors affecting prices

Raw material costs

Boltless steel shelving is primarily made from hot-rolled coil 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.

Prices for hot-rolled coil increased from January 2020 through September 2021, when they reached a period high (during which they were *** percent higher than January 2020 prices). Prices began to decrease after September 2021 and hit a trough in February 2022 before increasing again until April, after which there was a gradual decline until November. Overall, prices for hot-rolled coil increased by *** percent from January 2020 to December 2023 (figure V-1). Most U.S. importers (8 of 12) reported that raw material price trends had fluctuated up since January 1, 2020.¹ Importers reported that prices spiked during 2020 through 2022, but have since decreased slightly in 2023 from their peak.

Table V-1

Boltless steel shelving: Raw materials: Steel hot-rolled coil, fob mill U.S. Midwest, monthly average prices, January 2020-December 2023

Price in dollars per short ton

Month	2020	2021	2022	2023
January	***	***	***	***
February	***	***	***	***
March	***	***	***	***
April	***	***	***	***
May	***	***	***	***
June	***	***	***	***
July	***	***	***	***
August	***	***	***	***
September	***	***	***	***
October	***	***	***	***
November	***	***	***	***
December	***	***	***	***

Source: ***, accessed February 20, 2024.

¹ Importers *** reported that they had fluctuated up and down, that all input costs spiked or fluctuated up in late-2021 through mid-2022, but that most costs have come down or fluctuated down.

Figure V-1
Boltless steel shelving: Raw materials: Steel hot-rolled coil, fob mill U.S. Midwest, monthly average prices, January 2020-December 2023

* * * * *

Source: ***, accessed February 20, 2024.

Transportation costs to the U.S. market

Transportation costs for boltless steel shelving shipped from subject countries to the United States averaged 9.2 percent for Malaysia, 14.9 percent for Taiwan, 8.9 percent for Thailand, and 13.9 percent for Vietnam during 2022. These estimates were derived from official import data and represent the transportation and other charges on imports.²

U.S. inland transportation costs

Neither U.S. producers reported that they typically arrange transportation to their customers, while 7 of 11 responding importers reported that they did. U.S. producers reported that their U.S. inland transportation costs were *** percent while importers reported costs ranging between 1 and 25 percent, with most importers reporting U.S. inland transportation costs of 10 percent or less.

² 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.

Pricing practices

Pricing methods

U.S. producer *** reported setting prices using transaction-by-transaction negotiations, while *** reported using contracts and set price lists. Four importers reported setting prices using transaction-by-transaction negotiations, and two reported using other methods (table V-2).³

Bid process

Edsal reported that retailers or purchasers of boltless steel shelving will send out invitations to manufacturers 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.⁴ U.S. producer *** reported that it had not participated in line or business reviews or other requests for bids or proposals at any large U.S. customers or retailers, while *** reported that it had with ***. U.S. importer *** reported that notification of line reviews is received by a customer, after which it prepares a product presentation, product category research, a product bid, and then presents these with recommendations to its customers on the scheduled date, along with the product bid. Once bids from all suppliers are received, the customer internally reviews all bids and announces the results with award letters to suppliers. *** reported that reviews typically take between 2 to 6 months. Importer *** reported that the bid process is guided by customer demands for products and timing, and that bid awards depend on competitiveness regarding pricing, lead time, design, and test performance. *** reported that it paused its line review with Edsal due to the petition being filed.

³ These other reported methods consisted of market comparisons.

⁴ *Boltless Steel Shelving Units Prepackaged for Sale from India, Malaysia, Taiwan, Thailand, and Vietnam, Inv. Nos. 731-TA-1607-1611 (Preliminary)*, USITC Publication 5434, June 2023, p. V-4.

Table V-2**Boltless steel shelving: Count of U.S. producers' and importers' reported price setting methods**

Method	U.S. producers	U.S. importers
Transaction-by-transaction	***	4
Contract	***	6
Set price list	***	1
Other	***	2
Responding firms	2	12

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

Note: The sum of responses down may not add up to the total number of responding firms as each firm was instructed to check all applicable price setting methods employed.

U.S. producers reported selling *** and importers reported selling *** of their boltless steel shelving in the spot market (table V-3).

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	***	***

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

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

Most producers and importers reported that contract provisions such as price renegotiation, fixing to quantity or price, and indexing to raw materials did not apply to their contracts. One U.S. producer reported fixing its annual contracts to price, while one importer each reported price renegotiation and fixing to price or both price and quantity for its short-term contracts, and one reported fixing to both price and quantity and fixing to raw materials for its long-term contracts. Importer *** reported an average short-term contract duration of 90 days, *** reported 120 days, and *** reported an average long-term contract duration of 432 days.

Two purchasers reported that they purchase product daily, five purchase weekly, and two purchase monthly. Eleven of 12 responding purchasers reported that their purchasing frequency had not changed since 2020. A plurality of purchasers contacted 1 to 3 suppliers before making a purchase, and no purchaser reported contacting more than 10 suppliers.

Sales terms and discounts

U.S. producers and importers typically quote prices on an f.o.b. basis. U.S. producers reported total volume discounts (both U.S. producers), and quantity discounts (one producer). Importers reported other discount methods (reported by six importers), no discount policy (five importers), total volume discounts (four importers), and quantity discounts (two importers). Other discount policies included promotional and market-based discounts.

Price leadership

Four purchasers did not report any price leaders in the boltless steel shelving market, while two each reported that Edsal and Home Depot were price leaders and one each reported that Costco, Shin Ye (Taiwan), Tennsco, and Whalen were price leaders. Purchasers indicating the presence of price leaders indicated that these price leaders led by offering the lowest/best price, selling the most product, representing most of a firm's category sales, and introducing cost increases.

Price and purchase cost data

The Commission requested U.S. producers and importers 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 – September 2023. Firms that imported these products from Malaysia, Taiwan, Thailand, and Vietnam for own use/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

Both U.S. producers and two importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.⁵ Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' commercial shipments of boltless steel shelving, *** percent from Malaysia, and *** percent from Vietnam in 2022.

Price data for products 1-4 are presented in tables V-4 to V-7 and figures V-2 to V-5. Nonsubject source prices are presented in Appendix D.

⁵ Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates.

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 quarter

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

Period	U.S. price	U.S. 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	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***

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

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: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure V-2

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

Price of product 1

* * * * *

Volume of product 1

* * * * *

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

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 quarter

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

Period	U.S. price	U.S. quantity	Malaysia price	Malaysia quantity	Malaysia 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	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***

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

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-3

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

Price of product 2

* * * * *

Volume of product 2

* * * * *

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

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 quarter

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

Period	U.S. price	U.S. quantity	Malaysia price	Malaysia quantity	Malaysia 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	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***

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

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: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure V-4

Boltless steel shelving: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by quarter

Price of product 3

* * * * *

Volume of product 3

* * * * *

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

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 quarter

Price in dollars per unit; quantity in units.

Period	U.S. price	U.S. quantity	Malaysia price	Malaysia quantity	Malaysia 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	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***

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

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-5

Boltless steel shelving: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by quarter

Price of product 4

* * * * *

Volume of product 4

* * * * *

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

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

Four importers reported useable import purchase cost data for products 1-4. Purchase cost data reported by these firms accounted for *** percent of imports from Malaysia, *** percent of imports from Taiwan, *** percent of subject imports from Thailand, and *** percent of imports from Vietnam in 2022. Large importers/purchasers of subject merchandise included ***. Landed duty-paid purchase cost data for imports from subject imports from Malaysia, Taiwan, Thailand (subject), and Vietnam are presented in tables V-8 to V-11, along with U.S. producers' sales prices.⁶

Importers reporting import purchase cost data were asked to provide additional information regarding the costs and benefits of directly importing boltless steel shelving.

Two of 7 importers reported that they incurred additional costs beyond landed duty-paid costs by importing boltless steel shelving directly rather than purchasing from a U.S. producer or U.S. importer. Of these, two importers estimated the total additional cost incurred; estimates consisted of 3 percent and 30 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 include handling costs and in-house quality control.

Firms were also asked to describe how these additional costs incurred by importing boltless steel shelving directly compares with additional costs incurred when purchasing from a U.S. producer or U.S. importer. Importer/purchaser *** reported that the costs of importing are approximately seven times the costs of purchasing from a U.S. producer or importer when accounting for inbound freight, handling costs, occupancy costs, outbound freight, miscellaneous costs, and inventory costs, while importer/purchaser *** reported that it can leverage its global sourcing capability to manage and negotiate international contracts.

Four of 6 responding importers reported that they compare costs of importing to the cost of purchasing from a U.S. producer or importer in determining whether to import boltless steel shelving, while two (***) reported that they do not compare such costs.

Four importers identified benefits from importing boltless steel shelving directly instead of purchasing from U.S. producers or importers, including lower landed net costs through negotiated freight and customs clearance rates, availability, shorter lead times, lack of recall,

⁶ Landed duty-paid (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.

better supplier financial stability, and better control of cost, quality, production, and flow of goods.

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.

Five importers estimated that they saved between *** percent of the purchase price by importing boltless steel shelving rather than purchasing from a U.S. producer or importer.⁷ Two importers, *** and ***, reported saving 10 percent of the purchase price by importing boltless steel shelving.

⁷ Two firms reported that they based their estimates on previous company transactions, one reported basing its estimates on market research, and 3 reported other bases for their estimates, including internal analysis, estimated pricing over a 3-year period, and quotes from U.S. producers/importers.

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, price-cost differential in percent.

Period	U.S. price	U.S. quantity	Malaysia unit LDP value	Malaysia quantity	Malaysia 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	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***

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

Price and LDP value in dollars per unit, quantity in units, price-cost differential in percent.

Period	Thailand, subject unit LDP value	Thailand, subject quantity	Thailand, subject differential	Vietnam unit LDP value	Vietnam quantity	Vietnam 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	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***

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

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..

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

Figure V-6

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: 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-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, price-cost differential in percent.

Period	U.S. price	U.S. quantity	Malaysia unit LDP value	Malaysia quantity	Malaysia 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	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***

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

Price and LDP value in dollars per unit, quantity in units, price-cost differential in percent.

Period	Thailand, subject unit LDP value	Thailand, subject quantity	Thailand, subject differential	Vietnam unit LDP value	Vietnam quantity	Vietnam 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	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***

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

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.

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

Figure V-7
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: 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-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, price-cost differential in percent.

Period	U.S. price	U.S. quantity	Malaysia unit LDP value	Malaysia quantity	Malaysia 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	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***

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

Price and LDP value in dollars per unit, quantity in units, price-cost differential in percent.

Period	Thailand, subject unit LDP value	Thailand, subject quantity	Thailand, subject differential	Vietnam unit LDP value	Vietnam quantity	Vietnam 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	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***

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

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.

Note: "Thailand, subject" refers to all other imports of boltless steel shelving from Thailand other than those by Siam Metal Tech Co., Ltd. *** submitted supplemental information to its importers' questionnaire with *** data for *** specific to Siam Metal. Data for "Thailand, subject" subtracts out these data.

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

Figure V-8
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: 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: "Thailand, subject" refers to all other imports of boltless steel shelving from Thailand other than those by Siam Metal Tech Co., Ltd. *** submitted supplemental information to its importers' questionnaire with *** data for *** specific to Siam Metal. Data for "Thailand, subject" subtracts out these data.

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, price-cost differential in percent.

Period	U.S. price	U.S. quantity	Malaysia unit LDP value	Malaysia quantity	Malaysia 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	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***

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

Price and LDP value in dollars per unit, quantity in units, price-cost differential in percent.

Period	Thailand, subject unit LDP value	Thailand, subject quantity	Thailand, subject differential	Vietnam unit LDP value	Vietnam quantity	Vietnam 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	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***

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

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.

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

Figure V-9
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: 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: "Thailand, subject" refers to all other imports of boltless steel shelving from Thailand other than those by Siam Metal Tech Co., Ltd. *** submitted supplemental information to its importers' questionnaire with pricing data for *** specific to Siam Metal. Data for "Thailand, subject" subtracts out these data.

Price and purchase cost trends

In general, prices ultimately increased between January 2020 – September 2023. U.S. producers' prices reached their peak in the second quarter of 2022, while U.S. importer purchase costs peaked in the fourth quarter of 2022. Tables V-12 to V-13 summarize the price trends, by country and by product. As shown in the table, domestic price increases ranged from *** percent during January 2020-September 2023.

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	Quantity	Low price	High price	First quarter price	Last quarter price	Change in price over period
Product 1	United States	***	***	***	***	***	***	***
Product 1	Malaysia price	***	***	***	***	***	***	***
Product 1	Taiwan price	***	***	***	***	***	***	***
Product 1	Thailand, subject price	***	***	***	***	***	***	***
Product 1	Vietnam price	***	***	***	***	***	***	***
Product 2	United States	***	***	***	***	***	***	***
Product 2	Malaysia price	***	***	***	***	***	***	***
Product 2	Taiwan price	***	***	***	***	***	***	***
Product 2	Thailand, subject price	***	***	***	***	***	***	***
Product 2	Vietnam price	***	***	***	***	***	***	***
Product 3	United States	***	***	***	***	***	***	***
Product 3	Malaysia price	***	***	***	***	***	***	***
Product 3	Taiwan price	***	***	***	***	***	***	***
Product 3	Thailand, subject price	***	***	***	***	***	***	***
Product 3	Vietnam price	***	***	***	***	***	***	***
Product 4	United States	***	***	***	***	***	***	***
Product 4	Malaysia price	***	***	***	***	***	***	***
Product 4	Taiwan price	***	***	***	***	***	***	***
Product 4	Thailand, subject price	***	***	***	***	***	***	***
Product 4	Vietnam price	***	***	***	***	***	***	***

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.

Note: "Thailand, subject" refers to all other imports of boltless steel shelving from Thailand other than those by Siam Metal Tech Co., Ltd. *** submitted supplemental information to its importers' questionnaire with pricing data for *** specific to Siam Metal. Data for "Thailand, subject" subtracts out these data.

Table V-13

Boltless steel shelving: Boltless steel shelving: Summary of purchase cost data, by product and source, January 2020 through September 2023

Quantity in units, cost in dollars per unit, and change in cost in percent.

Product	Source	Number of quarters	Quantity	Low cost	High cost	First quarter cost	Last quarter cost	Percent change in cost over period
Product 1	United States	***	***	***	***	***	***	***
Product 1	Malaysia cost	***	***	***	***	***	***	***
Product 1	Taiwan cost	***	***	***	***	***	***	***
Product 1	Thailand, subject price	***	***	***	***	***	***	***
Product 1	Vietnam cost	***	***	***	***	***	***	***
Product 2	United States	***	***	***	***	***	***	***
Product 2	Malaysia cost	***	***	***	***	***	***	***
Product 2	Taiwan cost	***	***	***	***	***	***	***
Product 2	Thailand, subject price	***	***	***	***	***	***	***
Product 2	Vietnam cost	***	***	***	***	***	***	***
Product 3	United States	***	***	***	***	***	***	***
Product 3	Malaysia, cost	***	***	***	***	***	***	***
Product 3	Taiwan cost	***	***	***	***	***	***	***
Product 3	Thailand, subject price	***	***	***	***	***	***	***
Product 3	Vietnam cost	***	***	***	***	***	***	***
Product 4	United States	***	***	***	***	***	***	***
Product 4	Malaysia, cost	***	***	***	***	***	***	***
Product 4	Taiwan cost	***	***	***	***	***	***	***
Product 4	Thailand, subject price	***	***	***	***	***	***	***
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.

Note: "Thailand, subject" refers to all other imports of boltless steel shelving from Thailand other than those by Siam Metal Tech Co., Ltd. *** submitted supplemental information to its importers' questionnaire with pricing data for *** specific to Siam Metal. Data for "Thailand, subject" subtracts out these data.

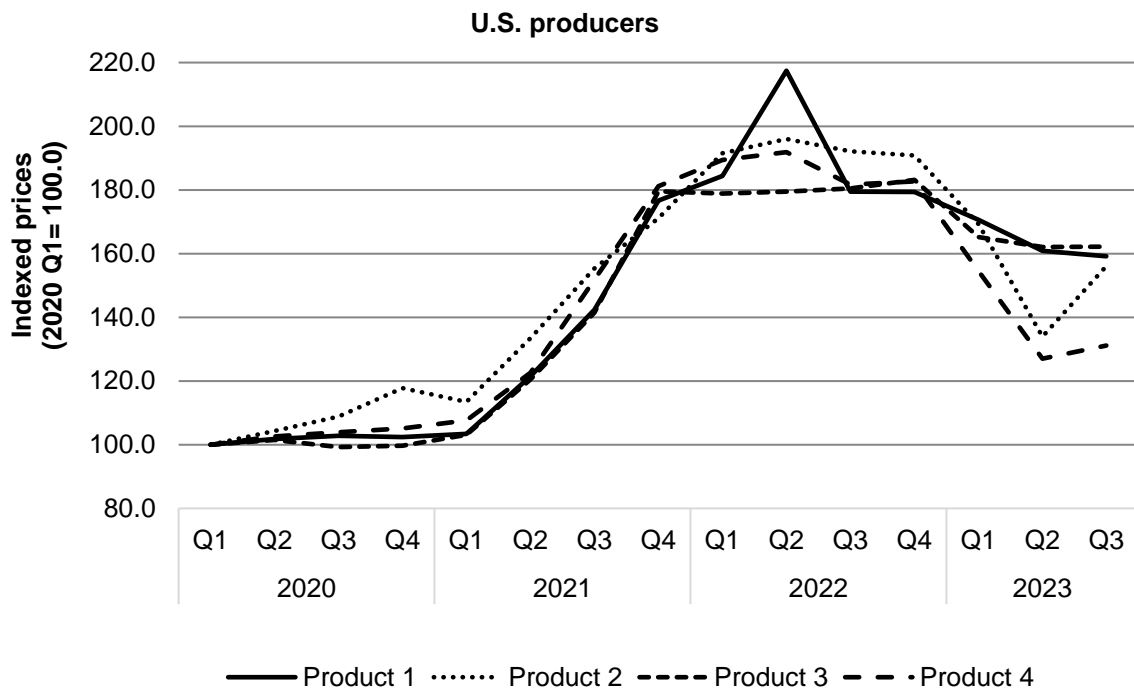
Table V-14**Boltless steel shelving: Indexed U.S. producer prices, by quarter**

Period	Product 1	Product 2	Product 3	Product 4
2020 Q1	100.0	100.0	100.0	100.0
2020 Q2	101.8	104.3	101.5	102.7
2020 Q3	102.9	108.8	99.3	103.9
2020 Q4	102.5	117.8	99.7	105.1
2021 Q1	103.4	113.4	103.1	107.6
2021 Q2	121.5	133.4	120.5	122.6
2021 Q3	142.4	155.4	141.5	151.8
2021 Q4	176.7	171.1	179.6	181.1
2022 Q1	184.3	191.6	178.9	189.4
2022 Q2	217.4	196.0	179.5	191.9
2022 Q3	179.5	192.1	180.5	181.7
2022 Q4	179.4	190.8	183.2	182.7
2023 Q1	170.6	169.4	165.2	154.6
2023 Q2	160.9	134.0	162.1	127.0
2023 Q3	159.2	156.1	162.1	131.1

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 V-10
Boltless steel shelving: Indexed U.S. producer prices, by quarter



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

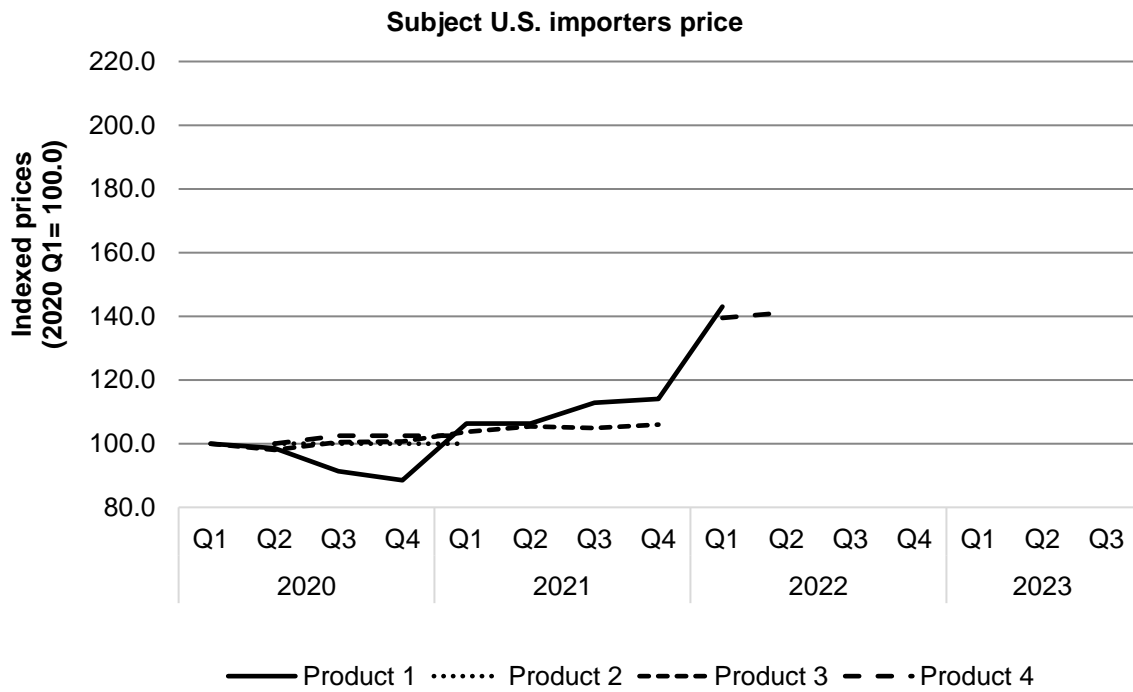
Table V-15**Boltless steel shelving: Indexed subject U.S. importer prices, by quarter**

Period	Product 1	Product 2	Product 3	Product 4
2020 Q1	100.0	---	100.0	---
2020 Q2	98.6	100.0	98.0	100.0
2020 Q3	91.3	100.0	100.5	102.5
2020 Q4	88.5	100.0	100.7	102.5
2021 Q1	106.3	100.0	103.7	102.5
2021 Q2	106.3	---	105.4	---
2021 Q3	112.9	---	104.9	---
2021 Q4	114.1	---	106.0	---
2022 Q1	143.0	---	---	139.5
2022 Q2	---	149.1	---	141.2
2022 Q3	---	---	---	---
2022 Q4	---	---	---	---
2023 Q1	---	163.3	---	160.9
2023 Q2	---	---	---	---
2023 Q3	---	160.8	---	158.8

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 V-11
Boltless steel shelving: Indexed subject U.S. importer prices, by quarter



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

Note: Products 2 and 4 are indexed to Q2 2020.

Table V-16**Boltless steel shelving: Indexed U.S. importers' purchase costs, by quarter**

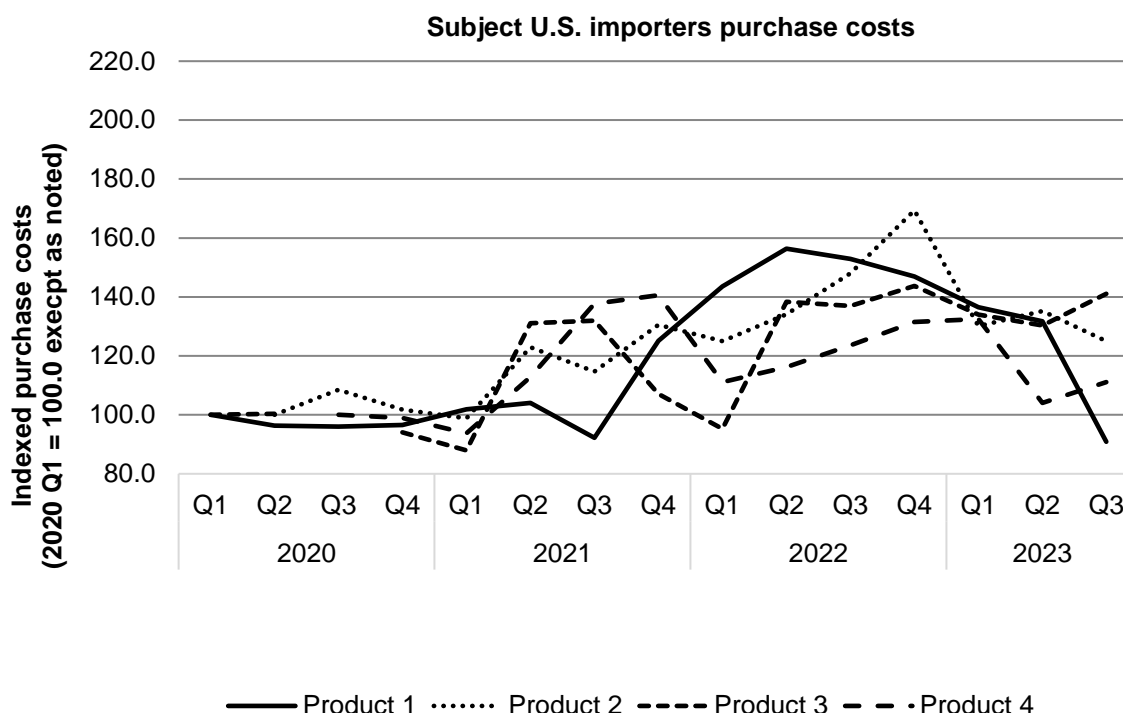
Period	Product 1	Product 2	Product 3	Product 4
2018 Q1	100.0	---	100.0	---
2018 Q2	96.4	100.0	100.4	---
2018 Q3	96.0	108.5	---	100.0
2018 Q4	96.6	101.8	94.1	98.9
2019 Q1	101.9	98.8	87.9	93.7
2019 Q2	104.1	122.9	131.1	112.8
2019 Q3	92.2	114.7	132.0	137.7
2019 Q4	125.1	130.6	107.1	140.6
2020 Q1	143.6	125.0	95.2	111.1
2020 Q2	156.4	134.1	138.3	116.3
2020 Q3	152.9	148.0	136.9	123.6
2020 Q4	147.0	169.4	143.7	131.5
2021 Q1	136.5	130.1	134.0	132.5
2021 Q2	131.7	135.2	130.3	104.0
2021 Q3	90.9	125.0	141.1	111.1

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 V-12

Boltless steel shelving: Indexed U.S. importers' purchase costs, by quarter



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

Note: Product 2 is indexed to Q2 2020, while product 4 is indexed to Q3 2020.

Price and purchase cost comparisons

Price comparisons

Prices for pricing product 1 imported from subject sources undersold U.S.-produced product in 12 of 13 instances (***) ; margins of underselling ranged from *** percent (table V-17). Prices for pricing product 2 imported from subject sources undersold U.S.-produced product in all 7 instances (***) ; margins of underselling ranged from *** percent. Prices for pricing product 3 imported from subject sources undersold U.S.-produced product in all 8 instances (***) ; margins of underselling ranged from *** percent. Prices for pricing product 4 imported from subject sources undersold U.S.-produced product in 7 of 8 instances (***) ; margins of underselling ranged from *** percent. As shown in table V-18, prices for subject product imported from Malaysia undersold U.S.-produced product in 29 of 31 instances (***) ; margins of underselling ranged from *** percent. Prices for boltless steel shelving imported from Vietnam

undersold domestically produced product in all 5 instances (***) margins ranged from *** percent.

Table V-17

Boltless steel shelving: Instances of underselling and overselling and the range and average of margins, by product

Quantity in units; margins in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	12	***	***	***	***
Product 2	Underselling	7	***	***	***	***
Product 3	Underselling	8	***	***	***	***
Product 4	Underselling	7	***	***	***	***
All products	Underselling	34	***	***	***	***
Product 1	Overselling	1	***	***	***	***
Product 2	Overselling	---	***	***	***	***
Product 3	Overselling	---	***	***	***	***
Product 4	Overselling	1	***	***	***	***
All products	Overselling	2	***	***	***	***

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

Table V-18

Boltless steel shelving: Instances of underselling and overselling and the range and average of margins, by source

Quantity in units; margins in percent

Source	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Malaysia	Underselling	29	***	***	***	***
Taiwan	Underselling	---	***	***	***	***
Thailand, subject	Underselling	---	***	***	***	***
Vietnam	Underselling	5	***	***	***	***
All subject sources	Underselling	34	***	***	***	***
Malaysia	Overselling	2	***	***	***	***
Taiwan	Overselling	---	***	***	***	***
Thailand, subject	Overselling	---	***	***	***	***
Vietnam	Overselling	---	***	***	***	***
All subject sources	Overselling	2	***	***	***	***

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

Note: “Thailand, subject” refers to all other imports of boltless steel shelving from Thailand other than those by Siam Metal Tech Co., Ltd. *** submitted supplemental information to its importers’ questionnaire with pricing data for *** specific to Siam Metal. Data for “Thailand, subject” subtracts out these data.

Purchase cost comparisons

As shown in table V-19, prices for pricing product 1 were below those for U.S.-produced product in 19 of 33 instances (***) units), prices for pricing product 2 were below those for U.S.-produced product in 29 of 40 instances (***) units), prices for pricing product 3 were below those for U.S.-produced product in all 16 instances (***) units), and prices for pricing product 4 were below those for U.S.-produced product in 15 of 25 instances (***) units). As shown in table V-20, prices for subject product imported from Malaysia were below those for U.S.-produced product in 15 of 28 instances (***) units); the differentials were *** percent. In the remaining 13 instances (***) units), prices for subject product from Malaysia were between *** percent above prices for the domestic product. Prices for subject product imported from Taiwan were below those for U.S.-produced product in 7 of 14 instances (***) units); differentials were between *** percent. In the remaining 7 instances (***) units), prices for subject product from Taiwan were between *** percent above prices for the domestic product. Prices for subject product imported from Thailand were below those for U.S.-produced product in 23 of 28 instances (***) units); differentials were between *** percent. In the remaining 5 instances (***) units), prices for subject product from Thailand were between *** percent above prices for the domestic product. Prices for subject product imported from Vietnam were below those for U.S.-produced product in 34 of 44 instances (***) units); differentials were between *** percent. In the remaining 10 instances (***) units), prices for subject product from Thailand were between *** percent above prices for the domestic product.

Table V-19

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 US	19	***	***	***	***
Product 2	Lower than US	29	***	***	***	***
Product 3	Lower than US	16	***	***	***	***
Product 4	Lower than US	15	***	***	***	***
All products	Lower than US	79	2,972,598	21.4	0.4	53.9
Product 1	Higher than US	14	***	***	***	***
Product 2	Higher than US	11	***	***	***	***
Product 3	Higher than US	---	***	***	***	***
Product 4	Higher than US	10	***	***	***	***
All products	Higher than US	35	981,217	(12.5)	(0.0)	(109.7)

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-20

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
Malaysia	Lower than US	15	***	***	***	***
Taiwan	Lower than US	7	***	***	***	***
Thailand, subject	Lower than US	23	***	***	***	***
Vietnam	Lower than US	34	***	***	***	***
All subject sources	Lower than US	79	2,972,598	21.4	0.4	53.9
Malaysia	Higher than US	13	***	***	***	***
Taiwan	Higher than US	7	***	***	***	***
Thailand, subject	Higher than US	5	***	***	***	***
Vietnam	Higher than US	10	***	***	***	***
All subject sources	Higher than US	35	981,217	(12.5)	(0.0)	(109.7)

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

Note: Changes in shares represent the share of the firm's total purchases of domestic and/or subject country imports between first and last years and are presented in percentage points. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Note: "Thailand, subject" refers to all other imports of boltless steel shelving from Thailand other than those by Siam Metal Tech Co., Ltd. *** submitted supplemental information to its importers' questionnaire with pricing data for *** specific to Siam Metal. Data for "Thailand, subject" subtracts out these data.

Lost sales and lost revenue

In the preliminary phase of the investigations, 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. One U.S. producer, ***, submitted lost sales and lost revenue allegations and identified eight firms with which it lost sales or revenue (43 consisting of lost sales allegations, 17 consisting of lost revenue allegations, and no allegations consisting of both types). ***.

In the final phase of the investigations, of the two responding U.S. producers, one (***) reported that it had reduced prices, rolled back announced price increases, and lost sales.

Staff contacted 20 purchasers and received responses from 12.⁸ Responding purchasers reported purchasing *** units of boltless steel shelving during January 2020 - September 2023. Purchases and imports totaled *** units (table V-21).⁹

Of the 12 responding purchasers, four reported that, since 2020, they had purchased imported boltless steel shelving from Vietnam, three from Thailand, two from Taiwan, and one had purchased subject Malaysian merchandise instead of U.S.-produced product. Each of these purchasers reported that import prices were lower than those of U.S.-produced products. One purchaser each reported that price was a primary reason for the decision to purchase product from Malaysia, Taiwan, and Vietnam, and two reported that it was for the decision to purchase product from Thailand. Purchaser *** reported that price was a primary reason it purchased subject product from Malaysia; *** reported that price was a primary reason it purchased subject product from Taiwan; purchasers *** reported that price was a primary reason they purchased product from Thailand, and *** reported the same for subject product from Vietnam (table V-22). Six purchasers estimated the quantity of boltless steel shelving from subject sources purchased instead of domestic product, quantities reported ranged from *** units (***) to *** units (***) (table V-23). Purchasers identified quality, value, product assortment, available quantities, and vendor relationships as non-price reasons for purchasing imported rather than U.S.-produced product.

Of the 12 responding purchasers, one (***) reported that U.S. producers had reduced prices in order to compete with lower-priced imports from subject countries; five reported that they did not know (table V-24). The reported estimated price reduction was *** percent for Thailand and Vietnam. In describing the price reductions, importer/purchaser *** indicated that its suppliers approached it about a price decrease after raw material costs decreased after the pandemic, while its domestic supplier claimed it was not experiencing the same cost reductions (table V-24).

⁸ All purchasers that submitted lost sales lost revenue survey responses in the preliminary phase submitted purchaser questionnaire responses in the final phase.

⁹ ***.

Table V-21**Boltless steel shelving: Purchasers' reported purchases and imports, by firm and source**

Quantity in units, share in percent

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

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

Note: Changes in shares represent the share of the firm's total purchases of domestic and/or subject country imports between first and last years and are presented in percentage points. Zeroes, null values, and undefined calculations are suppressed and shown as "---". All data from Thailand are classified as subject merchandise in the data above as a subject vs. nonsubject breakout is unavailable for Thailand.

Table V-22

Boltless steel shelving: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in units

Purchaser	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Explanation
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All firms	Yes--6; No--6	Yes--6; No--1	Yes--3; No--4	***	NA

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

Table V-23

Boltless steel shelving: Purchasers' responses to purchasing subject imports instead of domestic product, by source

Count in number of firms; 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
Malaysia	1	1	1	***
Taiwan	2	2	1	***
Thailand	3	3	2	***
Vietnam	4	4	1	***
Subject sources	6	6	3	***

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

Note: All data from Thailand are classified as subject merchandise in the data above as a subject vs. nonsubject breakout is unavailable for Thailand.

Table V-24

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
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
All firms	Yes--1; No--6	***	NA

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

Part VI: Financial experience of U.S. producers

Background¹

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 and on the basis of GAAP.^{2 3}

Figure VI-1 presents each responding firm's share of the total reported net sales quantity in 2022.⁴

¹ The following abbreviations are 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").

² ***. U.S. producer questionnaire response, section III-2A.

³ In its U.S. producers' questionnaire response, ***. In response to ITC staff questions, ***. Email from ***, May 17, 2023.

⁴ Staff conducted a verification of *** U.S. producer questionnaire data, and changes from the verification are incorporated within the report.

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.

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	Jan-Sep 2022	Jan-Sep 2023
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Raw materials	Value	***	***	***	***	***
COGS: Direct labor	Value	***	***	***	***	***
COGS: Other factory	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Other expense/or (income) net	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Raw materials	Ratio to NS	***	***	***	***	***
COGS: Direct labor	Ratio to NS	***	***	***	***	***
COGS: Other factory	Ratio to NS	***	***	***	***	***
COGS: Total	Ratio to NS	***	***	***	***	***
Gross profit	Ratio to NS	***	***	***	***	***
SG&A expense	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table continued.

Table VI-1 Continued**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	Jan-Sep 2022	Jan-Sep 2023
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 total COGS. 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	Jan-Sep 2022-23
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	Jan-Sep 2022-23
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	Jan-Sep 2022	Jan-Sep 2023
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	Jan-Sep 2022	Jan-Sep 2023
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	Jan-Sep 2022	Jan-Sep 2023
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	Jan-Sep 2022	Jan-Sep 2023
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

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
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

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
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

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
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

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
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

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
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

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
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

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
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

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
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

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
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

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
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

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
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

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
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

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
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

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
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

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
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

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
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	Jan-Sep 2022	Jan-Sep 2023
Edsal	***	***	***	***	***
Tennsco	***	***	***	***	***
All firms	***	***	***	***	***

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

Net sales

As shown in table VI-1, total net sales quantity decreased by *** percent from 2020 to 2022, while total net sales value increased irregularly by *** percent during the same period, with all the increase occurring from 2020 to 2021 (***).⁵ Both total sales quantity and value were lower in January-September 2023 (“interim 2023”) compared with January-September 2022 (“interim 2022”) by *** percent, respectively. As shown in table VI-3, *** U.S. producers showed the same directional trends, an overall decrease in sales quantity from 2020 to 2022, and an increase in sales values from 2020 to 2021 influencing the overall trends of sales values from 2020 to 2022.^{6 7} *** U.S. producers reported a lower sales quantity and value in interim 2023 compared with interim 2022. On an average per unit basis, sales value increased from \$*** in 2020 to \$*** in 2022, and was lower in interim 2023 at \$*** compared with \$*** in interim 2022. *** U.S. producers had similar directional trends in the full year periods and in the comparable interim periods. ***. 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 ***

⁵ Neither firm reported internal consumption nor transfers to related firms.

⁶ ***. Edsal’s postconference brief, p. 38, footnote 28.

⁷ ***. Email from ***, January 26, 2024.

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.

Raw material costs, the *** component of COGS, increased by *** percent from 2020 to 2021, then decreased by *** percent from 2021 to 2022, and increased overall by *** percent from 2020 to 2022. Raw material costs were *** percent lower in interim 2023 compared with interim 2022. Changes in raw material costs reflect the changes of steel prices during the full years and comparable interim periods.^{9 10} On an average per unit basis, raw material costs increased from \$*** in 2020 to \$*** in 2021 to \$*** in 2022, and were lower in interim 2023 at \$*** compared with interim 2022 at \$***. As shown in table VI-3, *** U.S. producers reported an overall increase from 2020 to 2022, and lower unit values in interim 2023 compared with interim 2022. As a ratio to net sales, raw material costs increased irregularly from *** percent in 2020 to *** percent in 2022, and were lower in interim 2023 at *** percent compared with interim 2022 at *** percent.

Table VI-4 presents details on specific raw material inputs as a share of total raw material costs in 2022. Steel vertical and horizontal supports and decking materials represented the largest shares of raw material costs, accounting for *** percent, respectively. Packaging and other material inputs accounted for the remaining ***, respectively. Table VI-4 also presents details on whether raw material inputs were purchased

⁸ Tensco produced ***. In addition, ***. U.S. producer's questionnaire, sections II-9 and IV-26. In response to a staff inquiry as to why ***. Email from ***, May 15, 2023.

⁹ ***. Email from ***, January 30, 2024.

¹⁰ ***. Emails from ***, January 26, and January 30, 2024.

domestically or imported. As shown in table VI-4, *** percent of raw material inputs were domestic and the remaining *** percent were imported.¹¹

Table VI-4
Boltless steel shelving: U.S. producers' raw material costs in 2022

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

Item	Value	Share of value
Domestic: Steel vertical and horizontal supports	***	***
Imported: Steel vertical and horizontal supports	***	***
Domestic: Decking materials	***	***
Imported: Decking materials	***	***
Domestic: Packaging material	***	***
Imported: Packaging material	***	***
Domestic: Other material inputs	***	***
Imported: 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, which represented the *** component of COGS, decreased by *** percent from 2020 to 2022, and were *** percent lower in interim 2023 compared with interim 2022. On an average per unit basis, direct labor costs increased from \$*** in 2020 to \$*** in 2022, and were higher in interim 2023 at \$*** compared with interim 2022 at \$***. As shown in table VI-3, *** varied in directional trends. ***. As a ratio to net sales, direct labor costs decreased from *** percent in 2020 to *** percent in 2022, and were higher in interim 2023 at *** percent compared with interim 2022 at *** percent.

Other factory costs, the *** component of COGS, irregularly increased by *** percent from 2020 to 2022, and were *** percent lower in interim 2023 compared with interim 2022. On an average per unit basis, other factory costs increased from \$*** in 2020 to \$*** in 2022, and were lower in interim 2023 at \$*** compared with \$*** in interim 2022. As shown in table VI-3, ***

¹¹ Petitioner indicated that they purchase almost 100 percent of their steel from local steel manufacturers in Indiana, Michigan, Illinois and Ohio. Hearing transcript pp. 59-60 (White).

***. As a ratio to net sales, other factory costs irregularly decreased from *** percent in 2020 to *** percent in 2022, and were higher at *** percent in interim 2023 compared with *** percent in interim 2022.

Overall, total COGS primarily reflected the trends of raw material costs and increased by *** percent from 2020 to 2021, then decreased by *** percent from 2021 to 2022, and increased overall by *** percent from 2020 to 2022. Total COGS were *** percent lower in interim 2023 compared with interim 2022. On an average per unit basis, total COGS increased from \$*** in 2020 to \$*** in 2022, and was lower in interim 2023 at \$*** compared with interim 2022 at \$***. As a ratio to net sales, total COGS irregularly increased from *** percent in 2020 to *** percent in 2022, and was lower in interim 2023 at *** percent compared with interim 2022 at *** percent.

As shown in table VI-1, gross profit irregularly decreased from \$*** in 2020 to \$*** in 2021, and \$*** in 2022. Gross profit was notably higher in interim 2023 at \$*** compared with interim 2022 at \$***. The ***. ***.¹² As a ratio to net sales, gross profit irregularly decreased from *** percent in 2020 to *** in 2022, and was notably higher in interim 2023 at *** percent compared with interim 2022 at *** percent.

SG&A expenses and operating income or loss

U.S. producers SG&A expenses irregularly increased by *** percent from 2020 to 2022, and were *** percent higher in interim 2023 compared with interim 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 2022, and was higher in interim 2023 at *** percent compared with interim 2022 at *** percent. As shown in table VI-3, ***. ***

¹² The majority of the increase in ***. Email from ***, March 14, 2024.

***.¹³

As shown in table VI-1, operating income notably decreased from \$*** in 2020 to \$*** in 2021, then increased to \$*** in 2022. Operating income was higher in interim 2023 at \$*** compared with *** in interim 2022. Similar to gross profit, the ***. ***. As a ratio to net sales, operating income irregularly decreased from *** percent in 2020 to *** percent in 2022, and was higher in interim 2023 at *** percent compared with *** percent in interim 2022.

All other expenses and net income or loss

Interest expense was reported ***, and was the only category of other expenses or income reported by either firm. Total interest expense increased from \$*** in 2020 to \$*** in 2021 and \$*** in 2022, and was higher in interim 2023 at \$*** compared with interim 2022 at \$***.¹⁴

As shown in table VI-1, net income decreased from *** in 2020 to *** in 2021, and *** in 2022, and was higher at *** in interim 2023 compared with *** in interim 2023.

¹³ ***. Email from ***, January 30, 2024, and U.S. questionnaire response, sections III-9j and III-9k.

¹⁴ ***. Email from ***, January 30, 2024.

As shown in table VI-3, ***. As a ratio to net sales, net income decreased from *** percent in 2020 to *** percent in 2022, and was higher in interim 2023 at *** percent compared with *** percent in interim 2022.

Variance analysis

A variance analysis for the operations of U.S. producers of boltless steel shelving is presented in table VI-5.¹⁵ The information for this variance analysis is derived from table VI-1. The variance analysis shows that the decrease in operating income from 2020 to 2022 was the result of the unfavorable cost and volume variances combined that outweighed the favorable price variance. Between the comparable interim periods, the increase in operating income was primarily attributable to a greater decline in unit costs compared to unit sales value.

¹⁵ 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.

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	Jan-Sep 2022-23
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: Unfavorable variances are shown in parentheses; all others are favorable.

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. Capital expenditures reported by *** notably decreased from \$*** in 2020 to \$*** in 2021, then increased to \$*** in 2022, and were lower in interim 2023 at \$*** compared with interim 2022 at \$***.¹⁶

¹⁶ ***. Email from ***, January 30, 2024.

Similar to capital expenditures, R&D expenses were reported by *** and notably increased from \$*** in 2020 to \$*** in 2022. R&D expenses were lower in interim 2023 at \$*** compared with interim 2022 at \$***.¹⁷

Table VI-6
Boltless steel shelving: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
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	Jan-Sep 2022	Jan-Sep 2023
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.

¹⁷ ***. Email from ***, January 30, 2024.

Assets and return on assets

Table VI-10 presents data on the U.S. producers' total assets while table VI-11 presents their operating ROA.¹⁸ Table VI-12 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time. Total assets decreased overall from 2020 to 2022, and the operating ROA decreased irregularly from *** percent in 2020 to *** percent in 2022.

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.

¹⁸ 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.

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, by firm and effect

Item	Firm name and narrative on impact of imports
Cancellation, postponement, or rejection of expansion projects	***
Other negative effects on investments	***
Ability to service debt	***

Item	Firm name and narrative on impact of imports
Other effects on growth and development	***
Anticipated effects of imports	***
Anticipated effects of imports	***

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

Part VII: Threat considerations and information on nonsubject countries

Section 771(7)(F)(i) of the Act (19 U.S.C. § 1677(7)(F)(i)) provides that—

In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors¹--

- (I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,*
- (II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,*
- (III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,*
- (IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports,*
- (V) inventories of the subject merchandise,*

¹ Section 771(7)(F)(ii) of the Act (19 U.S.C. § 1677(7)(F)(ii)) provides that “The Commission shall consider {these factors} . . . as a whole in making a determination of whether further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted under this title. The presence or absence of any factor which the Commission is required to consider . . . shall not necessarily give decisive guidance with respect to the determination. Such a determination may not be made on the basis of mere conjecture or supposition.”

- (VI) *the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products,*
- (VII) *in any investigation under this title which involves imports of both a raw agricultural product (within the meaning of paragraph (4)(E)(iv)) and any product processed from such raw agricultural product, the likelihood that there will be increased imports, by reason of product shifting, if there is an affirmative determination by the Commission under section 705(b)(1) or 735(b)(1) with respect to either the raw agricultural product or the processed agricultural product (but not both),*
- (VIII) *the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and*
- (IX) *any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).²*

Information on the volume and pricing of imports of the subject merchandise is presented in Parts IV and V; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in Part VI. Information on inventories of the subject merchandise; foreign producers' operations, including the potential for "product-shifting;" any other threat indicators, if applicable; and any dumping in third-country markets, follows. Also presented in this section of the report is information obtained for consideration by the Commission on nonsubject countries.

² Section 771(7)(F)(iii) of the Act (19 U.S.C. § 1677(7)(F)(iii)) further provides that, in antidumping investigations, "... the Commission shall consider whether dumping in the markets of foreign countries (as evidenced by dumping findings or antidumping remedies in other WTO member markets against the same class or kind of merchandise manufactured or exported by the same party as under investigation) suggests a threat of material injury to the domestic industry."

Subject countries

The Commission issued foreign producers' or exporters' questionnaires to 11 firms for which valid contact information was obtained that are believed to produce and/or export boltless steel shelving from Malaysia, Taiwan, Thailand, and Vietnam.³ Usable responses to the Commission's questionnaire were received from three firms:⁴ one firm in Thailand, and two firms in Vietnam.⁵

For the firms from Thailand and Vietnam, these firms' exports to the United States accounted for approximately the following shares of U.S. imports of boltless steel shelving by source in 2022:⁶

- Thailand: *** percent
- Vietnam: *** percent

According to estimates requested of the responding producers in the subject countries, the production of boltless steel shelving reported in questionnaires account for approximately the following shares of overall production of boltless steel shelving in the individual sources in 2022: *** production in Thailand, and *** percent in Vietnam. Table VII-1 presents information on the boltless steel shelving operations of the responding producers and exporters in Thailand and Vietnam.

³ These firms were identified through a review of information submitted in the petition and through staff research.

⁴ A firm in India also submitted a usable response to the Commission's questionnaire. Commerce determined that imports of boltless steel shelving from India are not being, or not likely, to be sold in the United States at LTFV, and the Commission subsequently terminated its investigation concerning India. Therefore, data reported by this producer is not included in this Part.

⁵ These two firms are Quoc Ham Co., Ltd. ("Quoc Ham") and Cuong Nghia Import Export Trading Service Company Limited ("Cuong Nghia"). Cuong Nghia ***. Staff believes these ***, and so relevant tables in this Part concerning the industry in Vietnam only include exports reported by Quoc Ham.

⁶ These shares reflect a comparison of export data reported by firms in response to the Commission's foreign producer/exporter questionnaire to imports reported in questionnaire data in 2022. One foreign questionnaire recipient from Thailand responded that it had not produced boltless steel shelving since January 1, 2020.

Table VII-1
Boltless steel shelving: Summary data for subject foreign producers, by firm, 2022

Quantity in units; share in percent

Producer and (subject foreign industry)	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 (Thailand)	***	***	***	***	***	***
Quoc Ham (Vietnam)	***	***	***	***	***	***
All individual producers	***	***	***	***	***	***

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

Table VII-2 presents events in subject countries' industries since January 1, 2020.

Table VII-2
Boltless steel shelving: Important industry events in subject countries since 2020

Item (Country)	Firm or organization	Event
Product sales prospects (Malaysia)	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 (Malaysia)	Eonmetall	February 2023— Two years after Eonmetall entered the U.S. market, U.S. sales had become 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 was generated from sales of steel shelving products, which would include boltless steel shelving.
New facility (Malaysia)	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 State. 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.”
New producer (Thailand)	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.

Table continued.

Table VII-2 Continued

Boltless steel shelving: Important industry events in subject countries since 2020

Item (Country)	Firm or organization	Event
Government directive (Vietnam)	TRAV	May 2023 — The Trade Remedies Authority of Viet Nam (“TRAV”) reportedly recommended that producers and exporters of boltless steel shelving “keep a close watch on the developments” in Commerce’s and the Commission’s investigations of BSS imports.

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://theedgemalaysia.com/article/demand-steel-racking-systems-robust-ecommerce-fuels-warehouse-expansion-says-eonmetall-ceo>;

Intan Farhana Zainul, “US-China Trade Tensions a Tailwind for Steel Player Eonmetall,” The Edge Malaysia, February 22, 2023, <https://theedgemalaysia.com/node/655125>;

Fuding, “Home” web page, no date, <https://www.fudingindustries.com/>, retrieved May 24, 2023;

Fuding, “Company Profile” web page, no date, <https://www.fudingindustries.com/about>, retrieved May 24, 2023;

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;

Vietnam News, “Viet Nam Asks Businesses to Keep Close Watch on US Investigation Into Boltless Steel Shelving Imports,” Bizhub, May 25, 2023, http://bizhub.vn/news/viet-nam-asks-businesses-to-keep-close-watch-on-us-investigation-into-boltless-steel-shelving-imports_344542.html; and

Petitioner’s postconference brief, exh. 9: Information on Subject Producers’ Capacity and Export Orientation.

Note: Though the firm did not submit a response to the Commission’s questionnaire, information regarding Malaysian producer Eonmetall is included in the table above. Eonmetall was the only firm in Malaysia preliminarily assigned a de minimis margin by Commerce and was thus generally treated as nonsubject in the prehearing report. However, Eonmetall was assigned an 81.12 percent dumping margin based on adverse facts available by Commerce in its final determination. 89 FR 28736, April 19, 2024.

Changes in operations

Subject producers were asked to report any change in the character of their operations or organization relating to the production of boltless steel shelving since 2020. Two producers indicated in their questionnaires that they had experienced such changes. Table VII-3 presents the changes identified by these producers.

Table VII- 3

Boltless steel shelving: Subject producers' reported changes in operations since January 1, 2020, by firm

Item	Firm name and accompanying narrative response
Plant openings	***
Prolonged shutdowns	***
Weather-related or force majeure events	***

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

Operations on boltless steel shelving

Table VII-4 presents data on subject producers' installed capacity, practical overall capacity, and practical boltless steel shelving capacity and production on the same equipment. Between 2020 and 2022, two firms, Fuding and Quoc Ham, reported installed overall capacity and practical overall capacity. Quoc Ham reported *** from 2020-22. Fuding first reported capacity ***.

Neither firm reported *** from 2020-22, nor production of other products on the same equipment and machinery used to produce boltless steel shelving. Quoc Ham reported that both installed overall capacity and practical overall capacity were *** between January-September ("interim") 2022 and interim 2023, while Fuding reported *** installed overall capacity and *** in practical overall capacity between interim 2022 and interim 2023.⁷

Between 2020 and 2022, subject producers' installed overall capacity increased by *** percent and practical overall capacity (which matches practical boltless steel shelving

⁷ ***.

capacity in all periods) increased by *** percent, from *** units to *** units. Installed overall capacity was *** between interim 2022 and interim 2023, while practical overall capacity was *** percent lower in interim 2023 than in interim 2022.

Installed overall capacity utilization decreased by *** percentage points and practical overall capacity utilization decreased by *** percentage points between 2020 and 2022. They were both lower in interim 2023 compared to interim 2022.

Table VII-4

Boltless steel shelving: Subject producers' installed and practical capacity and production on the same equipment as in-scope production, by period

Capacity and production in units; utilization in percent

Item	Measure	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical BSS	Capacity	***	***	***	***	***
Practical BSS	Production	***	***	***	***	***
Practical BSS	Utilization	***	***	***	***	***

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

Table VII-5 presents subject producers' reported capacity constraints since January 1, 2020.

Table VII-5

Boltless steel shelving: Subject producers' reported capacity constraints since January 1, 2020

Item	Firm name and narrative response on constraints to practical overall capacity
Logistics/transportation	***
Other constraints	***
Other constraints	***
Storage capacity	***

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

Table VII-6 presents information on the boltless steel shelving operations of the responding subject producers and exporters. Subject producers' production decreased by *** percent during 2020-21 and then increased by *** percent during 2021-22, increasing overall by *** percent between 2020 and 2022. Production was *** percent lower in interim 2023 than in interim 2022 and is projected to be *** percent lower in 2024 than in 2023.

*** reported home market shipments (either internal consumption or commercial shipments) in any period. Subject producers' exports to the United States increased irregularly by *** percent during 2020-22, decreasing by *** percent during 2020-21 then increasing by *** percent during 2021-22. They were *** percent lower in interim 2023 than in interim 2022 and were projected to be *** percent lower in 2024 than in 2023. *** reported export shipments to any other market than the United States.

Table VII-6
Boltless steel shelving: Data on subject industries, by period

Quantity in units; ratio and share in percent

Item	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023	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 subject industries, by period

Quantity in units; ratio and share in percent

Item	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023	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 "---".

Table VII-7 presents information on the boltless steel shelving operations of the responding producers/exporters by subject country.

*** practical boltless steel shelving capacity or production was reported in Thailand ***.

Practical capacity and production in Thailand was *** percent lower in interim 2023 than in interim 2022 for both measures, and was also projected to be *** percent lower in 2024 than in 2023 for both measures. Capacity utilization was *** percent in all periods.

Practical boltless steel shelving capacity for the producer in Vietnam was *** from 2020-22, and between interim 2022 and interim 2023. Projected capacity in 2023 and 2024 was reported as being *** to capacity from 2020-22. Production of boltless steel shelving in Vietnam decreased by *** percent from 2020-22, and was *** percent lower in interim 2023 than in interim 2022. Production was projected to be *** percent lower in 2023 than in 2022, before being projected to decline to *** units in 2024. Capacity utilization decreased by *** percentage points from 2020-22, and was *** percentage points lower in interim 2023 than in interim 2022. Capacity utilization was projected to be *** percentage points lower in 2023 than in 2022, before being projected to decline to *** percent in 2024.

From 2020-21, *** reported production data. After Fuding started reported production ***, it accounted for *** percent of boltless steel shelving production in 2022, while the producer in Vietnam accounted for *** percent. The share of production for the producer in Thailand was *** in interim 2023 than in interim 2022, relative to the share of production accounted for by the producer in Vietnam. In 2024, the producer in Thailand is projected to account for *** percent of production.

Table VII-7
Boltless steel shelving: Subject producers' output: Practical capacity, by source and period

Capacity in units

Foreign industry	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023	Projection 2023	Projection 2024
Malaysia	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***
Thailand, subject	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All reporting subject producers	***	***	***	***	***	***	***

Table continued.

Table VII-7 Continued
Boltless steel shelving: Subject producers' output: Production, by source and period

Production in units

Foreign industry	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023	Projection 2023	Projection 2024
Malaysia	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***
Thailand, subject	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All reporting subject producers	***	***	***	***	***	***	***

Table continued.

Table VII-7 Continued**Boltless steel shelving: Subject producers' output: Practical capacity utilization, by source and period**

Capacity utilization ratio in percent

Foreign industry	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023	Projection 2023	Projection 2024
Malaysia	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***
Thailand, subject	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All reporting subject producers	***	***	***	***	***	***	***

Table continued.

Table VII-7 Continued**Boltless steel shelving: Subject producers' output: Share of production, by source and period**

Share of production in percent

Foreign industry	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023	Projection 2023	Projection 2024
Malaysia	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***
Thailand, subject	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All reporting subject producers	***	***	***	***	***	***	***

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

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

Table VII-8 presents export data of the responding subject producers. *** of the responding producers' reported exports were *** to the United States in every period. Exports of boltless steel shelving to the United States from subject sources increased by *** percent overall from 2020-22. The producer in Thailand started exporting ***. Exports to the United States from Vietnam decreased by *** percent from 2020-22, and were *** percent lower in interim 2023 than in interim 2022. Exports to the United States from Vietnam were projected to be *** by 2024.

Table VII-8**Boltless steel shelving: Subject producers' exports: Quantity of exports to the United States, by source and period**

Quantity in units

Foreign industry	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023	Projection 2023	Projection 2024
Malaysia	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***
Thailand, subject	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All reporting subject producers	***	***	***	***	***	***	***

Table continued.

Table VII-8 Continued**Boltless steel shelving: Subject producers' exports: Share of exports to the United States out of total shipments, by source and period**

Share of total shipments in percent

Foreign industry	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023	Projection 2023	Projection 2024
Malaysia	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***
Thailand, subject	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All reporting subject producers	***	***	***	***	***	***	***

Table continued.

Table VII-8 Continued**Boltless steel shelving: Subject producers' exports: Quantity of total exports, by source and period**

Quantity in units

Foreign industry	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023	Projection 2023	Projection 2024
Malaysia	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***
Thailand, subject	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All reporting subject producers	***	***	***	***	***	***	***

Table continued.

Table VII-8 Continued

Boltless steel shelving: Subject producers' exports: Share of total exports out of total shipments, by source and period

Share of total shipments in percent

Foreign industry	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023	Projection 2023	Projection 2024
Malaysia	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***
Thailand, subject	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All reporting subject producers	***	***	***	***	***	***	***

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, Vietnam was the leading subject exporter for certain metal furniture to the United States during 2022, accounting for 62.0 percent, followed by Taiwan, accounting for 21.0 percent of the total from all subject exporters (table VII-9).

Table VII-9
Certain Metal Furniture: Exports from subject trade partners, by period

Value in 1,000 dollars; share in percent

Exporter	Measure	Destination market	2020	2021	2022
Malaysia	Value	United States	54,842	55,685	54,080
Taiwan	Value	United States	413,368	416,295	288,879
Thailand	Value	United States	173,434	203,033	178,285
Vietnam	Value	United States	533,090	743,857	852,019
Subject exporters	Value	United States	1,174,735	1,418,870	1,373,264
Malaysia	Value	All destination markets	116,542	119,388	135,565
Taiwan	Value	All destination markets	677,193	717,490	523,232
Thailand	Value	All destination markets	206,129	229,380	203,749
Vietnam	Value	All destination markets	752,403	1,051,602	1,185,181
Subject exporters	Value	All destination markets	1,752,267	2,117,860	2,047,727
Malaysia	Share of value	United States	4.7	3.9	3.9
Taiwan	Share of value	United States	35.2	29.3	21.0
Thailand	Share of value	United States	14.8	14.3	13.0
Vietnam	Share of value	United States	45.4	52.4	62.0
Subject exporters	Share of value	United States	100.0	100.0	100.0

Source: Official export statistics under HS subheading 9403.20 as reported by various national statistical authorities in the Global Trade Atlas Suite, accessed December 28, 2023.

Note: These data are overstated as the HS subheading contains products outside the scope of this investigation. Global trade data cannot be separated by subject vs nonsubject suppliers.

U.S. inventories of imported merchandise

Table VII-10 presents data on U.S. importers' reported inventories of boltless steel shelving. U.S. importers' inventories of imports from subject sources increased by *** percent during 2020-22. However, inventories of imports from subject sources were *** percent lower in interim 2023 compared to interim 2022.

The ratio of U.S. importers' inventories to U. S. shipments of imports from subject sources increased by *** percentage points from 2020-22, and was *** percentage points higher in interim 2023 than in interim 2022.

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

Quantity in units; ratio in percent

Measure	Source	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
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, subject	***	***	***	***	***
Ratio to imports	Thailand, subject	***	***	***	***	***
Ratio to U.S. shipments of imports	Thailand, subject	***	***	***	***	***
Ratio to total shipments of imports	Thailand, subject	***	***	***	***	***
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	***	***	***	***	***

Table continued.

Table VII-10 Continued**Boltless steel shelving: U.S. importers' inventories and their ratio to select items, by source and period**

Quantity in units; ratio in percent

Measure	Source	2020	2021	2022	Jan-Sep 2022	Jan-Sep 2023
Inventories quantity	India	***	***	***	***	***
Ratio to imports	India	***	***	***	***	***
Ratio to U.S. shipments of imports	India	***	***	***	***	***
Ratio to total shipments of imports	India	***	***	***	***	***
Inventories quantity	Thailand, nonsubject	***	***	***	***	***
Ratio to imports	Thailand, nonsubject	***	***	***	***	***
Ratio to U.S. shipments of imports	Thailand, nonsubject	***	***	***	***	***
Ratio to total shipments of imports	Thailand, nonsubject	***	***	***	***	***
Inventories quantity	All other sources	***	***	***	***	***
Ratio to imports	All other sources	***	***	***	***	***
Ratio to U.S. shipments of imports	All other sources	***	***	***	***	***
Ratio to total shipments of imports	All other sources	***	***	***	***	***
Inventories quantity	Nonsubject	***	***	***	***	***
Ratio to imports	Nonsubject	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject	***	***	***	***	***
Ratio to total shipments of imports	Nonsubject	***	***	***	***	***
Inventories quantity	All import sources	***	***	***	***	***
Ratio to imports	All import sources	***	***	***	***	***
Ratio to U.S. shipments of imports	All import sources	***	***	***	***	***
Ratio to total shipments of imports	All import 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 "---".

U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of boltless steel shelving after September 30, 2023. Six of 12 importers reported such imports. Their reported data is presented in table VII-11. Arranged imports from subject sources accounted for *** percent of such imports.

Table VII-11

Boltless steel shelving: U.S. importers' arranged imports, by source and period

Quantity in units; share in percent

Source	Measure	Oct-Dec 2023	Jan-Mar 2024	Apr-Jun 2024	Jul-Sept 2024	Total
Malaysia	Quantity	***	***	***	***	***
Taiwan	Quantity	***	***	***	***	***
Thailand, subject	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Thailand, nonsubject	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***

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 "---".

Third-country trade actions

Based on available information, boltless steel shelving from Malaysia, Taiwan, Thailand, or Vietnam has not been subject to other antidumping or countervailing duty investigations outside the United States.⁸

⁸ Conference transcript, pp. 88 (Morey), pp. 120–121 (Nagarajan).

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-12). During 2022, China was the top exporter of metal furniture, other than for offices, accounting for 48.9 percent, followed by Germany, accounting for 6.9 percent, Italy, accounting for 3.4 percent, and the Netherlands, accounting for 3.3 percent. The United States accounted for 3.3 percent. Together, these top five exporters accounted for 65.9 percent of all worldwide exports of metal furniture, other than for offices, in that year.

Table VII-12**Certain metal furniture: Global exports by exporter and period**

Quantity in units; share in percent

Exporting country	Measure	2020	2021	2022
United States	Value	636,274	697,823	811,704
Malaysia	Value	116,542	119,388	135,565
Taiwan	Value	677,193	717,490	523,232
Thailand	Value	206,129	229,380	203,749
Vietnam	Value	752,403	1,051,602	1,185,181
Subject exporters	Value	1,752,267	2,117,860	2,047,727
China	Value	10,060,165	12,231,932	11,997,065
Germany	Value	1,392,319	1,750,536	1,691,592
Italy	Value	607,284	798,406	836,323
Netherlands	Value	525,489	712,173	810,690
Canada	Value	404,015	474,756	632,411
Poland	Value	414,038	523,292	575,475
Mexico	Value	182,303	296,611	439,980
Spain	Value	260,640	378,473	409,016
All other exporters	Value	2,898,302	3,808,171	4,262,747
All reporting exporters	Value	19,133,097	23,790,032	24,514,730
United States	Share of value	3.3	2.9	3.3
Malaysia	Share of value	0.6	0.5	0.6
Taiwan	Share of value	3.5	3.0	2.1
Thailand	Share of value	1.1	1.0	0.8
Vietnam	Share of value	3.9	4.4	4.8
Subject exporters	Share of value	9.2	8.9	8.4
China	Share of value	52.6	51.4	48.9
Germany	Share of value	7.3	7.4	6.9
Italy	Share of value	3.2	3.4	3.4
Netherlands	Share of value	2.7	3.0	3.3
Canada	Share of value	2.1	2.0	2.6
Poland	Share of value	2.2	2.2	2.3
Mexico	Share of value	1.0	1.2	1.8
Spain	Share of value	1.4	1.6	1.7
All other exporters	Share of value	15.1	16.0	17.4
All reporting exporters	Share of value	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 9403.20 as reported by various national statistical authorities in the Global Trade Atlas Suite, accessed December 28, 2023.

Note: United States is shown at the top followed by subject exporters, and all remaining top exporting countries in descending order of 2022 data. These data are overstated as the HS subheading contains products outside the scope of this investigation. Global trade data cannot be separated by subject vs nonsubject suppliers.

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
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>	https://www.govinfo.gov/content/pkg/FR-2023-05-02/pdf/2023-09278.pdf
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>	https://www.govinfo.gov/content/pkg/FR-2023-05-03/pdf/2023-09394.pdf
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>	https://www.govinfo.gov/content/pkg/FR-2023-05-19/pdf/2023-10778.pdf
88 FR 63063, May 19, 2023	<i>Boltless Steel Shelving Units Prepackaged for Sale From India, Malaysia, Taiwan, Thailand and the Socialist Republic of Vietnam: Postponement of Preliminary Determinations in the Less- Than-Fair-Value Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2023-09-14/pdf/2023-19896.pdf
88 FR 83382, November 29, 2023	<i>Boltless Steel Shelving Units Prepackaged for Sale From Taiwan: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final</i>	https://www.govinfo.gov/content/pkg/FR-2023-11-29/pdf/2023-26229.pdf

Citation	Title	Link
	<i>Determination, and Extension of Provisional Measures</i>	
88 FR 83386, November 29, 2023	<i>Boltless Steel Shelving Units Prepackaged for Sale From Malaysia: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2023-11-29/pdf/2023-26232.pdf
88 FR 83389, November 29, 2023	<i>Boltless Steel Shelving Units Prepackaged for Sale From Thailand: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2023-11-29/pdf/2023-26230.pdf
88 FR 83392, November 29, 2023	<i>Boltless Steel Shelving Units Prepackaged for Sale From the Socialist Republic of Vietnam: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2023-11-29/pdf/2023-26231.pdf
88 FR 83395, November 29, 2023	<i>Boltless Steel Shelving Units Prepackaged for Sale From India: Preliminary Negative Determination of Sales at Less Than Fair Value and Postponement of Final Determination</i>	https://www.govinfo.gov/content/pkg/FR-2023-11-29/pdf/2023-26233.pdf
88 FR 85914, December 11, 2023	<i>Boltless Steel Shelving Units Prepackaged for Sale From India, Malaysia, Taiwan, Thailand, and Vietnam; Scheduling of the Final Phase of Antidumping Duty Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2023-12-11/pdf/2023-27151.pdf

Citation	Title	Link
89 FR 62, January 2, 2024	<i>Boltless Steel Shelving Units Prepackaged for Sale From Thailand: Amended Preliminary Determination of Sales at Less-Than-Fair-Value</i>	https://www.govinfo.gov/content/pkg/FR-2024-01-02/pdf/2023-28824.pdf
89 FR 4591, January 24, 2024	<i>Boltless Steel Shelving Units Prepackaged for Sale From Thailand: Preliminary Affirmative Determination of Sales at Less Than Fair Value and Amended Preliminary Determination of Sales at Less Than Fair Value; Correction</i>	https://www.govinfo.gov/content/pkg/FR-2024-01-24/pdf/2024-01277.pdf
89 FR 28736, April 19, 2024	<i>Boltless Steel Shelving Units Prepackaged for Sale From Malaysia: Final Affirmative Determination of Sales at Less- Than-Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2024-04-19/pdf/2024-08374.pdf
89 FR 28738, April 19, 2024	<i>Boltless Steel Shelving Units Prepackaged for Sale From Thailand: Final Affirmative Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2024-04-19/pdf/2024-08373.pdf
89 FR 28741, April 19, 2024	<i>Boltless Steel Shelving Units Prepackaged for Sale From Taiwan: Final Affirmative Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2024-04-19/pdf/2024-08372.pdf
89 FR 28743, April 19, 2024	<i>Boltless Steel Shelving Units Prepackaged for Sale From the Socialist Republic of Vietnam: Final Affirmative Determination of Sales at Less- Than-Fair-Value</i>	https://www.govinfo.gov/content/pkg/FR-2024-04-19/pdf/2024-08370.pdf
89 FR 28746, April 19, 2024	<i>Boltless Steel Shelving Units Prepackaged for Sale From India: Final Negative Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2024-04-19/pdf/2024-08371.pdf

Citation	Title	Link
89 FR 33395, April 29, 2024	<i>Boltless Steel Shelving Units Prepackaged for Sale From India: Termination of investigation</i>	https://www.govinfo.gov/content/pkg/FR-2024-04-29/pdf/2024-09121.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: Boltless Steel Shelving Units Prepackaged for Sale from India, Malaysia, Taiwan, Thailand, and Vietnam

Inv. Nos.: 731-TA-1607-1611 (Final)

Date and Time: April 11, 2024 - 9:30 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 the Imposition (**Kathleen W. Cannon**, Kelley Drye & Warren 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, Data Analyst, Georgetown Economic Services, LLC

Kathleen W. Cannon)
Joshua R. Morey)
) – OF COUNSEL
Elizabeth C. Johnson)
Jacob M. Reiskin)

CLOSING REMARKS:

In Support of the Imposition (**Kathleen W. Cannon**, Kelley Drye & Warren LLP)

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			
	Calendar year		Jan-Sep			Comparison years			Jan-Sep
	2020	2021	2022	2022	2023	2020-22	2020-21	2021-22	2022-23
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Importers' share (fn1):									
Malaysia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Taiwan.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Thailand, subject.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Vietnam.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
India.....	***	***	***	***	***	▲***	***	▲***	▲***
Thailand, nonsubject.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. consumption value:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Importers' share (fn1):									
Malaysia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Taiwan.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Thailand, subject.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Vietnam.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
India.....	***	***	***	***	***	▲***	***	▲***	▲***
Thailand, nonsubject.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. importers' U.S. shipments of imports from:									
Malaysia:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Taiwan:									
Quantity.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Thailand, subject:									
Quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Vietnam:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Subject sources:									
Quantity.....	1,285,725	2,030,862	1,822,862	1,465,094	654,438	▲41.8	▲58.0	▼(10.2)	▼(55.3)
Value.....	84,470	116,979	131,294	102,432	65,547	▲55.4	▲38.5	▲12.2	▼(36.0)
Unit value.....	\$66	\$58	\$72	\$70	\$100	▲9.6	▼(12.3)	▲25.0	▲43.3
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
India:									
Quantity.....	***	***	***	***	***	▲***	***	▲***	▲***
Value.....	***	***	***	***	***	▲***	***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Thailand, nonsubject:									
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			
	Calendar year		Jan-Sep			Comparison years			Jan-Sep
	2020	2021	2022	2022	2023	2020-22	2020-21	2021-22	2022-23
U.S. importers' U.S. shipments of imports from: Continued									
All other sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Nonsubject sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
All import sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
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 (unit 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.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Total assets.....	***	***	***	***	***	▼***	▼***	▼***	***

Source: Compiled from data submitted in response to Commission questionnaires. Thailand, subject represents all firms in Thailand except Siam Metal. All import sources data are based on U.S. importers' U.S. shipments of imports. 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

NONSUBJECT SOURCE PURCHASE COST DATA

Purchase cost data for nonsubject merchandise are comparable to those presented in tables V-8 to V-11 for domestic and subject sources. Purchase cost and quantity data are shown in tables D-1 to D-2 and in figures D-1 to D-2.

In comparing nonsubject purchase cost data from India with U.S. producer pricing data, LDP values for nonsubject imports from India were lower than prices for U.S.-produced products in *** instances (***) (table D-3). In comparing nonsubject purchase cost data from Thailand with U.S. producer pricing data, LDP values for nonsubject imports from Thailand were lower than prices for U.S.-produced products in *** instances (***) (table D-3).

Table D-1

Boltless steel shelving: Import landed duty-paid purchase costs and domestic prices, quantities of product 1, and price-cost differentials, by quarter

Price and unit LDP value in dollars per unit, quantity in units, differential in percent.

Period	U.S. price	U.S. quantity	India unit LDP value	India quantity	India 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	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***

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

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-8.

Figure D-1

Boltless steel shelving: Import landed duty-paid purchase costs and domestic prices, quantities of product 1, by quarter

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

* * * * *

Volume of product 1

* * * * *

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

Note: Product 1: 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 D-2

Boltless steel shelving: Import landed duty-paid purchase costs and domestic prices, quantities of product 3, and price-cost differentials, by quarter

Price and unit LDP value in dollars per unit, quantity in units, differential in percent.

Period	U.S. price	U.S. quantity	Thailand, nonsubject unit LDP value	Thailand, nonsubject quantity	Thailand, nonsubject 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	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***

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

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-10.

Note: "Thailand, nonsubject" refers to all imports of boltless steel shelving from Siam Metal Tech Co., Ltd. *** submitted supplemental information to its importers' questionnaire with *** data for *** specific to Siam Metal.

Figure D-2

Boltless steel shelving: Import landed duty-paid purchase costs and domestic prices, quantities of product 3, by quarter

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

* * * * *

Volume of product 3

* * * * *

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

Note: Product 3: 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 D-3

Boltless steel shelving: Summary of higher/(lower) unit values for nonsubject price and purchase cost data, by source, January 2020 – September 2023

Quantity in units

Comparison source	Benchmark source	Number of quarters lower	Quantity lower	Number of quarters higher	Quantity higher
India cost	United States price	***	***	***	***
India cost	Subject prices	***	***	***	***
India cost	Subject purchase cost	***	***	***	***
Thailand, nonsubject cost	United States price	***	***	***	***
Thailand, nonsubject cost	Subject prices	***	***	***	***
Thailand, nonsubject cost	Subject purchase cost	***	***	***	***

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

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

Note: Please see Part V for subject price and purchase cost data.

Note: “Thailand, nonsubject” refers to all imports of boltless steel shelving from Siam Metal Tech Co., Ltd. *** submitted a supplemental information to its importers’ questionnaire with *** data for *** specific to Siam Metal.

