

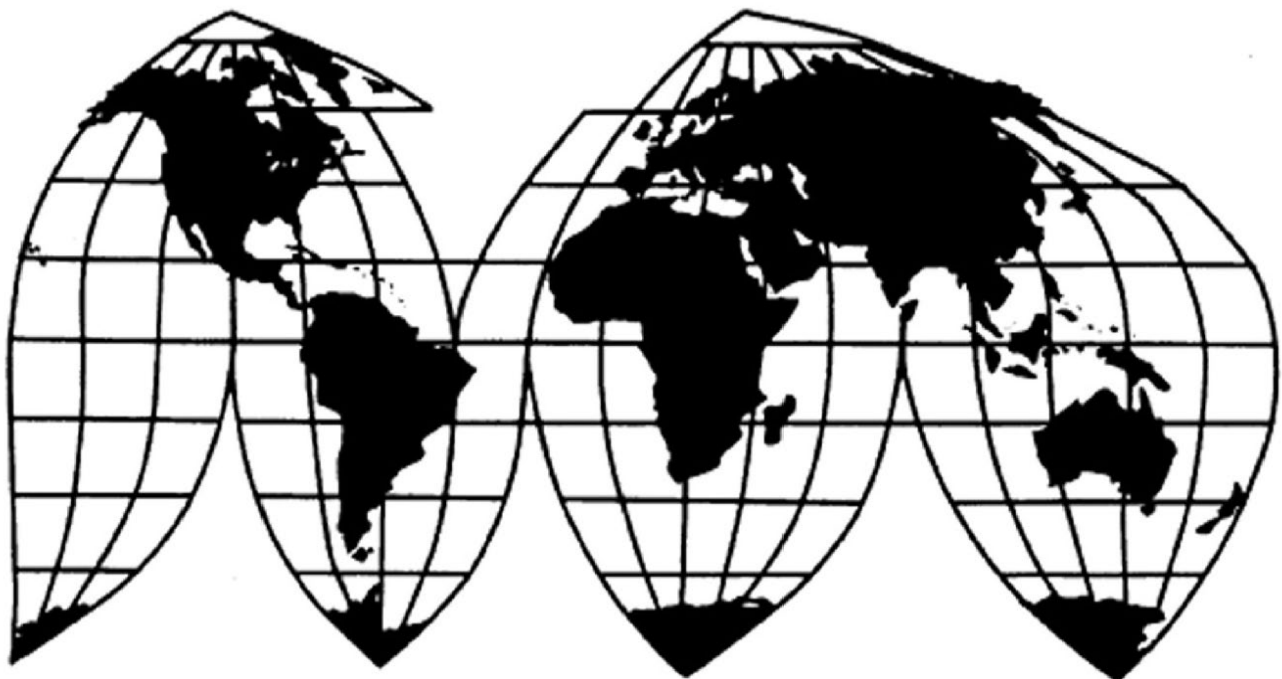
Fiberglass Door Panels from China

Investigation Nos. 701-TA-758 and 731-TA-1739 (Preliminary)

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U.S. International Trade Commission



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Note.—Information that would reveal confidential operations of individual firms may not be published. Such information is identified by brackets ([]) in confidential reports and is deleted and replaced with asterisks (***) in public reports. Zeroes, null values, and undefined calculations are suppressed and shown as em dashes (—) in tables. If using a screen reader, we recommend increasing the verbosity setting.

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-758 and 731-TA-1739 (Preliminary)

Fiberglass Door Panels from China

DETERMINATIONS

On the basis of the record¹ developed in the subject investigations, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of fiberglass door panels from China, provided for in subheading 3925.20.00 of the Harmonized Tariff Schedule of the United States, that are alleged to be sold in the United States at less than fair value (“LTFV”) and imports of the subject merchandise from China that are alleged to be subsidized by the government of China.²

COMMENCEMENT OF FINAL PHASE INVESTIGATIONS

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

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

² 90 FR 15684 and 15692 (April 15, 2025).

who are parties to the investigations. As provided in section 207.20 of the Commission's rules, the Director of the Office of Investigations will circulate draft questionnaires for the final phase of the investigations to parties to the investigations, placing copies on the Commission's Electronic Document Information System (EDIS, <https://edis.usitc.gov>), for comment.

BACKGROUND

On March 20, 2025, the American Fiberglass Door Coalition, the members of which are Therma-Tru Corporation, Maumee, Ohio, Plastpro Doors Inc., Los Angeles, California, and Owens Corning, Toledo, Ohio, filed petitions with the Commission and Commerce, alleging that an industry in the United States is materially injured or threatened with material injury by reason of subsidized imports of fiberglass door panels from China and LTFV imports of fiberglass door panels from China. Accordingly, effective March 20, 2025, the Commission instituted countervailing duty investigation No. 701-TA-758 and antidumping duty investigation No. 731-TA-1739 (Preliminary).

Notice of the institution of the Commission's investigations and of a public conference to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* of March 26, 2025 (90 FR 13778). The Commission conducted its conference on April 10, 2025. All persons who requested the opportunity were permitted to participate.

Views of the Commission

Based on the record in the preliminary phase of these investigations, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of fiberglass door panels that are allegedly sold in the United States at less than fair value and subsidized by the government of China.

I. The Legal Standard for Preliminary Determinations

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

II. Background

Parties to the Investigation. The American Fiberglass Door Coalition (“Petitioner” or “Coalition”), a coalition consisting of Therma-Tru Corporation (“Therma-Tru”), Plastpro Doors, Inc. (“Plastpro”), and Owens Corning, domestic producers of fiberglass door panels, filed the petitions in these investigations on March 20, 2025. Representatives of the three firms in the Coalition participated in the staff conference accompanied by counsel and submitted a postconference brief.³

Two respondent entities Trinity Glass International, Inc. (“Trinity Glass”), a U.S. importer of subject merchandise, and its affiliated supplier Dalian Capstone Engineering Co., Ltd.,

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

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

³ American Fiberglass Door Coalition’s Postconference Brief, EDIS Doc. 848806 (Apr. 15, 2025) (“Coalition Postconference Brief”).

appeared at the staff conference accompanied by counsel and submitted a postconference brief.⁴

Data Coverage. U.S. industry data are based on the questionnaire responses of four domestic producers, which accounted for virtually all known U.S. production of fiberglass door panels in 2024.⁵ U.S. import data are based on usable questionnaire responses from 25 importers, estimated to have accounted for the majority of subject imports in 2024.⁶ The Commission received responses to its questionnaires from three Chinese producers of subject merchandise, accounting for approximately *** percent of fiberglass door panels production in China in 2024, and whose exports accounted for all known subject imports from China in 2024.⁷

III. Domestic Like Product

In determining whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of imports of the subject merchandise, the Commission first defines the “domestic like product” and the “industry.”⁸ 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.”⁹ 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.”¹⁰

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 the U.S.

⁴ Trinity Glass’s and Dalian Capstone Engineering Co., Ltd.’s, Postconference Brief, EDIS Doc. 848813 (Apr. 15, 2025) (“Respondents’ Postconference Brief”). No representatives from Dalian Capstone Engineering Co., Ltd., appeared at the staff conference.

⁵ Confidential Report, Memorandum INV-XX-054 (Apr. 28, 2025) (“CR/PR”) at 3.1; Public Report, *Fiberglass Door Panels from China*, Inv. Nos. 701-TA-758 & 731-TA-1739 (Preliminary), USITC Pub. 5623 (May 2025) (“PR”) at 3.1. One of the four responding U.S. producers, ***, provided usable production data, but not usable financial data. *Id.* at 3.1 n.2, 6.1 n.2. Petitioner had identified two firms, ***, as being U.S. producers, and estimates that they accounted for *** percent of U.S. production, but neither firm submitted a domestic producer questionnaire response. *Id.* at 3.1 n.3.

⁶ CR/PR at 4.1 & Table 4.1. The Commission sent questionnaires to 80 firms believed to be U.S. importers of fiberglass door panels. *Id.* Of those firms, ten reported that they had not imported fiberglass door panels since January 1, 2022. *Id.* at 4.1 n.2.

⁷ CR/PR at 7.3 & Table 7.1.

⁸ 19 U.S.C. § 1677(4)(A).

⁹ 19 U.S.C. § 1677(4)(A).

¹⁰ 19 U.S.C. § 1677(10).

Department of Commerce ("Commerce").¹¹ 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."¹² The Commission then defines the domestic like product in light of the imported articles Commerce has identified.¹³ The decision regarding the appropriate domestic like product(s) in an investigation is a factual determination, and the Commission has applied the statutory standard of "like" or "most similar in characteristics and uses" on a case-by-case basis.¹⁴ No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.¹⁵ The Commission looks for clear dividing lines among possible like products and disregards minor variations.¹⁶ The Commission may, where

¹¹ 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).

¹² *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).

¹³ *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).

¹⁴ *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).

¹⁵ *See, e.g., S. Rep. No. 96-249 at 90-91 (1979).*

¹⁶ *See, e.g., Nippon*, 19 CIT at 455; *Torrington*, 747 F. Supp. at 748-49; *see also S. Rep. No. 96-249 at 90-91* (Congress has indicated that the like product standard should not be interpreted in "such a narrow fashion as to permit minor differences in physical characteristics or uses to lead to the conclusion that the product and article are not 'like' each other, nor should the definition of 'like product' be interpreted in such a fashion as to prevent consideration of an industry adversely affected by the imports under consideration.").

appropriate, include domestic articles in the domestic like product in addition to those described in the scope.¹⁷

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

The merchandise covered by this investigation consists of fiberglass door panels, including fiberglass sidelites whether finished or unfinished, whether assembled or unassembled, whether prehung or included in an entry door system. The subject fiberglass door panels consist of at least one fiberglass skin, frames typically made of wood or composite stiles, bottom rails, and top rails, binding materials, including adhesives or fasteners, insulation foam, and may be assembled with glass lites (glass that is ultimately installed in the fiberglass door panel). Fiberglass sidelites (or “sidelights”) are typically smaller in width than fiberglass door panels, and consist of at least one fiberglass skin, frames typically made of wood or composite stiles, bottom rails, and top rails, binding materials, including adhesives or fasteners, insulation foam, and may be assembled with glass lites (glass that is ultimately installed in the fiberglass sidelite). Subject merchandise includes fiberglass door panels and sidelites whether the fiberglass skin surface is painted or unpainted, contains or does not contain cut-outs for door components, or assembled or unassembled with glass lites in the door.

Fiberglass door panels and sidelites are covered by the investigation whether they are imported attached to, or in conjunction with door components and accessories (including but not limited to door jambs, door handles, locks, hinges, door stoppers, door kicks, door thresholds, door sills, and trim), in a prehung door system, or an entry door system. Subject fiberglass door panels and sidelites are covered whether or not they are accompanied by other parts. However, if a subject fiberglass door panel or sidelite is imported in a pre-hung door system or entry

¹⁷ See, e.g., *Pure Magnesium from China and Israel*, Inv. Nos. 701-TA-403 and 731-TA-895-96 (Final), USITC Pub. 3467 at 8 n.34 (Nov. 2001); *Torrington*, 747 F. Supp. at 748-49 (holding that the Commission is not legally required to limit the domestic like product to the product advocated by the petitioner, co-extensive with the scope).

door system, only the fiberglass door panel and sidelite, including when assembled with glass lites or when the glass lites are shipped with the subject merchandise for further assembly, are covered by the scope. Door components and accessories (including but not limited to transoms, door jambs, door handles, locks, hinges, door stoppers, door kicks, door thresholds, door sills, and trim) are not included in the scope when imported with a fiberglass door panel or sidelite, including when such components or accessories are assembled to a fiberglass door panel or sidelite, or when imported separately. Subject merchandise may be impact-rated to withstand hurricane force wind loads and may be reinforced with steel sheet or plate. Impact-rated doors may be certified to Testing Application Standards (TAS) 201/202/203–94/and American Society for Testing and Materials (ASTM) E330–02/14/M–14, E1886–05/13a/, or E1996–09/14a.

Subject merchandise may be fire-rated for up to 90 minutes and may contain flame retardant composites, including, but not limited to flame retardant foam or mineral core materials, including but not limited to low density calcium silicate. Fire-rated doors generally satisfy the National Fire Protection Association (NFPA) 252 Standard Methods of Fire Tests of Door Assemblies and UL10(b) and (c)-Standard for Safety-Fire Tests of Door Assemblies. Subject merchandise also includes fiberglass door panels and sidelites that have been processed in a third country, including but not limited to one or more of the following: filling with insulation foam, trimming, cutting, notching, punching, drilling, painting, finishing, assembly, or any other processing that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture of the in-scope product. The inclusion of other parts, such as door components and accessories (including but not limited to door jambs, door handles, locks, hinges, door stoppers, door kicks, door thresholds, door sills, and trim) in a third country does not remove the fiberglass door panels and sidelites from the scope.

Excluded from the scope of this investigation are all products covered by the scope of the antidumping duty and countervailing duty orders on wood mouldings and millwork products from China. See *Wood Mouldings and Millwork Products from the People's Republic of China: Amended Final Antidumping Duty Determination and Antidumping Duty Order*, 86 FR 9486 (February 16, 2021); and *Wood Mouldings and Millwork Products from the People's Republic of China: Countervailing Duty Order*, 86 FR 9484 (February 16, 2021).

Excluded from the scope of this investigation are all products covered by the scope of the antidumping duty and countervailing duty proceedings on float glass products from China. See *Float Glass Products from the People's Republic of China and Malaysia: Initiation of Less-Than-Fair-Value Investigations*, 90 FR 1435 (January 8, 2025); and *Float Glass Products from the People's Republic of China and Malaysia: Initiation of Countervailing Duty Investigations*, 90 FR 1443 (January 8, 2025).

Imports of subject merchandise are classified under Harmonized Tariff Schedule of the United States (HTSUS) statistical number 3925.20.0010. Subject merchandise may also be classified under 4418.29.4000, 4418.29.8030, 4418.29.8060, or 7019.90.5150. The HTSUS subheadings are provided for convenience and customs purposes; the written description of the scope of this investigation is dispositive.¹⁸

Fiberglass door panels and sidelites (or “sidelights”),¹⁹ whether solid or with glass inserts, are designed for permanent installation as exterior or entry doors.²⁰ Fiberglass door panels are primarily used in residential and mixed-use buildings but can also be used in certain

¹⁸ *Fiberglass Door Panels from the People's Republic of China: Initiation of Less-Than-Fair-Value Investigation*, 90 Fed. Reg. 15684, 15688-15689 (Apr. 15, 2025) (“LTFV Notice of Initiation”). The scope of the countervailing duty investigation is identical. *Fiberglass Door Panels from the People's Republic of China: Initiation of Countervailing Duty Investigation*, 90 Fed. Reg. 15692, 15695-15696 (Apr. 15, 2025) (“CVD Notice of Initiation”); CR/PR at 1.5-1.6.

¹⁹ Fiberglass sidelites are assemblies containing at least one fiberglass skin that are smaller in width than a fiberglass door panel. CR/PR at 1.8 n.16; Transcript of Preliminary Conference, EDIS Doc. 848627 (April 10, 2025) (“Conference Tr.”) at 57-58 (Mr. Dotson).

²⁰ CR/PR at 1.8.

non-residential buildings, such as barns, sheds, and storage buildings. Fiberglass door panels, including sidelites, have the following main components: (1) fiberglass “skins;”²¹ (2) frames; (3) an insulated core; and, (4) (if they have glass inserts) glass.²² The fiberglass “skins” can have different surfaces and textures, and may be painted or unpainted, stained or unstained, and finished or unfinished.²³ Fiberglass door panels reportedly require little maintenance, are long-lasting, lightweight, and water-resistant and enhance energy efficiency.²⁴ The panels may be impact-rated to withstand hurricane force wind loads (reinforced with steel sheet or plate) or fire-rated (containing flame retardant composites) for up to 90 minutes.²⁵

Fiberglass door panels are manufactured by using heat and pressure to convert sheet molded compound (“SMC”)²⁶ into fiberglass door skins with the desired forms (such as a six-panel door) and textures (such as a pattern that resembles hardwood grain).²⁷ The fiberglass door skins are then attached to a door frame with adhesives and glues, and glass may be inserted.²⁸ Inserting glass during the manufacturing process creates flush-glazed or direct-glaze fiberglass door panels and sidelites (*i.e.*, they don’t have raised moldings with the screw holes).²⁹ The product’s core is then filled with an expandable insulating foam, such as polyurethane foam, and it is sealed with a plug.³⁰ Some doors have cutouts for door accessories.³¹ Some fiberglass door panel manufacturers are vertically integrated and finish, assemble, and package their own product, which is then shipped to the customer. Others sell door panels to a door fabricator or prehanger for final finishing and assembly.³²

²¹ Fiberglass “skins” are the outermost layers that cover a door’s core. CR/PR at 1.9-1.10.

²² CR/PR at 1.8; Conference Tr. at 22 (Mr. Dotson).

²³ CR/PR at 1.8; Conference Tr. at 22-23 (Mr. Dotson).

²⁴ CR/PR at 1.8.

²⁵ CR/PR at 1.8.

²⁶ Conference Tr. at 96 (Dotson) (describing SMC as “a mixture, kind of like a dough” that is “basically a combination of some resins, some proprietary fillers, but it really is glass strand and resin”); *see also* CR/PR at 5.1 (describing the composition of SMC raw materials).

²⁷ CR/PR at 1.10; Conference Tr. at 22 (Mr. Dotson) (explaining the process to manufacture fiberglass door panels).

²⁸ CR/PR at 1.10; Conference Tr. at 22 (Mr. Dotson). A door frame typically consists of door styles, a top and bottom door rail, and a wooden lock block. CR/PR at 1.10.

²⁹ Conference Tr. at 22 & 121 (Mr. Dotson); *id.* at 185 (Mr. Nonemaker); *id.* at 202-203 (Mr. Nonemaker & Mr. So).

³⁰ CR/PR at 1.10; Conference Tr. at 22 (Mr. Dotson).

³¹ CR/PR at 1.10.

³² CR/PR at 1.10; Conference Tr. at 22-23 (Mr. Dotson).

A. Arguments of the Parties

Petitioner's Arguments. Petitioner argues that the Commission's traditional domestic like product factors support defining a single domestic like product consisting of all fiberglass door panels, coextensive with the scope.³³

Respondents' Arguments. Respondents did not raise arguments concerning the definition of the domestic like product in these preliminary phase investigations.³⁴

B. Analysis

Based on the record in these preliminary phase investigations, and in the absence of any contrary argument, we define a single domestic like product consisting of all fiberglass door panels, coextensive with Commerce's scope.

Physical Characteristics and Uses. The record indicates that, although there are some differences in size and design, all in-scope fiberglass door panels, which includes fiberglass sidelites, share the same general physical characteristics and uses.³⁵ All fiberglass door panels contain the following main components: (1) fiberglass "skins"; (2) frames; (3) an insulated foam core, and (4) (if they have glass inserts) glass.³⁶ Fiberglass door panels are intended for permanent installation in a building, primarily as exterior or entry doors for residential single-family and multi-family homes.³⁷ They are suited to outdoor use because they are designed to withstand certain baseline environmental strains and impacts, such as heat, cold, weather, and physical impact.³⁸

³³ Petition, EDIS Doc. 846262 (March 20, 2025), volume I at 25-26; Coalition Postconference Brief at Ex. 1 at 24-27.

³⁴ Conference Tr. at 176-77 (Mr. Nicely).

³⁵ Petition, volume I at 25; Conference Tr. at 65 (Mr. Brightbill) ("[A]ll of these products, whether they are subject imports or domestic[ally produced], share the same physical characteristics . . . they are designed in the same way for exterior use, residential construction and renovation."); *id.* at 44 (Dr. Kaplan).

³⁶ Petition, volume I at 25; Conference Tr. at 101 (Mr. Tull) (explaining that domestic and subject imports "contain the exact same construction and/or {polyurethane} foam"); Coalition Postconference Brief at Ex. 1 at 25; CR/PR at 1.8.

³⁷ Petition, volume I at 25; Conference Tr. at 68 (Mr. Jaskiewicz) (explaining that the "vast majority" of fiberglass doors are "primarily used in a single-family residential applications"). Fiberglass door panels can also be used in door entry systems that permit entry from the garage to the home, as well as in non-residential applications, including, but not limited to, sheds and barn doors. Petition, volume I at 25 & n.48.

³⁸ Petition, volume I at 25; CR/PR at 1.8.

Interchangeability. The record evidence indicates that fiberglass door panels are produced to the same standard dimensions, and that fiberglass door panels of the same dimensions are generally interchangeable.³⁹

Producer and Customer Perceptions. The available evidence indicates that producers and customers perceive that all fiberglass door panels are part of a single continuum of products that can be used for the same end use applications.⁴⁰

Channels of Distribution. During the January 1, 2022-December 31, 2024, period of investigation (“POI”), domestic producers sold fiberglass door panels through three primary channels of distribution: (1) distributors/dealers; (2) retailers, including door stores and big box home improvement stores such as Lowes and Home Depot; and (3) direct end users, including builders, contractors, and homeowners.⁴¹ Distributors/dealers and retailers ultimately sell fiberglass door panels to end users, including builders, contractors, and homeowners.⁴²

Manufacturing Facilities, Production Processes, and Production Employees. The evidence on the record indicates that fiberglass door panels regardless of source are all manufactured in the same manufacturing facilities, using the same production processes and employees.⁴³ The commonality of the production processes, facilities, employees, and equipment is not dependent upon the specific size or style of the panel or whether it is later assembled with door components or as full pre-hung doors.⁴⁴

Price. The record indicates that fiberglass door panels that contain glass have a price premium.⁴⁵ Petitioner contends that prices can overlap based on the amount of fabrication,

³⁹ Petition, volume I at 25; Conference Tr. at 69 (Mr. Tull) (“You can take the panel from almost any of these manufacturers and interchange them in the same door unit.”); *id.* at 70 (Mr. Dotson) (explaining that door systems are generally made to standard specifications); Coalition Postconference Brief at Ex. 1 at 25.

⁴⁰ Coalition Postconference Brief at Ex. 1 at 26.

⁴¹ Conference Tr. at 26-27 (Mr. Fein); *id.* at 32 (Mr. Tull); *id.* at 39 (Mr. Jaskiewicz); Coalition Postconference Brief at Ex. 1, 25-26. Throughout the POI, domestic producers sold between 83.1 and 83.8 percent of their U.S. shipments to distributors, between 7.1 percent and 7.9 percent to retailers, between 0.6 and 0.7 percent to builders/contractors, and between 7.9 and 9.1 percent to other end users. CR/PR at Table 2.1.

⁴² Coalition Postconference Brief at Ex. 1 at 25.

⁴³ Petition, volume I at 25; Conference Tr. at 44 (Dr. Kaplan) (“There’s two specifications which these products are made to. They use the same production methods{.}”); *id.* at 144-45 (Mr. Dotson); Coalition Postconference Brief at Ex. 1 at 26.

⁴⁴ Coalition Postconference Brief at Ex. 1 at 26.

⁴⁵ The U.S. producer and importer questionnaires requested pricing data for four products. CR/PR at 5.6. Pricing data indicate that prices on a weighted-average f.o.b basis for domestically-produced product 1 fluctuated between \$*** and \$*** per unit, product 2 between \$*** and \$*** per (Continued...)

and that the continuum typically extends from a solid fiberglass door panel on the lower end, to a fiberglass door panel with some glass in the middle, and a fiberglass door panel with full glass towards the higher end.⁴⁶

Conclusion. For the preliminary phase of these investigations, the Commission defines a single domestic like product consisting of all fiberglass door panels coextensive with the scope. Although there are some differences in design and shape and whether glass is inserted, all fiberglass door panels consist of the same key components (fiberglass skins, frames, and an insulated core) and are designed for exterior use in residential construction and renovation, including the ability to withstand certain environmental and weather conditions and physical impact. Similarly, all domestically produced fiberglass door panels are generally interchangeable when produced to the same dimensions. They are all sold through the same primary channels of distribution, namely distributor fabricators, dealer fabricators, and retailers. Domestically-produced fiberglass door panels are also produced using the same manufacturing processes, facilities, and employees. There are some differences in price based upon whether the fiberglass door panels contain glass; however, it is not apparent from the record that those price differences constitute clear dividing lines between fiberglass door panels that contain glass and those that do not.

In light of these facts and in the absence of any contrary arguments, we define a single domestic like product consisting of fiberglass door panels, coextensive with the scope.⁴⁷

unit, product 3 between \$*** and \$*** per unit, and product 4 between \$*** and \$*** per unit. *Id.* at Tables 5.4 through 5.7. Although there is a gap between the price ranges for these products, pricing data account for *** percent of U.S. producers' U.S. shipments, and may not have captured products in the middle of the range. *Id.* at 5.7. Pricing products 1 and 2 do not contain glass but pricing products 3 and 4, which are priced higher, contain glass. CR/PR at 5.6 & Tables 5.4 through 5.7.

⁴⁶ Petition, volume I at 26 & n.52 (citing *Certain Aluminum Extrusion from China*, Inv. Nos. 701-TA-475 and 731-TA-1177, USITC Pub. 4677 (Mar. 2017) (Review) at 29); *id.* at Ex. I-20; Coalition Postconference Brief at Ex. 1 at 26-27; Conference Tr. at 23 (Mr. Dotson) (explaining that "high-end fiberglass door panels . . . could have one of several finishes, glass features, or glass design options"). Here, products 1 and 2 do not contain glass and are at the lower end of the range, and products 3 and 4 contain glass and are priced higher. CR/PR at 5.6 & Tables 5.4 through 5.7.

⁴⁷ The Commission's questionnaires also asked producers and importers to compare fiberglass door panels with medium-density fiberboard, wood, and steel door panels. CR/PR at Tables 1.4 through 1.6; Coalition Postconference Brief at Ex. 1 at 27-33. No party has requested the inclusion of any of these products in the definition of the domestic like product, and we are not aware of evidence on the record in the preliminary phase of these investigations that would warrant considering inclusion of these products. We remind the parties to indicate in their comments on the draft questionnaires in any final phase of the investigations whether they intend to raise a domestic like product argument, including the proposed definition of the domestic like product, or for us to consider a further like product, and the grounds for such an argument. 19 C.F.R. § 207.20(b).

IV. Domestic Industry

The domestic industry is defined as the domestic “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”⁴⁸ 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.

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.⁴⁹ Exclusion of such a producer is within the Commission’s discretion based upon the facts presented in each investigation.⁵⁰

C. Arguments of the Parties

Petitioner’s Arguments. Petitioner contends that the Commission should define the domestic industry as including all producers of fiberglass door panels and fiberglass sidelites. It argues that appropriate circumstances do not exist for the Commission to exclude domestic

⁴⁸ 19 U.S.C. § 1677(4)(A).

⁴⁹ 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).

⁵⁰ The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

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

producer *** from the domestic industry.⁵¹ In addition, Petitioner asserts that companies that solely fabricate or assemble U.S. produced fiberglass door panels should not be included in the definition.⁵²

Respondents' Arguments. Respondents did not raise any arguments concerning the definition of the domestic industry in these preliminary phase investigations.

D. Analysis and Recommendation

*** imported subject merchandise during the POI, and therefore is subject to possible exclusion under the related parties provision. We accordingly address whether appropriate circumstances exist to exclude *** from the domestic industry. *** is *** and was the *** domestic producer in 2024, accounting for *** percent of reported domestic production.⁵³ *** imports of subject merchandise were *** units in 2022, *** units in 2023, and *** units in 2024.⁵⁴ The firm's domestic production was *** units in 2022, *** units in 2023, and *** units in 2024.⁵⁵ The ratio of the firm's imports of subject merchandise to its domestic production was less than *** percent in 2024, which was the only year that it imported subject merchandise.⁵⁶ *** reported its reasons for importing as ***.⁵⁷

Conclusion. Since the ratio of *** subject imports to its domestic production was extremely low, and *** is ***, its primary interest appears to be in domestic production and not in importation of subject merchandise. There is also no record information indicating that *** imports of subject merchandise benefited its domestic production operations such that its inclusion in the domestic industry would skew industry data or mask injury. Therefore, in the

⁵¹ Coalition Postconference Brief at Ex. 1 at 21-22. Petitioner asserts that although *** did not submit a U.S. producer questionnaire, its importer questionnaire response suggests that it could also be a producer. Coalition Postconference Brief at Ex. 1 at 22. Petitioner does not take a position as to whether, if *** produces the domestic like product and imports subject merchandise, it should be excluded from the domestic industry. *Id.* However, even if *** is a related U.S. producer and appropriate circumstances existed for its exclusion, it did not file a domestic producer questionnaire response in these investigations, so there is no company-specific data to be excluded from the aggregate data for the domestic industry. CR/PR at 3.1 n.3. Accordingly, the Commission need not determine the related party status of *** or whether appropriate circumstances exist for its exclusion for purposes of these preliminary phase investigations.

⁵² Coalition Postconference Brief at Ex. 1 at 5-17.

⁵³ CR/PR at Table 3.1.

⁵⁴ CR/PR at 3.16; *id.* at Table 3.14.

⁵⁵ CR/PR at Table 3.7.

⁵⁶ CR/PR at 3.16.

⁵⁷ CR/PR at Table 3.15.

absence of any contrary argument, we do not find that appropriate circumstances exist to exclude *** from the domestic industry.

Accordingly, we define the domestic industry as all domestic producers of fiberglass door panels and fiberglass sidelites.

V. Negligible Imports

Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product that account for less than 3 percent of all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition shall be deemed negligible.⁵⁸ In the case of countervailing duty investigations involving a developing country (as designated by the United States Trade Representative), the statute indicates that the negligibility limit is 4 percent rather than 3 percent.⁵⁹

Based on the Commission's questionnaire data, during the 12-month period preceding filing of the petition (March 2024 to February 2025), subject imports from China accounted for 55.7 percent of total fiberglass door panel imports.⁶⁰ Because subject imports exceed the three percent negligibility threshold, we find that imports of fiberglass door panels from China subject to the antidumping and countervailing duty investigations are not negligible.

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

E. Legal Standard

In the preliminary phase of antidumping and countervailing duty investigations, the Commission determines whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.⁶¹ 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

⁵⁸ 19 U.S.C. §§ 1671b(a), 1673b(a), 1677(24)(A)(i), 1677(24)(B).

⁵⁹ 19 U.S.C. § 1677(24)(B). China is not designated by USTR as a developing country for purposes of the 4 percent negligibility limit. *See Designations of Developing Countries and Least Developed Countries Under the Countervailing Duty Law*, 85 Fed. Reg. 7613, 7615 (USTR Feb. 10, 2020).

⁶⁰ CR/PR at Table 4.7. The volume of imports from China subject to the antidumping and countervailing duty investigations is the same.

⁶¹ 19 U.S.C. §§ 1671b(a), 1673b(a).

operations.⁶² The statute defines “material injury” as “harm which is not inconsequential, immaterial, or unimportant.”⁶³ In assessing whether there is a reasonable indication that the domestic industry is materially injured by reason of subject imports, we consider all relevant economic factors that bear on the state of the industry in the United States.⁶⁴ 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.”⁶⁵

Although the statute requires the Commission to determine whether there is a reasonable indication that the domestic industry is “materially injured or threatened with material injury by reason of” unfairly traded imports,⁶⁶ 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.⁶⁷ 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.⁶⁸

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

⁶² 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).

⁶³ 19 U.S.C. § 1677(7)(A).

⁶⁴ 19 U.S.C. § 1677(7)(C)(iii).

⁶⁵ 19 U.S.C. § 1677(7)(C)(iii).

⁶⁶ 19 U.S.C. §§ 1671b(a), 1673b(a).

⁶⁷ *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).

⁶⁸ 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).

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.⁶⁹ In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.⁷⁰ 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.⁷¹ It is clear that the existence of injury caused by other factors does not compel a negative determination.⁷²

⁶⁹ The Uruguay Round Agreements Act Statement of Administrative Action, H. Doc. 103-316 (1994) (“SAA”) states at 851-52 (“{T}he Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.”); S. Rep. 96-249 at 75 (1979) (the Commission “will consider information which indicates that harm is caused by factors other than less-than-fair-value imports.”); H.R. Rep. 96-317 at 47 (1979) (“in examining the overall injury being experienced by a domestic industry, the ITC will take into account evidence presented to it which demonstrates that the harm attributed by the petitioner to the subsidized or dumped imports is attributable to such other factors;” those factors include “the volume and prices of nonsubsidized imports or imports sold at fair value, contraction in demand or changes in patterns of consumption, trade restrictive practices of and competition between the foreign and domestic producers, developments in technology and the export performance and productivity of the domestic industry”); *accord* *Mittal Steel*, 542 F.3d at 877.

⁷⁰ 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.”).

⁷¹ S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

⁷² *See* *Nippon Steel Corp.*, 345 F.3d at 1381 (“an affirmative material-injury determination under the statute requires no more than a substantial-factor showing. That is, the ‘dumping’ need not be the sole or principal cause of injury.”).

Assessment of whether material injury to the domestic industry is “by reason of” subject imports “does not require the Commission to address the causation issue in any particular way” as long as “the injury to the domestic industry can reasonably be attributed to the subject imports.”⁷³ The Commission ensures that it has “evidence in the record” to “show that the harm occurred ‘by reason of’ the LTFV imports,” and that it is “not attributing injury from other sources to the subject imports.”⁷⁴ The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed “rigid adherence to a specific formula.”⁷⁵

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.⁷⁶ Congress has delegated this factual finding to the Commission because of the agency’s institutional expertise in resolving injury issues.⁷⁷

F. Conditions of Competition and the Business Cycle

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

⁷³ *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*.

⁷⁴ *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.

⁷⁵ *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.”).

⁷⁶ We provide in our discussion below a full analysis of other factors alleged to have caused any material injury experienced by the domestic industry.

⁷⁷ *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.”).

1. Captive Production

The domestic industry captively consumes a portion of its production of fiberglass door panels in the production of downstream articles.⁷⁸ We therefore consider the applicability of the statutory captive production provision, and whether to focus our analysis primarily on the merchant market when assessing market share and the factors affecting the financial performance of the domestic industry.⁷⁹

*** are petitioning Coalition members and are the *** domestic producers of fiberglass door panels.⁸⁰ *** producers reported internal consumption of fiberglass door panels for the production of downstream pre-hung door systems.⁸¹

Threshold Criterion. The provision can be applied only if, as a threshold matter, significant production of the domestic like product is internally transferred and significant production is sold in the merchant market. In these investigations, the domestic industry's merchant market sales accounted for between *** and *** percent of its total U.S. shipments

⁷⁸ CR/PR at 3.13. While Petitioner indicates that *** captively consume a sizeable share of their production, neither Petitioner nor Respondent argues that the conditions for application of the captive production provision are met.

⁷⁹ The captive production provision, 19 U.S.C. § 1677(7)(C)(iv), as amended by the Trade Preferences Extension Act of 2015 ("TPEA"), provides:

(iv) CAPTIVE PRODUCTION – If domestic producers internally transfer significant production of the domestic like product for the production of a downstream article and sell significant production of the domestic like product in the merchant market, and the Commission finds that–

(I) the domestic like product produced that is internally transferred for processing into that downstream article does not enter the merchant market for the domestic like product, and

(II) the domestic like product is the predominant material input in the production of that downstream article;

then the Commission, in determining market share and the factors affecting financial performance set forth in clause (iii), shall focus primarily on the merchant market for the domestic like product.

The SAA indicates that where a domestic like product is transferred internally for the production of another article coming within the definition of the domestic like product, such transfers do not constitute internal transfers for the production of a "downstream article" for purposes of the captive production provision. SAA at 853.

⁸⁰ CR/PR at 1.1, 1.3 & Table 3.1.

⁸¹ CR/PR at 3.13; *see generally* Conference Tr. at 23 (Mr. Dotson) ("What we consider to be a pre-hung door is typically comprised of a fiberglass door panel, frame, hinges, a threshold or sill, weather stripping, and a door sweep.").

of fiberglass door panels during the POI, while its internal consumption accounted for between *** and *** percent of such shipments.⁸² As indicated below, we consider that whether or not the threshold criterion is met, the first statutory criterion is not met and therefore the captive production provision does not apply for purposes of these preliminary phase investigations.

First Statutory Criterion. The first criterion tests whether the domestic like product that is internally transferred for processing into downstream articles does not enter the merchant market for the domestic like product.⁸³ *** reported diverting between *** percent of fiberglass door panels intended for internal consumption to the merchant market in each year from 2022 to 2024.⁸⁴ Accordingly, we find that the first statutory criterion of the captive production would not be satisfied for purposes of these preliminary investigations.

In light of the above, and in the absence of any contrary argument, we determine that the captive production provision does not apply. Nevertheless, we consider the domestic industry's internal transfers to be a relevant condition of competition, and intend to consider further in any final phase of these investigations how such transfers may affect conditions of competition in the U.S. market.

2. Demand Conditions

U.S. demand for fiberglass door panels depends on the demand for U.S.-produced exterior door systems, usually for residential homes.⁸⁵ Fiberglass door panels are sold to distributors, retailers, builders, contractors, and other end users.⁸⁶

U.S. demand for fiberglass door panels is cyclical and typically follows trends in residential construction and remodeling and general U.S. economic conditions.⁸⁷ Both parties assert that, prior to the POI, the COVID-19 pandemic led to increased demand for housing and

⁸² CR/PR at 3.13 and Table 3.9. The average unit values of the domestic industry's merchant market sales and internal transfers increased and decreased at roughly the same rates during the POI, which suggests that a more focused analysis on the merchant market is likely unnecessary. *Id.* at Tables 3.9 & C.2.

⁸³ See Memorandum GC-WW-129 at V-21 to V-23; *Raw Flexible Magnets from China and Taiwan*, Inv. Nos. 701-TA-452 and 731-TA-1129–1130 (Preliminary), USITC Pub. 3961 at 13 (Nov. 2007) (“No producer reported diverting raw flexible magnets intended for internal consumption to the merchant market.”).

⁸⁴ CR/PR at 3.13.

⁸⁵ CR/PR at 2.8.

⁸⁶ CR/PR at 2.3 & Table 2.1.

⁸⁷ Coalition Postconference Brief at 6 & n.17 (citing Conference Tr. at 29 (Mr. Fein)); Conference Tr. at 45 (Dr. Kaplan) (explaining that “{d}emand is cyclical and uncertain” and that it is “based on housing starts”); Respondents’ Postconference Brief at 2-3 & Exs. 1-3; CR/PR at 2.1, 2.6 & 2.8.

remodeling projects.⁸⁸ Growth rates were high in 2022, but slowed in 2023, and began to recover in 2024.⁸⁹ Apparent U.S. consumption of fiberglass door panels decreased from *** units in 2022 to *** units in 2023, and then increased to *** units in 2024, for an overall decrease of *** percent.⁹⁰

Responding U.S. producers and importers had mixed responses regarding U.S. demand during the POI. One U.S. producer and 14 importers reported an increase (either steady or fluctuating) in U.S. demand for fiberglass door panels during the POI, while one U.S. producer and five importers reported no change in domestic demand, and two U.S. producers and four importers reported a decrease (either steady or fluctuating) in domestic demand.⁹¹

The parties' projections of demand differ. Petitioner predicts that demand will decrease, while Respondents forecast that the market will *** in 2025 and that future shipments ***.⁹²

3. Supply Conditions

During the POI, the domestic industry accounted for the largest share of the U.S. market, although it lost market share to subject imports during that time. The industry's share of overall apparent U.S. consumption decreased irregularly, increasing from *** percent in 2022 to *** percent in 2023, and decreasing to *** percent in 2024, for an overall decline of *** percentage points.⁹³

The Commission received usable questionnaire responses from four U.S. producers. *** accounted for the largest share of U.S. production in 2024 at *** percent, followed by *** at *** percent, *** at *** percent, and *** at *** percent.⁹⁴

⁸⁸ Coalition Postconference Brief at 6-7; Respondents' Postconference Brief at 2.

⁸⁹ CR/PR at 2.1 & 2.8; Conference Tr. at 128 (Mr. Jaskiewicz) (explaining that "our demand has been relatively flat for the last couple of years, the last few years in North America").

⁹⁰ CR/PR at Table 4.8; *id.* at 4.11.

⁹¹ CR/PR at 2.8 & Table 2.5.

⁹² Petitioner anticipates that future demand for fiberglass door panels will "cool considerably" given the predictions for a global recession. Coalition Postconference Brief at 7 & n.24 (citing *id.* at Exs. 9-10). Petitioner expects that new construction will slow because of cost increases and that demand for remodeling activity will decline or remain flat. *Id.* at 7-8 & nn.25-28. Respondents predict that the entry door market will *** in 2025 with a *** in shipments. Respondents' Postconference Brief at 3 (citing Exs. 1 & 4).

⁹³ CR/PR at 4.11 & Table 4.8.

⁹⁴ CR/PR at Table 3.1.

One producer entered into a new partnership during the POI, two others acquired new facilities, and several curtailed production.⁹⁵ U.S. producers' U.S. shipments declined irregularly by *** percent over the POI, falling from *** units in 2022 to *** units in 2023, before increasing to *** units in 2024.⁹⁶ The domestic industry internally consumed *** percent of its U.S. shipments in 2022, *** percent in 2023, and *** percent in 2024.⁹⁷

The domestic industry's practical capacity remained essentially unchanged at *** units throughout the POI.⁹⁸ The domestic industry's capacity utilization declined irregularly by *** percentage points over the POI, falling from *** percent in 2022 to *** percent in 2023, and increasing to *** percent in 2024.⁹⁹

The market share of subject imports increased by *** percentage points over the POI, increasing from *** percent in 2022 to *** percent in 2023 and *** percent in 2024.¹⁰⁰

The market share of nonsubject imports declined irregularly by *** percentage points over the POI, falling from *** percent in 2022 to *** percent in 2023, and then rising slightly to

⁹⁵ CR/PR at Tables 3.3 & 3.4. Petitioner Therma-Tru partnered with Larson, Inc., a U.S. manufacturer of storm doors, in January 2022 to provide an integrated storm and entry door system. *Id.* at Table 3.3. In terms of acquisitions, Masonite, a firm that was subsequently acquired by Owens Corning, announced its intent to acquire PGT Innovations, a manufacturer and supplier of high-end windows, doors and garage doors, and Owens Corning acquired Masonite International Corporation in May 2024. *Id.* at Tables 3.3 & 3.4. Petitioner Plastpro acquired Mohawk Fine Paper facility in Ashtabula, County, Ohio, in November 2024. It invested more than \$52 million with the goal of adding 145 jobs and increasing production capacity, in part by adding production capacity for SMC to become more vertically integrated, and to expand the manufacturing site to 1.2 million square feet by November 2026. *Id.* In terms of reductions, since Plastpro acquired its Ohio facility, it has "been forced to pause purchasing the necessary equipment to run the facility" and has had to reduce shifts and "lay off over 50 skilled production workers" because of low-priced Chinese imports. Conference Tr. at 35-36 (Mr. An); *see also* CR/PR at Tables 3.3 & 3.4. *** also reported that ***. *Id.* at Table 3.4. During the staff conference, a representative from Therma-Tru doors reported that low-priced subject imports "caused us to cut production to two shifts and lay off manufacturing team members." Conference Tr. at 24 (Mr. Dotson).

⁹⁶ CR/PR at 3.10 & Table 3.8. *** U.S. producers *** reported export shipments, which accounted for a small share, *** percent, of total shipments over the POI. *Id.* at 3.10. Export shipments fell irregularly by *** percent over the POI, decreasing from *** units in 2022 to *** units in 2023 to *** units in 2024. *Id.* at Table 3.8. Total shipments declined irregularly by *** percent over the POI, decreasing from *** units in 2022 to *** units in 2023, and increasing slightly to *** units in 2024. *Id.* at 3.10 & Table 3.8.

⁹⁷ CR/PR at Table 3.9.

⁹⁸ CR/PR at 3.7 & Tables 3.5 & 3.7. During the staff conference Mr. Dotson from Therma-Tru explained that its increased capacity from 2022 to 2023 resulted from a door line that Therma-Tru had invested in based upon the "demand surge" during the COVID-19 pandemic that "was largely unused in '23 and '24." Conference Tr. at 125 (Mr. Dotson).

⁹⁹ CR/PR at 3.5 & Tables 3.5 & 3.7.

¹⁰⁰ CR/PR at 4.11 & Table 4.8.

*** percent in 2024.¹⁰¹ The largest sources of nonsubject imports during the POI were Canada and Taiwan.¹⁰²

Two of four U.S. producers and 19 of 24 importers reported that they had not experienced supply constraints since January 1, 2022. Of those that reported they had experienced supply constraints, both U.S. producers reported that the constraints only occurred during 2022. Of the importers, five reported that the constraints occurred during 2022, four reported they occurred during 2023, and two reported they occurred during 2024.¹⁰³

4. Substitutability and Other Conditions

We find that there is a moderately high degree of substitutability between subject imports and the domestic like product.¹⁰⁴ All three responding U.S. producers reported that subject imports can always be used interchangeably with the domestic like product.¹⁰⁵ The majority of importers (13 of 20) reported that the subject imports and the domestic like product can always or frequently be used interchangeably, with the remainder reporting that they can only sometimes be used interchangeably.¹⁰⁶ All three responding U.S. producers reported that factors other than price are never significant in comparisons of the domestic like product and subject imports with respect to sales of fiberglass door panels.¹⁰⁷ Conversely, a plurality of responding importers (eight of 19) reported that factors other than price are always

¹⁰¹ CR/PR at 4.11 & Table 4.8.

¹⁰² CR/PR at 2.5.

¹⁰³ CR/PR at 2.5. U.S. producers *** reported that they put purchasers on allocation in 2022 because of long lead times resulting from increased demand during the COVID-19 pandemic. *Id.* at 2.5-2.6.

¹⁰⁴ CR/PR at Table 2.7.

¹⁰⁵ CR/PR at Table 2.7; *see also* Conference Tr. at 43 (Dr. Kaplan) (explaining that “domestic and subject products are highly fungible and interchangeable and substitutable”); *id.* at 28 (Mr. Fein) (explaining that “fiberglass door panels are sold largely on price and are interchangeable for fabricators and installers regardless of source”); *id.* at 39 (Mr. Jaskiewicz) (explaining that low-priced Chinese imports are resulting in “customers shif{ing} more and more of their portfolios to Chinese imports, which offer the same styles of fiberglass door panels as U.S. producers”).

¹⁰⁶ CR/PR at Table 2.7.

¹⁰⁷ CR/PR at Table 2.8; Conference Tr. at 71 (Mr. Fein) (“Over the last two years, the value of those {other factors} has drastically decreased because the gross gap in pricing is too much to account for those other factors.”); *id.* at 72 (Dr. Kaplan) (explaining that many other factors “have equalized and that price is predominant and the price difference makes it predominant plus” and that “price has become the prime mover of why {subject imports} are picking up share”); *id.* at 23 (Mr. Dotson) (“We produce the same styles of doors, door panels, as the Chinese and compete on the basis of price.”); *see also id.* at 145 (Mr. Jaskiewicz) (“So the product ultimately once selected and kind of identified by the customer is going to be {an} apples-to-apples comparison, and the only difference is the 30, 40 percent price difference between us domestic manufacturers versus Chinese imports.”).

important in such comparisons (although an equal number reported that non-price differences are sometimes or never important).¹⁰⁸

We find that price is an important factor in purchasing decisions for fiberglass door panels, along with other factors. U.S. purchasers responding to the domestic producers' lost sales and lost revenue allegations reported that price was among the top three factors that influenced their purchasing decisions, along with quality and availability/supply.¹⁰⁹ Of those factors, quality was the most frequently cited top factor (cited by five firms), followed by availability/supply (three firms), and price (one firm).¹¹⁰

Both the domestic like product and subject imports are primarily sold from inventory. U.S. producers reported that 68.9 percent of their U.S. commercial shipments were sold from inventories in 2024, with lead times averaging 20 days, while 31.1 percent were produced to order, with lead times averaging 33.8 days. Importers reported that 60.1 percent of their U.S. commercial shipments were sold from inventories in 2024, with lead times averaging 23.3 days, and 39.9 percent were produced to order, with lead times averaging 97.8 days.¹¹¹

Both subject imports and the domestic like product were sold primarily under annual contracts. U.S. producers reported that *** percent of their sales were under annual contracts, and such sales constituted *** percent of U.S. importers' sales.¹¹² U.S. producers reported selling *** percent of their commercial shipments through spot sales, while U.S. importers reported selling *** percent under short-term contracts.¹¹³ Domestic producers and importers reported setting prices mostly by using set price lists.¹¹⁴

¹⁰⁸ CR/PR at Table 2.8. There is some evidence that the domestic like product and subject imports offer different features and designs. *E.g.*, CR/PR at 5.32; *see also* Conference Tr. at 166 (Mr. So) ("I don't agree that imported domestic doors compete on the basis of price alone. . . Our doors are preferred by the ultimate consumer not because of their price but because of the features, features that the domestic industry does not offer."); *id.* at 179 (Mr. Nonemaker) (explaining that price is "a factor" but that consumer purchasing decisions are "usually" based on other factors such as design and other features); Respondents' Postconference Brief at Appendix A at 8-11 (citing Exs. 18-19) (providing a more detailed explanation of other factors that drive purchasing decisions).

¹⁰⁹ CR/PR at Table 2.6.

¹¹⁰ CR/PR at Table 2.6. The fourth most important factor was support/communication/service, which was listed as the second most important factor by one purchaser, and the third most important factor by three purchasers. *Id.*

¹¹¹ CR/PR at 2.11.

¹¹² CR/PR at 5.5 and Table 5.3.

¹¹³ CR/PR at 5.5 & Table 5.3.

¹¹⁴ CR/PR at 5.4 & Table 5.2.

Raw material costs accounted for the largest share of the domestic industry's total cost of goods sold ("COGS"), throughout the POI, followed by other factory costs.¹¹⁵ SMC is one of the most important raw materials in the manufacture of fiberglass door panels. It includes many chemical inputs, such that no single input drives the cost of SMC.¹¹⁶ The major other raw materials include wood composite, glass, polyurethane insulation foam, and glues.¹¹⁷ The costs for most of the major raw materials other than SMC generally fluctuated upwards during the POI.¹¹⁸

Effective September 1, 2019, fiberglass door panels and fiberglass sidelites originating in China were subject to an additional 15 percent *ad valorem* duty under section 301 of the Trade Act of 1974.¹¹⁹ Effective February 14, 2020, the section 301 duty for fiberglass door panels and fiberglass sidelites was reduced to 7.5 percent during the POI.¹²⁰

Effective February 4, 2025, fiberglass door panels and fiberglass sidelites originating in China became subject to an additional 10 percent *ad valorem* duty under the International Emergency Economic Powers Act ("IEEPA"),¹²¹ and on March 4, 2025, that additional duty increased to 20 percent *ad valorem*.¹²²

¹¹⁵ CR/PR at 6.11 & Table 6.1. Raw materials as a share of U.S. producers' COGS declined from *** percent in 2022 to *** percent in 2024. *Id.* at 5.1.

¹¹⁶ CR/PR at 5.1. Producers' formulas vary, but most contain at least ***. *Id.*

¹¹⁷ CR/PR at 5.1 & Table 6.4.

¹¹⁸ CR/PR at 5.1, Table 5.1 & Figure 5.1. Glass prices fluctuated upwards through November 2022, and then fluctuated slightly downwards to a price that was 11 percent higher than in January 2022. *Id.* at Table 5.1. Reinforced fiberglass components prices fluctuated upwards throughout the POI, ending at a price that was 27 percent higher than in January 2022. *Id.* Wood product prices, however, fluctuated downwards throughout the POI, ending at a price that was 44.5 percent lower than in January 2022. *Id.* Polyurethane foam prices fluctuated slightly upwards throughout the POI, ending at a price that was 7.2 percent higher than in January 2022. *Id.*

¹¹⁹ 19 U.S.C. § 2411, *et seq.*; *Notice of Modification of Section 301 Action: China's Acts Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 84 Fed. Reg. 45821 (Aug. 30, 2019); Respondents' Postconference Brief at 4-5 & nn.16-19; *see also* CR/PR at 1.7.

¹²⁰ *Notice of Modification of Section 301 Action: China's Acts Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 85 Fed. Reg. 3741 (Jan. 22, 2020); *see also* HTS heading 9903.88.15 and U.S. notes 20(r) and 20(s) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 8, Pub. 5613 (Apr. 2025) at 99.3.106 to 99.3.119, 99.3.354; CR/PR at 1.7.

¹²¹ 50 U.S.C. § 1701, *et seq.*

¹²² Exec. Order No. 14195, 90 Fed. Reg. 9121 (Feb. 7, 2025); Exec. Order No. 14228 (Mar. 3, 2025); *Further Amended Notice of Implementation of Additional Duties on Products of the People's Republic of China Pursuant to the President's Executive Order 14195, Imposing Duties to Address the Synthetic Opioid Supply Chain in the People's Republic of China*, 90 Fed. Reg. 11426 (Mar. 6, 2025); *see also* HTS heading 9903.01.20 and U.S. note 2(s) and HTS heading 9903.01.24 and U.S. note 2(u) to (Continued...)

Separately, effective April 5, 2025, fiberglass door panels and fiberglass sidelites originating in China were subject to an additional 10 percent *ad valorem* duty under IEEPA. That reciprocal duty rose to 84 percent *ad valorem* effective April 9, 2025, and rose again to 125 percent effective April 10, 2025.¹²³

G. 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.”¹²⁴

The volume of subject imports increased irregularly by 25.9 percent during the POI, decreasing from 675,456 units in 2022 to 604,084 units in 2023, and then increasing to 850,661 units in 2024.¹²⁵ Subject imports’ share of apparent U.S. consumption increased by *** percentage points over the POI, increasing from *** percent in 2022 to *** percent in 2023 and to *** percent in 2024.¹²⁶ Subject imports gained market share largely at the expense of the domestic industry, which lost market share to subject imports between 2022 and 2024.¹²⁷ Subject imports as a ratio to domestic production increased from *** percent in 2022 to *** percent in 2023 and to *** percent in 2024.¹²⁸

Based on the foregoing, we find that the volume of subject imports and the increase in that volume are significant in absolute terms and relative to U.S. production and apparent consumption.¹²⁹

subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Rev. 2, Pub. 5590 (Feb. 2025) at 99.3.1, 99.3.278; CR/PR at 1.7.

¹²³ Exec. Order No. 14257, 90 Fed. Reg. 15041 (Apr. 7, 2025); Exec. Order No. 14259, 90 Fed. Reg. 15509 (April 8, 2025); Exec. Order No. 14257, 90 FR 15625 (Apr. 15, 2025); *see also* HTS headings 9903.01.25 and 9903.01.63 and U.S. note 2(v) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Rev. 8, Pub. 5613 (Apr. 2025) at 99.3.1 to 99.3.10, 99.3.278; CR/PR at 1.7.

¹²⁴ 19 U.S.C. § 1677(7)(C)(i).

¹²⁵ CR/PR at 4.3 & Table 4.2. Volume trends for subject imports in the merchant market were largely similar. *Id.* at Table C.2.

¹²⁶ CR/PR at 4.11, Table 4.8.

¹²⁷ CR/PR at 4.11, Table 4.8. The domestic industry lost *** percentage points of market share during the POI. *Id.*

¹²⁸ CR/PR at 4.3.

¹²⁹ Respondents assert that subject imports are sold ***, whereas the domestic industry ***, which “dilute{d} the impact of increased import volumes on the domestic industry.” Respondents’ Postconference Brief at 3-4 & 8. The record indicates, however, that importers sold a large portion of subject imports to distributors. CR/PR at 2.3. Specifically, U.S. importers’ sales to distributors ranged (Continued...)

H. Price Effects of the Subject Imports

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

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

(II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.¹³⁰

As discussed in section VI.B.4 above, we find that there is a moderately high degree of substitutability between subject imports and the domestic like product, and that price is an important factor in purchasing decisions for fiberglass door panels, along with other factors.

The Commission collected quarterly quantity and f.o.b. pricing data on sales of fiberglass door panel products shipped to unrelated U.S. customers during the POI.¹³¹ Three U.S. producers and 10 importers provided usable pricing data for sales of the requested products,

from 30.7 percent to 39.0 percent of their total shipments over the POI, and U.S. importers' sales to retailers ranged from 46.3 percent to 51.7 percent. *Id.* at 2.3 & Table 2.1.

¹³⁰ 19 U.S.C. § 1677(7)(C)(ii).

¹³¹ CR/PR at 5.6. The four pricing products are:

Product 1.-- Six-panel door panel made of fiberglass skins and a foam core, with dimensions of 35 3/4" - 36" wide by 79 - 79 1/4" tall, unglazed, without hinge or bore prep and unfinished, not prehung.

Product 2.-- Two-panel square top door panel made of fiberglass skins and a foam core, with dimensions of 35 3/4" - 36" wide by 79 - 79 1/4" tall, unglazed, without hinge or bore prep and unfinished, not prehung.

Product 3.-- Two-panel Craftsman style door panel with recessed shaker panel made of fiberglass skins and a foam core, flush glazed dual pane Low E insulated glass or clear glass with a dimension of approximately 22"-23" wide by 15-16" tall located at the top of the door panel, with overall door panel dimensions of 35 3/4" - 36" wide by 79-79 1/4" tall, without hinge or bore prep and unfinished, not prehung.

Product 4.-- Full lite flush glazed door made of fiberglass skins and a foam core, flush glazed dual pane Low E insulated glass or clear glass with a dimension of approximately 22-25" wide by 63-65" tall, with an overall door panel dimension of 35 3/4" - 36" wide by 79-79 1/4" tall, without hinge or bore prep and unfinished, not prehung.

Id. Three U.S. producers and nine importers reported quoted prices on a delivered basis, and one U.S. producer and 10 importers reported quoted prices on a f.o.b. basis. *Id.*

although not all firms reported pricing data for all products for all quarters.¹³² The reported pricing data accounted for the following portion of commercial U.S. shipments of fiberglass door panels in 2024 – *** percent for U.S. producers, and *** percent for subject imports from China.¹³³

Subject imports undersold the domestic like product in 44 of 48 quarterly comparisons with margins of underselling ranging from *** to *** percent and averaging *** percent.¹³⁴ Overselling occurred in four quarterly comparisons for product 2 in 2024, with overselling margins ranging from *** percent to *** percent, and averaging *** percent.¹³⁵ There were *** units of subject imports in quarters with underselling compared to the *** units in quarters with overselling.¹³⁶

The Commission also collected import purchase cost data from firms that imported subject merchandise for their own use.¹³⁷ Three importers reported usable import purchase cost data for products 1 through 4 on a landed duty-paid (“LDP”) basis.¹³⁸ Purchase cost data reported by these firms accounted for *** percent of U.S. imports from China in 2024.¹³⁹ LDP costs for subject imports were lower than prices for the domestic like product in 44 quarterly comparisons, at price-cost differentials ranging from *** to *** percent and averaging *** percent, for a total of *** units of subject imports.¹⁴⁰

We recognize that import purchase cost data may not reflect the total cost of importing. Therefore, we requested that importers provide additional information regarding the costs and benefits of directly importing fiberglass door panels.¹⁴¹ Three of 15 responding importers reported that they had incurred additional costs beyond LDP costs by importing fiberglass door panels themselves rather than purchasing from a U.S. producer or U.S. importer.¹⁴² These three importers estimated that total additional cost incurred ranged from 1.0 to 6.0 percent of

¹³² CR/PR at 5.7 & n.4.

¹³³ CR/PR at 5.7.

¹³⁴ CR/PR at 5.29 & Table 5.16.

¹³⁵ CR/PR at Tables 5.16 & 5.17.

¹³⁶ CR/PR at 5.29 & Table 5.16.

¹³⁷ CR/PR at 5.16.

¹³⁸ CR/PR at 5.16.

¹³⁹ CR/PR at 5.16.

¹⁴⁰ CR/PR at 5.30 & Tables 5.18 & 5.19. Subject importers reporting LDP costs imported *** units of subject merchandise in 2022, *** units in 2023, and *** in 2024. *Id.* at Table 5.19. The average price-cost differential was *** percent in 2022, *** percent in 2023, and *** percent in 2024. *Id.*

¹⁴¹ CR/PR at 5.16.

¹⁴² CR/PR at 5.16.

the LDP value, which they attributed to various costs, including tariffs and other customs clearing fees, freight from port to warehouses, and specific policies to cover ocean freight.¹⁴³

Seven of 19 importers reported that they compare costs of importing to the costs of purchasing from a U.S. producer in determining whether to import subject merchandise, and four reported that they also compare costs of importing to the costs of purchasing from another U.S. importer. The remaining eight importers reported that they did not compare costs of importing to costs of purchasing from either U.S. producers or importers.¹⁴⁴

Fifteen importers identified benefits from importing subject merchandise themselves instead of purchasing from U.S. producers or importers, including lower costs.¹⁴⁵ Seven importers estimated that they saved between *** percent of the purchase price by importing fiberglass door panels rather than purchasing from a U.S. producer, and six estimated that they saved between *** percent compared to purchasing from another U.S. importer.¹⁴⁶

We have also considered information from purchasers regarding alleged lost sales. Responding purchasers reported purchasing 5.4 million units of fiberglass door panels during the POI; apparent U.S. consumption during the POI totaled *** units.¹⁴⁷ Of ten responding purchasers, seven reported that, since 2022, they had purchased subject imports instead of U.S.-produced product. Five of those purchasers reported that subject import prices were lower than those of U.S.-produced product, and two of the purchasers reported that price was the primary reason for their decision to purchase subject imports rather than the domestic product.¹⁴⁸ The two purchasers estimated that they had purchased *** units of subject imports instead of the domestic like product on the basis of price, which is equivalent to *** percent of total reported purchases of subject imports and *** percent of U.S. consumption over the POI.¹⁴⁹

Based on the foregoing, including the moderately high degree of substitutability between subject imports and the domestic like product, the importance of price (among other factors) in purchasing decisions for fiberglass door panels, the near universal subject import underselling, the average price-cost differentials, and lost sales information, we find that

¹⁴³ CR/PR at 5.16.

¹⁴⁴ CR/PR at 5.16.

¹⁴⁵ CR/PR at 5.16.

¹⁴⁶ CR/PR at 5.16-5.17.

¹⁴⁷ CR/PR at 5.31, Table 4.8.

¹⁴⁸ CR/PR at 5.32, 5.34 & Table 2.22. Neither of the two purchasers further explained why they had purchased subject imports rather than the domestic product. *Id.* at 5.34, Table 2.22. Other nonprice reasons for purchasing subject imports instead of the domestic product included availability, quality, communication, support, better designs, and more panel sizes. *Id.*

¹⁴⁹ *Derived from* CR/PR at 5.34, Table 2.22, Tables 4.8, 5.20 & C.1.

subject imports significantly undersold the domestic like product during the POI. The underselling by subject imports led subject imports to gain market share over the POI, primarily at the expense of the domestic industry, which lost *** percentage points of market share during the POI.¹⁵⁰

We have also considered whether subject imports depressed or suppressed domestic producer prices to a significant degree during the POI. In general, U.S. producers' prices increased over the POI, with major price increases occurring in the latter half of 2022 and prices for most products remaining relatively stable thereafter.¹⁵¹ Subject import prices also generally increased throughout the POI for all pricing products, with sharp increases in the latter half of 2024 for most products.¹⁵² While both domestic and subject import prices increased over the

¹⁵⁰ CR/PR at 4.8. Respondents argue that only a small volume of subject imports undersold the domestic like product during the POI, which they allege is not discernible from the pricing data due to the limited pricing data for U.S. producers' and U.S. importers' U.S. shipments. Respondents' Postconference Brief at 24-25. However, there is no basis for Respondents' contention that the volume reflected in the pricing data is not representative of the general degree of underselling in the market. Indeed, the underselling data is corroborated by the purchase cost data, as well as responses of purchasers accounting for 40 percent of apparent U.S. consumption over the POI, and half of which reported that subject imports were lower priced than domestic product. *Id.* at 5.32. Separately, Petitioner argues that the actual underselling margins were larger than the data indicate because some importers incorrectly reported the prices of pre-hung doors. Coalition Postconference Brief at 28 & n.130. We invite the parties to submit comments on the draft questionnaires in any final phase of the investigations with respect to how the Commission can improve its pricing data coverage.

¹⁵¹ CR/PR at 5.25, Tables 5.12-5.13 & Figure 5.10. U.S. producers' prices for product 1, which was produced in significantly larger volumes than products 2 through 4 increased overall by *** percent over the POI, ***. *Id.* at Tables 5.12 & 5.13. Prices remained fairly steady with minor fluctuations for the remainder of the POI. *Id.* at Table 5.13. U.S. producers' prices for product 2, which had the *** highest sales volume, increased by *** percent over the POI, ***. *Id.* at Tables 5.12 & 5.13. U.S. producers' prices for product 3, which had the *** sales volume of any domestically produced product, increased overall by *** percent over the POI, ***. *Id.* U.S. producers' prices of product 4 increased overall by *** over the POI, ***. *Id.*

¹⁵² CR/PR at 5.25, Tables 5.12 & 5.14 & Figure 5.11. Subject import prices for product 1, which was imported at a significantly higher volume than any other product increased overall by *** percent over the POI, ***. *Id.* at Tables 5.12 & 5.14. Subject import prices for product 2, which was imported at *** smaller volumes than product 1, increased by *** percent over the POI, with prices ***. *Id.* Subject import prices for product 3, which was imported at *** volumes than product 2 but at *** lower volumes than product 1 increased by *** percent over the POI, ***. *Id.* Subject import prices for product 4, which was imported in the lowest volumes of any product, increased by *** percent over the POI, ***. *Id.*

POI, we note that four of the ten responding purchasers reported that U.S. producers reduced prices in order to compete with lower-priced imports from China during the POI.¹⁵³

The domestic industry's COGS-to-net-sales ratio declined irregularly by *** percentage points over the POI, decreasing from *** percent in 2022 to *** percent in 2023, and then increasing to *** percent in 2024.¹⁵⁴

The domestic industry's unit COGS increased irregularly during the POI, declining from \$*** per unit in 2022 to \$*** per unit in 2023, and then increasing to \$*** per unit in 2024.¹⁵⁵ U.S. producers' net sales unit value increased irregularly over the POI, rising from \$*** per unit in 2022 to \$*** per unit in 2023, and falling to \$*** per unit in 2024.¹⁵⁶ The domestic industry's unit COGS increased by *** or *** percent over the POI, while its net sales unit value increased by *** or *** percent.¹⁵⁷ Thus, the increase in the domestic industry's net sales unit value over the POI was higher than the increase in its unit COGS, on both a per-unit and percentage basis.

In sum, for purposes of these preliminary investigations, we find that subject imports undersold the domestic like product to a significant degree, and as a result gained market share at the expense of the domestic industry. Thus, we find that subject imports had significant price effects.¹⁵⁸

¹⁵³ CR/PR at 5.32 & Table 5.23. Price reductions ranged from *** percent to *** percent. *Id.* at Table 5.23. At the staff conference, U.S. producers and their representatives reported that the domestic industry reduced prices to remain competitive with subject imports. Conference Tr. at 29 (Mr. Fein) ("To remain competitive, we've reduced prices . . ."); *Id.* at 35 (Mr. An) (explaining that in recent years "{w}e have lowered price{s} . . . to compete with {} Chinese import{s}"); *Id.* at 33 (Mr. Tull) (explaining that many domestic producers "tr{ied} to compete by lowering their sales prices" but that they could not lower prices below the cost of production and that "{a}s a result, over the last three years, I have had several customers walk away in favor of the low-priced Chinese product").

¹⁵⁴ CR/PR at Tables 6.1 & C.1.

¹⁵⁵ CR/PR at Tables 6.1 & C.1.

¹⁵⁶ CR/PR at Table 6.1.

¹⁵⁷ *Derived from* CR/PR at Tables 6.1 & C.1.

¹⁵⁸ We note that the domestic industry's prices for all four pricing products *** and that the prices for subject imports for all four pricing products also ***. CR/PR at Table 5.12. In addition, we note that three of four responding domestic producers stated that they had reduced prices because of low-priced subject imports, and of the ten responding purchasers, four reported that U.S. producers had reduced prices in order to compete with lower-priced imports. *Id.* at 5.31-32. In any final phase of these investigations, we intend to examine further whether and to what extent subject imports have impacted U.S. prices during the POI with respect to price depression.

I. Impact of the Subject Imports¹⁵⁹

Section 771(7)(C)(iii) of the Tariff Act provides that the Commission, in examining the impact of the subject imports on the domestic industry, “shall evaluate all relevant economic factors which have a bearing on the state of the industry.” These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debt, research and development, and factors affecting domestic prices. No single factor is dispositive and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”¹⁶⁰

The domestic industry’s capacity remained essentially unchanged at *** units throughout the POI,¹⁶¹ but the domestic industry experienced declines in production, capacity utilization, employment, U.S. shipments, and market share. The industry also experienced declines in several of its financial indicators, as well as its capital expenditures and research and development.

Specifically, the domestic industry’s production declined by *** percent from 2022 to 2024, decreasing from *** units in 2022 to *** units in 2023, and then increasing to *** units in 2024.¹⁶² Capacity utilization declined by *** percentage points from 2022 to 2024, falling from *** percent in 2022 to *** percent in 2023, and then increasing slightly to *** percent in 2024.¹⁶³

The domestic industry’s employment indicators generally declined during the POI. The number of production and related workers (“PRWs”) declined irregularly by *** percent from 2022 to 2024, falling from *** PRWs in 2022 to *** PRWs in 2023, and increasing to *** PRWs in 2024.¹⁶⁴ Hours worked decreased by *** percent from 2022 to 2024, falling from *** hours in 2022 to *** hours in 2023 and to *** hours in 2024.¹⁶⁵ Wages paid declined by *** percent from 2022 to 2024, falling from \$*** in 2022 to \$*** in 2023 and to \$*** in 2024.¹⁶⁶

¹⁵⁹ In its notice initiating the antidumping duty investigation on fiberglass door panels from China, Commerce reported estimated dumping margins ranging from 147.85 to 190.57 percent for subject imports from China. *LTFV Notice of Initiation*, 90 Fed. Reg. at 15687; CR/PR at 1.4.

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

¹⁶¹ CR/PR at Tables 3.5 & C.1.

¹⁶² CR/PR at 3.7 & Tables 3.5 & C.1.

¹⁶³ CR/PR at 3.7 & Tables 3.5 & C.1.

¹⁶⁴ CR/PR at Tables 3.16 & C.1.

¹⁶⁵ CR/PR at Tables 3.16 & C.1.

¹⁶⁶ CR/PR at Tables 3.16 & C.1. Although wages paid declined over the POI, wages paid per hour increased from \$*** in 2022 to \$*** in 2023 to \$*** in 2024. *Id.*

Productivity increased irregularly by *** percent from 2022 to 2024, falling from *** units per 1,000 hours in 2022 to *** units per 1,000 hours in 2023, and then rising sharply to *** units per 1,000 hours in 2024.¹⁶⁷

The domestic industry's end-of-period inventories fell irregularly by *** percent over the POI, decreasing from *** units in 2022 to *** units in 2023, and increasing to *** units in 2024.¹⁶⁸

The domestic industry's U.S. shipments fell irregularly by *** percent over the POI, falling from *** units in 2022 to *** units in 2023, and then rising to *** units in 2024.¹⁶⁹ The domestic industry's market share declined irregularly by *** percentage points during the POI, increasing from *** percent in 2022 to *** percent in 2023, and then falling to *** percent in 2024.¹⁷⁰

The domestic industry's financial indicators also generally declined over the POI. Net sales value declined irregularly by *** percent from 2022 to 2024, declining from \$*** in 2022 to \$*** in 2023, and then rising to \$*** in 2024.¹⁷¹ Net sales quantity also declined irregularly, by *** percent, from 2022 to 2024, falling from *** units in 2022 to *** units in 2023, and then rising to *** units in 2024.¹⁷² Gross profits increased irregularly from 2022 to 2024, rising from \$*** in 2022 to \$*** in 2023, and then falling to \$*** in 2024.¹⁷³ Operating income declined irregularly by *** percent from 2022 to 2024, increasing from \$*** in 2022 to \$*** in 2023, and then decreasing to \$*** in 2024.¹⁷⁴ The industry's ratio of operating income to net sales declined irregularly by *** percentage points from 2022 to 2024, rising from *** percent in 2022 to *** percent in 2023, and falling to *** percent in 2024.¹⁷⁵ Net income declined irregularly by *** percent from 2022 to 2024, rising from \$*** in 2022 to \$*** in 2023, and falling to \$*** in 2024.¹⁷⁶ The industry's ratio of net income to net sales declined by *** percentage points from 2022 to 2024, rising from *** percent in 2022 to *** percent in 2023,

¹⁶⁷ CR/PR at Tables 3.16 & C.1.

¹⁶⁸ CR/PR at 3.15 & Tables 3.13 & C.1.

¹⁶⁹ CR/PR at 3.10, Tables 3.8 & C.1.

¹⁷⁰ CR/PR at 4.11, Tables 4.8 & C.1.

¹⁷¹ CR/PR at 6.11 & Tables 6.1 & C.1.

¹⁷² CR/PR at 6.11 & Tables 6.1 & C.1.

¹⁷³ CR/PR at Tables 6.1 & C.1.

¹⁷⁴ CR/PR at Tables 6.1 & C.1. Respondents argue that operating income declined because of increased SG&A expenses. Respondents' Postconference Brief at 19 & Ex. 10. The record does not appear to support this argument, as the largest increase in the industry's SG&A expenses AUV, from 2022 to 2023, coincided with an increase in the industry's operating income AUV. CR/PR at Table 6.1.

¹⁷⁵ CR/PR at Tables 6.1 & C.1.

¹⁷⁶ CR/PR at 6.14 & Tables 6.1 & C.1.

and falling to *** percent in 2024.¹⁷⁷ Net assets increased by *** percent from 2022 to 2024, rising from \$*** in 2022 to \$*** in 2023 and to \$*** in 2024.¹⁷⁸ Return on assets declined irregularly by *** percent from 2022 to 2024, increasing from *** percent in 2022 to *** percent in 2023, and decreasing to *** percent in 2024.¹⁷⁹

The domestic industry's capital expenditures and research and development expenses also declined over the POI. The domestic industry's capital expenditures decreased by *** percent from 2022 to 2024, falling from \$*** in 2022 to \$*** in 2023 to \$*** in 2024.¹⁸⁰ The industry's research and development expenses decreased *** percent from 2022 to 2024, falling from \$*** in 2022 to \$*** in 2023 and \$*** in 2024.¹⁸¹

Based on the record in the preliminary phase of these investigations, we find that the significant volume of subject imports, which increased by 25.9 percent during the POI, significantly undersold the domestic like product and took market share from the domestic industry.¹⁸² As a result, the domestic industry suffered substantial declines in its production, capacity utilization, employment indicators, capital expenditures, research and development, U.S. shipments, and market share. We note that the domestic industry's production, U.S. shipments, and net sales quantity all declined by more than the rate of decrease in domestic consumption.¹⁸³

Given the declines in the domestic industry's production and shipments as a result of lost market share to low-priced subject imports, the industry's revenues and financial performance were lower than they otherwise would have been, with the industry's operating income falling by *** percent over the POI, and its operating margin declining by *** percentage points.¹⁸⁴

¹⁷⁷ CR/PR at Tables 6.1 & C.1.

¹⁷⁸ CR/PR at 6.16 & Tables 6.9 & C.1.

¹⁷⁹ CR/PR at Table 6.10.

¹⁸⁰ CR/PR at 6.15 & Tables 6.5 & C.1.

¹⁸¹ CR/PR at 6.15 & Tables 6.7 & C.1; Conference Tr. at 115 (Mr. Jaskiewicz) (explaining that low-priced subject imports had prevented Owens Corning from introducing a "fully integrated smart door" that involved a "multi-year, multi-million dollar, very significant investment"); *id.* at 40 (Mr. Jaskiewicz) (discussing Owens Corning's decision to cancel its investment in a smart door because of competition from low-priced subject imports in the third quarter of 2024).

¹⁸² CR/PR at 4.3, 4.11, Tables 4.2, 4.8 & C.1.

¹⁸³ CR/PR at Table C.1. During the POI, production fell by *** percent, U.S. shipments fell by *** percent, and net sales quantity fell by *** percent, all of which were higher than the rate of the decrease in apparent U.S. consumption at *** percent decrease during the POI. *Id.* at 3.7, 3.10, 4.11, 6.11 & Table C.1.

¹⁸⁴ CR/PR at Tables 6.1 & C.1.

We have also considered whether there are other factors that may have had an impact on the domestic industry to ensure that we are not attributing injury from such other factors to subject imports. We recognize that apparent U.S. consumption declined by *** percent over the POI.¹⁸⁵ This decline does not explain the pervasive underselling of domestic fiberglass door panels by subject imports, nor the market share that subject imports took from domestic industry between 2022 and 2024.¹⁸⁶ Moreover, as discussed above, the record shows that the domestic industry suffered declines in key indicators between 2022 and 2024 that were greater than we would expect in light of the magnitude of the decline in apparent U.S. consumption.¹⁸⁷ Thus, the decline in demand does not explain the injury suffered by the domestic industry that we have found to be caused by subject imports.

We have also considered the role of nonsubject imports in these investigations. U.S. shipments of nonsubject imports declined by 17.6 percent between 2022 and 2024, while the market share of nonsubject imports declined by *** percentage points over that period.¹⁸⁸ Thus, nonsubject imports do not explain the domestic industry's loss of market share during the POI and the accompanying decline in its performance discussed above.¹⁸⁹

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

VII. Conclusion

For the reasons stated above, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of subject imports of fiberglass door panels from China that are allegedly subsidized and sold in the United States at less than fair value.

¹⁸⁵ CR/PR at 4.11 & Table 4.8.

¹⁸⁶ CR/PR at 4.11, Tables 4.2 & 4.8. During the POI, subject imports gained *** percentage points of market share at the expense of the domestic industry, which lost *** percentage points. *Id.* at 4.11.

¹⁸⁷ *Derived from* CR/PR at Table C.1; *id.* at 4.11.

¹⁸⁸ CR/PR at 4.11, & Table 4.8. As a percentage of total imports, nonsubject imports declined by 14.9 percent. *Id.* at 4.3.

¹⁸⁹ While there were recent changes to tariffs on subject and nonsubject sources of fiberglass door panels, as well as their inputs, those tariff changes occurred outside the POI of these preliminary phase investigations. In any final phase we will consider any role changes in tariff rates may have had in the U.S. market.

Part 1: Introduction

Background

These investigations result from petitions filed with the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (“USITC” or “Commission”) by the American Fiberglass Door Coalition, the members of which are Therma-Tru Corporation (“Therma-Tru”), Maumee, Ohio; Plastpro Doors Inc. (“Plastpro”), Los Angeles, California; and Owens Corning, Toledo, Ohio, on March 20, 2025, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized and less-than-fair-value (“LTFV”) imports of fiberglass door panels¹ from China. Table 1.1 presents information relating to the background of these investigations.^{2 3}

Table 1.1 Fiberglass door panels: Information relating to the background and schedule of this proceeding

Effective date	Action
March 20, 2025	Petitions filed with Commerce and the Commission; institution of the Commission investigations (90 FR 13778, March 26, 2025)
April 9, 2025	Commerce’s notice of initiation (90 FR 15684 and 15692, April 15, 2025)
April 10, 2025	Commission’s conference
May 2, 2025	Commission’s vote
May 5, 2025	Commission’s determinations
May 12, 2025	Commission’s views

Statutory criteria

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

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

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

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

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

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

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

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.

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

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

Organization of report

Part 1 of this report presents information on the subject merchandise, alleged subsidy rates/dumping margins, and domestic like product. Part 2 of this report presents information on conditions of competition and other relevant economic factors. Part 3 presents information on the condition of the U.S. industry, including data on capacity, production, shipments, inventories, and employment. Parts 4 and 5 present the volume of subject imports and pricing of domestic and imported products, respectively. Part 6 presents information on the financial experience of U.S. producers. Part 7 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

Fiberglass door panels are generally used as exterior or entry doors in residential or mix-used buildings.⁶ The leading U.S. producers of fiberglass door panels are ***, while leading producers of fiberglass door panels outside the United States include *** of China. The leading U.S. importers of fiberglass door panels from China are ***. Leading U.S. importers of fiberglass door panels from nonsubject sources (primarily Canada and Taiwan) include ***. U.S. purchasers of fiberglass door panels are largely distributors, with some being finishers and pre-hangers that sell complete door systems; leading purchasers include ***.

Apparent U.S. consumption of fiberglass door panels totaled approximately *** units (\$***) in 2024. Currently, four firms are known to produce fiberglass door panels in the United States. U.S. producers' U.S. shipments of fiberglass door panels totaled *** units (\$***) in 2024, and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. importers' U.S. shipments of imports from China totaled approximately 757,000 units (\$148.6 million) in 2024 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. importers' U.S. shipments of imports from nonsubject sources totaled approximately 513,000

⁶ Fiberglass door panels may also be used in non-residential applications such as barns, sheds, and storage buildings. Petitions, pp. 6 to 7.

units (\$95.5 million) in 2024 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. The Commission's questionnaires collected data for the years 2022 to 2024. Except as noted, U.S. industry data are based on questionnaire responses of four firms that accounted for the vast majority of U.S. production of fiberglass door panels during 2024. U.S. imports are based on questionnaire responses of 25 firms. Foreign industry data are based on questionnaire responses of three firms.

Previous and related investigations

Fiberglass door panels have not been the subject of prior countervailing or antidumping duty investigations in the United States.

Nature and extent of alleged subsidies and sales at LTFV

Alleged subsidies

On April 15, 2025, Commerce published a notice in the Federal Register of the initiation of its countervailing duty investigation on fiberglass door panels from China.⁷

Alleged sales at LTFV

On April 15, 2025, Commerce published a notice in the Federal Register of the initiation of its antidumping duty investigation on fiberglass door panels from China.⁸ Commerce has initiated an antidumping duty investigation based on estimated dumping margins ranging from 147.85 to 190.57 percent for fiberglass door panels from China.

⁷ For further information on the alleged subsidy programs see Commerce's notice of initiation and related CVD Initiation Checklist. 90 FR 15692, April 15, 2025.

⁸ 90 FR 15684, April 15, 2025.

The subject merchandise

Commerce's scope

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

The merchandise covered by this investigation consists of fiberglass door panels, including fiberglass sidelites, whether finished or unfinished, whether assembled or unassembled, whether pre-hung or included in an entry door system. The subject fiberglass door panels consist of at least one fiberglass skin, frames typically made of wood or composite stiles, bottom rails, and top rails, binding materials, including adhesives or fasteners, insulation foam, and may be assembled with glass lites (glass that is ultimately installed in the fiberglass door panel). Fiberglass sidelites (or "sidelights") are typically smaller in width than fiberglass door panels, and consist of at least one fiberglass skin, frames typically made of wood or composite stiles, bottom rails, and top rails, binding materials, including adhesives or fasteners, insulation foam, and may be assembled with glass lites (glass that is ultimately installed in the fiberglass sidelite). Subject merchandise includes fiberglass door panels and sidelites whether the fiberglass skin surface is painted or unpainted, contains or does not contain cut-outs for door components, or assembled or unassembled with glass lites in the door.

Fiberglass door panels and sidelites are covered by the investigation whether they are imported attached to, or in conjunction with door components and accessories (including but not limited to door jambs, door handles, locks, hinges, door stoppers, door kicks, door thresholds, door sills, and trim), in a pre-hung door system, or an entry door system. Subject fiberglass door panels and sidelites are covered whether or not they are accompanied by other parts. However, if a subject fiberglass door panel or sidelite is imported in a pre-hung door system or entry door system, only the fiberglass door panel and sidelite, including when assembled with glass lites or when the glass lites are shipped with the subject merchandise for further assembly, are covered by the scope. Door components and accessories (including but not limited to transoms, door jambs, door handles, locks, hinges, door stoppers, door kicks, door thresholds, door sills, and trim) are not included in the scope when imported with a fiberglass door panel or sidelite, including when such components or accessories are assembled to a fiberglass door panel or sidelite, or when imported separately. Subject merchandise may be impact-rated to withstand hurricane force wind loads and may be

⁹ 90 FR 15684 and 15692, April 15, 2025

reinforced with steel sheet or plate. Impact-rated doors may be certified to Testing Application Standards (TAS) 201/202/203-94/ and American Society for Testing and Materials (ASTM) E330-02/14/M-14, E1886-05/13a/, or E1996-09/14a.

Subject merchandise may be fire-rated for up to 90 minutes and may contain flame retardant composites, including, but not limited to flame retardant foam or mineral core materials, including but not limited to low density calcium silicate. Fire-rated doors generally satisfy the National Fire Protection Association (NFPA) 252 Standard Methods of Fire Tests of Door Assemblies and UL10(b) and (c)-Standard for Safety-Fire Tests of Door Assemblies.

Subject merchandise also includes fiberglass door panels and sidelites that have been processed in a third country, including but not limited to one or more of the following: filling with insulation foam, trimming, cutting, notching, punching, drilling, painting, finishing, assembly, or any other processing that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture of the in-scope product. The inclusion of other parts, such as door components and accessories (including but not limited to door jambs, door handles, locks, hinges, door stoppers, door kicks, door thresholds, door sills, and trim) in a third country does not remove the fiberglass door panels and sidelites from the scope.

Excluded from the scope of this investigation are all products covered by the scope of the antidumping duty and countervailing duty orders on wood mouldings and millwork products from China. See Wood Mouldings and Millwork Products from the People's Republic of China: Amended Final Antidumping Duty Determination and Antidumping Duty Order, 86 FR 9486 (February 16, 2021); and Wood Mouldings and Millwork Products from the People's Republic of China: Countervailing Duty Order, 86 FR 9484 (February 16, 2021).

Excluded from the scope of this investigation are all products covered by the scope of the antidumping duty and countervailing duty proceedings on float glass products from China. See Float Glass Products from the People's Republic of China and Malaysia: Initiation of Less-Than-Fair-Value Investigations, 90 FR 1435 (January 8, 2025); and Float Glass Products from the People's Republic of China and Malaysia: Initiation of Countervailing Duty Investigations, 90 FR 1443 (January 8, 2025).

Tariff treatment

Based upon the scope set forth by Commerce, information available to the Commission indicates that the merchandise subject to these investigations (fiberglass door panels, including fiberglass sidelites) is imported under Harmonized Tariff Schedule of the United States (“HTS”) statistical reporting number 3925.20.0010.¹⁰ The 2025 general rate of duty for HTS statistical reporting number 3925.20.0010 is 5.3 percent ad valorem. HTS statistical reporting number 3925.20.0010 includes products not covered in the scope of these investigations. Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Effective September 1, 2019, fiberglass door panels and fiberglass sidelites originating in China were subject to an additional 15 percent ad valorem duty under section 301 of the Trade Act of 1974. Effective February 14, 2020, the section 301 duty for fiberglass door panels and fiberglass sidelites was reduced to 7.5 percent.¹¹

Effective February 4, 2025, fiberglass door panels and fiberglass sidelites originating in China became subject to an additional 10 percent ad valorem duty under the International Emergency Economic Powers Act (“IEEPA”), and on March 4, 2025, that additional duty increased to 20 percent ad valorem.¹²

Effective April 5, 2025, fiberglass door panels and fiberglass sidelites originating in China were subject to an additional 10 percent ad valorem reciprocal duty under IEEPA. That reciprocal duty rose to 84 percent ad valorem effective April 9, 2025, and rose again to 125 percent effective April 10, 2025.¹³

¹⁰ The scope states that imports of subject merchandise may also be classified under 4418.29.4000, 4418.29.8030, 4418.29.8060, or 7019.90.51.50.

¹¹ 84 FR 45821, August 30, 2019; 85 FR 3741, January 22, 2020. See also HTS heading 9903.88.15 and U.S. notes 20(r) and 20(s) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 8, Publication 5613, April 2025, pp. 99.3.106 to 99.3.119, 99.3.354.

¹² 90 FR 9121, February 7, 2025; 90 FR 11426, March 6, 2025; 90 FR 11463, March 7, 2025. See also HTS heading 9903.01.20 and U.S. note 2(s) and HTS heading 9903.01.24 and U.S. note 2(u) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 2, Publication 5590, February 2025, pp. 99.3.1, 99.3.278.

¹³ The reciprocal duty is in addition to the 20 percent ad valorem duty under IEEPA that went into effect on March 4, 2025, for China. 90 FR 15041, April 7, 2025; 90 FR 15509, April 14, 2025; 90 FR 15625, April 15, 2025. See also HTS headings 9903.01.25 and 9903.01.63 and U.S. note 2(v) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 8, Publication 5613, April 2025, pp. 99.3.1 to 99.3.10, 99.3.278.

The product

Description and applications

Fiberglass¹⁴ door panels and sidelites (or “sidelights”),¹⁵ whether solid or with glass inserts, are designed for permanent installation as exterior or entry doors.¹⁶ The fiberglass door panels are primarily used in residential and mixed-use buildings but can also be used in certain non-residential buildings such as barns, sheds, and storage buildings.¹⁷ Fiberglass door panels, including sidelites, have the following main components: (1) fiberglass skins; (2) frames; (3) an insulated core; and, (4) glass, if they have glass inserts. The fiberglass skins can have different surfaces and textures, and can be painted or unpainted, stained or unstained, and/or finished or unfinished. Fiberglass door panels reportedly require little maintenance, are long-lasting, lightweight, and water-resistant; and enhance energy efficiency.¹⁸ The fiberglass door panels may be impact-rated to withstand hurricane force wind loads (reinforced with steel sheet or plate) and/or fire-rated (containing flame retardant composites) for up to 90 minutes.¹⁹ Figure 1.1 depicts the components of a fiberglass door panel, with and without a glass insert.

¹⁴ Fiberglass is a composite product created by using thin glass fibers to strengthen plastic. Virtual Polymer Compounds, LLC, “Fiberglass - A Material Guide | Types, Benefits, Uses,” retrieved April 16, 2025, <https://www.vpcfiberglass.com/resources/why-fiberglass/#>.

¹⁵ In some cases, fiberglass door panels (and sidelites, as appropriate) are sold already assembled with hinges in a frame (i.e., pre-hung); the entire assembled product is then installed rather than just a door. Per the scope, “if a subject fiberglass door panel or sidelite is imported in a pre-hung door system or entry door system, only the fiberglass door panel and sidelite, including when assembled with glass lites or when the glass lites are shipped with the subject merchandise for further assembly, are covered by the scope.”

¹⁶ Petitions, pp. 6 to 7. The scope states that sidelites are “typically smaller in width than fiberglass door panels, and consist of at least one fiberglass skin, frames typically made of wood or composite stiles, bottom rails, and top rails, binding materials, including adhesives or fasteners, insulation foam, and may be assembled with glass lites (glass that is ultimately installed in the fiberglass sidelite).” Sidelites that are all glass (like transoms) and do not consist of at least one fiberglass skin are not covered by the scope of these investigations. 90 FR 15684 and 15692, April 15, 2025; Petitions, p. 25; conference transcript, pp. 57 (Dotson) and 58 (Dotson and Jaskiewicz).

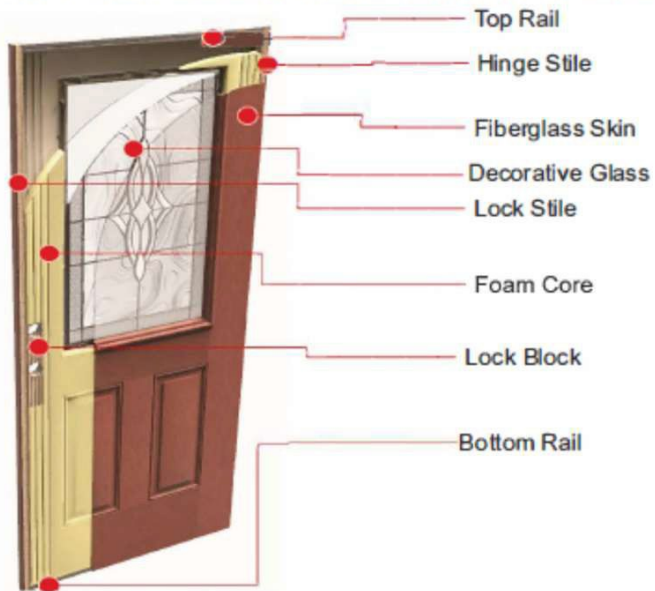
¹⁷ Petitions, pp. 6 to 7.

¹⁸ Josh Garskof, “All About Fiberglass Entry Doors,” *This Old House*, October 14, 2024, <https://www.thisoldhouse.com/doors/21017795/all-about-fiberglass-entry-doors>; Plastpro, “The Door of Beauty and Innovation,” 2017 Full Line Catalog, <https://www.paradiseseexteriors.com/wp-content/uploads/2019/10/Plastro-Brochure.pdf>.

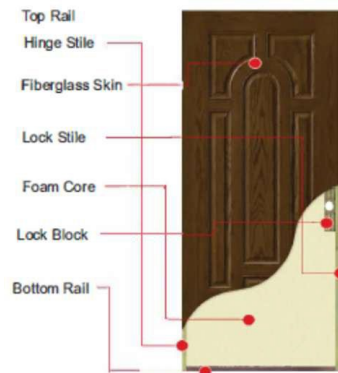
¹⁹ Petitions, pp. 6 to 7, 16 to 17.

Figure 1.1 Fiberglass door panels, with and without a glass insert

FIBERGLASS DOOR PANEL WITH GLASS



Fiberglass Door Panel



Source: Petitioner's conference presentation materials, April 9, 2025, p. 20.

Manufacturing processes

The first step in manufacturing fiberglass door panels is to use heat and pressure to convert sheet molded compound ("SMC") into fiberglass door skins with the desired forms (e.g., a six-panel door) and textures (such as a pattern that resembles hardwood grain).²⁰ SMC is created by heating a blend of plastic resins and other chemicals into a paste that is then spread over a plastic film. Glass fibers are added to the paste and another layer of paste is added on top of the glass fiber mixture. The resulting "sandwich" is compacted by heavy press dies and heat, adding the form and texture, and then allowed to set and harden.²¹ Some fiberglass door panel manufacturers are vertically integrated and produce their own SMC, while others purchase SMC and/or fiberglass door skins from outside vendors.²²

The fiberglass door skins are then attached to door frames (i.e., door styles, a top door rail, a bottom door rail, and a wooden lock block) with adhesives and glues, and glass can be inserted.²³ Inserting glass during the manufacturing process creates flush-glazed or direct-glaze fiberglass door panels and sidelites (i.e., they don't have raised moldings with the screw holes).²⁴ For styles that are rated as being impact-resistant or fire-resistant, steel sheets/plates or an additional composite foam would be added at this step.²⁵ The product's core is then filled with an expandable insulating foam (e.g., polyurethane foam) and sealed with a plug.²⁶ Final steps include preparing the cutouts for door accessories, final fabrication, and packaging.²⁷ Some fiberglass door panel manufacturers are vertically integrated and finish, assemble, and package their own final product which is then shipped to the customer, while others sell their door panels to a door fabricator or prehanger for final finishing and assembly.²⁸

²⁰ Petitions, p. 15; conference transcript, p. 22 (Dotson).

²¹ Petitions, p. 15; conference transcript, p. 22 (Dotson).

²² Conference transcript, p. 22 (Dotson).

²³ Conference transcript, pp. 22 and 121 (Dotson).

²⁴ Conference transcript, pp. 22 and 121 (Dotson); 83 (Tull); and 185 and 202 (Nonemaker and So). Respondent Trinity Glass stated that a small percentage of its imports enter the United States pre-glazed with the glass insert, but it glazes most of its products at its facility in Florida. Conference transcript, pp. 185 (Nonemaker and So) and 192 (So).

²⁵ As noted in the scope (90 FR 15684 and 15692, April 15, 2025), the products have to meet certain certifications to be rated as being impact-resistant or fire-resistant. Impact-rated doors may be certified to Testing Application Standards (TAS) 201/202/203-94/ and American Society for Testing and Materials (ASTM) E330-02/14/M-14, E1886-05/13a/, or E1996-09/14a; and fire-rated doors generally satisfy the National Fire Protection Association (NFPA) 252 Standard Methods of Fire Tests of Door Assemblies and UL10(b) and (c)-Standard for Safety-Fire Tests of Door Assemblies.

²⁶ Conference transcript, p. 22 (Dotson).

²⁷ Petitions, p. 15.

²⁸ Conference transcript, pp. 22 to 23 (Dotson).

Domestic like product issues

Information was collected from responding firms in these investigations to explore whether out-of-scope (1) medium density fiberboard door panels, (2) wood door panels, and (3) steel door panels should be included in the definition of the domestic like product. Petitioner proposes a single domestic like product coextensive with the scope of these investigations.²⁹ Respondent Trinity Glass does not challenge the petitioner's like product definition for the purposes of the preliminary phase investigations.³⁰

The Commission's decision regarding the appropriate domestic product(s) that are "like" the subject imported product is based on a number of factors including: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) common manufacturing facilities, production processes, and production employees; (5) customer and producer perceptions; and (6) price. Comparability ratings for each of these factors for fiberglass door panels versus out-of-scope (1) medium density fiberboard door panels, (2) wood door panels, and (3) steel door panels are presented in tables 1.4 to 1.6. Responding firms' narrative explanations of their rankings are presented in appendix D.

Table 1.4 Fiberglass door panels: Count of firm's responses regarding the domestic like product factors comparing fiberglass door panels and medium density fiberboard door panels

Count in number of firms reporting

Firm type	Factor	Fully	Mostly	Somewhat	Never
U.S. producers	Physical characteristics	0	0	0	4
U.S. producers	Interchangeability	0	0	0	4
U.S. producers	Channels	0	1	1	1
U.S. producers	Manufacturing	0	0	0	3
U.S. producers	Perceptions	0	0	0	4
U.S. producers	Price	0	0	0	4
U.S. importers	Physical characteristics	0	1	2	14
U.S. importers	Interchangeability	0	1	1	15
U.S. importers	Channels	6	3	0	9
U.S. importers	Manufacturing	0	0	1	11
U.S. importers	Perceptions	0	0	1	14
U.S. importers	Price	0	0	1	13

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

²⁹ Petitioner's postconference brief, p. 4.

³⁰ Conference transcript, p. 158 (Nicely).

Table 1.5 Fiberglass door panels: Count of firm's responses regarding the domestic like product factors comparing fiberglass door panels and wood door panels

Count in number of firms reporting

Firm type	Factor	Fully	Mostly	Somewhat	Never
U.S. producers	Physical characteristics	0	0	1	3
U.S. producers	Interchangeability	0	0	2	2
U.S. producers	Channels	0	1	2	1
U.S. producers	Manufacturing	0	0	0	4
U.S. producers	Perceptions	0	0	1	3
U.S. producers	Price	0	0	2	2
U.S. importers	Physical characteristics	0	3	6	10
U.S. importers	Interchangeability	1	4	6	8
U.S. importers	Channels	5	3	6	4
U.S. importers	Manufacturing	0	1	2	11
U.S. importers	Perceptions	0	1	9	7
U.S. importers	Price	0	0	8	8

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

Table 1.6 Fiberglass door panels: Count of firm's responses regarding the domestic like product factors comparing fiberglass door panels and steel door panels

Count in number of firms reporting

Firm type	Factor	Fully	Mostly	Somewhat	Never
U.S. producers	Physical characteristics	0	0	1	3
U.S. producers	Interchangeability	0	0	2	2
U.S. producers	Channels	1	1	1	1
U.S. producers	Manufacturing	0	0	0	4
U.S. producers	Perceptions	0	0	1	3
U.S. producers	Price	0	0	2	2
U.S. importers	Physical characteristics	0	8	10	3
U.S. importers	Interchangeability	3	6	9	3
U.S. importers	Channels	7	5	5	1
U.S. importers	Manufacturing	0	3	4	7
U.S. importers	Perceptions	1	5	8	5
U.S. importers	Price	0	5	9	5

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

Part 2: Conditions of competition in the U.S. market

U.S. market characteristics

Fiberglass door panels are primarily used as exterior or entry doors in residential and mixed-use buildings but may be used in non-residential applications such as barns, sheds, and storage buildings. These fiberglass door panels comprise, at a minimum, three main components: fiberglass skins; frames; and an insulated core. Specifically, the two fiberglass skins are usually attached to a frame, which is typically produced from laminated veneer lumber or composite materials consisting of stiles and rails, and the core of the door is filled with insulation foam. The fiberglass skin can be pressed into different models, styles, and configurations, including smooth, embossed, and textured door panels. Covered fiberglass door panels can be painted or unpainted, stained or unstained, finished or unfinished.

Following a period of high demand in 2022, U.S. demand conditions began to soften in 2023, as interest rates increased and new builds slowed. Residential construction spending also fell in late 2022 and into 2023 before increasing in 2024 (see U.S. demand below). Apparent U.S. consumption of fiberglass door panels fluctuated during January 2022 to December 2024. Overall, apparent U.S. consumption in 2024 was lower than in 2022.

All four U.S. producers and seven importers (including *** firms that also produce in the United States)¹ indicated that the fiberglass door panel market was subject to distinctive conditions of competition. Specifically, producers stated that their business decisions are based on seasonality and generally follow the housing markets. The market is typically slower in the first quarter due to lower demand for home remodeling and construction during the colder months. Three U.S. producers described such conditions as the market being price sensitive and vulnerable to subject imports. U.S. producer *** described competition as based on the product's ability to look like a wooden door. Importer *** indicated that in 2022, there was a lack of available resin for domestic fiberglass manufacturers, causing idled fiberglass door panel production and in turn, distributors looking for alternative sources of supply. Importers *** described operating in market segments such as ***. Importer *** indicated that demand for fiberglass door panels follows new housing market conditions, and importer *** indicated that competition in the U.S. market had increased. Sixteen importers indicated that the fiberglass door panel market was not subject to distinctive conditions of competition.

¹ *** submitted both U.S. producers' and importers' questionnaires.

Impact of section 301 tariffs and section 232 tariffs

U.S. producers, importers, and purchasers were asked to report the impact of section 301 tariffs and section 232 tariffs on overall demand, supply, prices, or raw material costs.

Three producers responded that 301 tariffs did not have any impact on the market while one producer responded it did not know. The three producers stated that the section 301 tariffs have been in place since 2019 but have not prevented Chinese imports from pricing their fiberglass door panels below the cost of their own production. Petitioner stated that subject producers have simply absorbed section 301 duties as the cost of doing business.² Eight importers reported that the section 301 tariffs did have an impact by generally raising costs. Six importers reported that the section 301 tariffs did not have an impact, and 10 importers reported they did not know.

Two producers responded that section 232 tariffs on steel and aluminum did not have any impact on the market, and two producers responded they did not know. Producer *** reported that since fiberglass door panels have very little if any steel inputs there has not been an impact on the panels' cost price, supply, or demand because of these tariffs. Six importers reported that the section 232 tariffs did have an impact by increasing the cost of steel doors, as a result, the price gap between steel and fiberglass doors has narrowed. Importer *** reported that fiberglass doors have traditionally been perceived as a premium product compared to steel doors but are now competitive with steel doors. Due to the increased cost of steel, fiberglass doors are now able to capture some market share that had traditionally been exclusively part of the steel door market. Seven importers reported that the section 232 tariffs did not have an impact, and 11 importers reported they did not know.

All four producers reported that they did not know what would be the impact of the proposed tariffs stemming from recent executive orders (e.g., new Canada or Mexico tariffs, new China tariffs as imposed under the International Emergency Economic Powers Act (“IEEPA”), announcement of reciprocal tariffs). Petitioner asserts that the notion that these IEEPA tariffs are permanent is unfounded in the reality of today’s political climate, contending that subject producers have not been and will not be deterred from exporting their subject merchandise to the United States to the detriment of the domestic industry.³ Thirteen importers reported that the proposed tariffs stemming from recent executive orders will have an impact by generally raising costs and prices. Two importers reported that these tariffs will not have an impact, and nine importers reported they did not know.

² Petitioner’s postconference brief p. 66

³ Petitioner’s postconference brief p. 67

Channels of distribution

U.S. producers sold mainly to distributors as shown in table 2.1, while importers mainly sold to retailers but still had a large portion of their sales to distributors.

Table 2.1 Fiberglass door panels: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent

Source	Channel	2022	2023	2024
United States	Distributors	83.8	83.1	83.4
United States	Retailers	7.5	7.1	7.9
United States	Builders/contractors	0.6	0.7	0.7
United States	Other end users	8.2	9.1	7.9
China	Distributors	39.0	30.7	36.2
China	Retailers	48.2	51.7	46.3
China	Builders/contractors	0.4	3.5	3.5
China	Other end users	12.3	14.1	13.9
Nonsubject	Distributors	71.5	82.6	82.9
Nonsubject	Retailers	0.0	0.0	0.0
Nonsubject	Builders/contractors	0.3	0.3	0.3
Nonsubject	Other end users	28.3	17.0	16.8
All imports	Distributors	54.9	50.9	55.1
All imports	Retailers	24.6	31.6	27.6
All imports	Builders/contractors	0.3	2.3	2.2
All imports	Other end users	20.1	15.3	15.1

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

Geographic distribution

U.S. producers reported selling fiberglass door panels to all regions in the contiguous United States and two producers sell to other U.S. markets (table 2.2). Importers reported selling mostly to the Midwest, Northeast, and Southeast, but at least some importers sold product in all regions. For U.S. producers, 2.8 percent of sales were within 100 miles of their production facility, 52.0 percent were between 101 and 1,000 miles, and 45.2 percent were over 1,000 miles. Importers sold 10.2 percent within 100 miles of their U.S. point of shipment, 50.1 percent between 101 and 1,000 miles, and 39.7 percent over 1,000 miles.

Table 2.2 Fiberglass door panels: Count of U.S. producers' and U.S. importers' geographic markets

Region	U.S. producers	China
Northeast	4	8
Midwest	4	12
Southeast	4	9
Central Southwest	4	7
Mountains	4	5
Pacific Coast	4	7
Other	2	2
All regions (except Other)	4	4
Reporting firms	4	18

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

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

Supply and demand considerations

U.S. supply

Table 2.3 provides a summary of the supply factors regarding fiberglass door panels from U.S. producers and from the subject country. Chinese producers reported their capacity grew by 70.9 percent during the period of investigation although Chinese producers' capacity utilization stayed steady. Domestic capacity grew by *** percent, and capacity utilization decreased *** percentage points.

Table 2.3 Fiberglass door panels: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Quantity in units; ratios and shares in percent; count in number of firms reporting

Factor	Measure	United States	China
Capacity 2022	Quantity	***	***
Capacity 2024	Quantity	***	***
Capacity utilization 2022	Ratio	***	***
Capacity utilization 2024	Ratio	***	***
Inventories to total shipments 2022	Ratio	***	***
Inventories to total shipments 2024	Ratio	***	***
Home market shipments 2024	Share	***	***
Non-US export market shipments 2024	Share	***	***
Ability to shift production	Count	***	***

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

Note: Responding U.S. producers accounted for the vast majority of U.S. production of fiberglass door panels in 2024. Responding Chinese producers/exporters accounted for the majority of U.S. imports of fiberglass door panels from China in 2024 as reported by responding U.S. importers. 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 Parts 3 and 7.

Domestic production

Based on available information, U.S. producers of fiberglass door panels have the ability to respond to changes in demand with large changes in the quantity of shipments of U.S.-produced fiberglass door panels to the U.S. market. The main contributing factor to this degree of responsiveness of supply is the substantial availability of unused capacity. Factors mitigating responsiveness of supply include limited inventories, limited ability to shift shipments from alternate markets and limited ability to shift production to or from alternate products. Domestic producers reported that they cannot produce other products on the same equipment as fiberglass door panels.

Subject imports from China

Based on available information, producers of fiberglass door panels from China have the ability to respond to changes in demand with moderate to large changes in the quantity of shipments of fiberglass door panels to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the ability to shift shipments from alternate markets or inventories, and the ability to increase capacity massively year by year, thus the reported high utilization by Chinese firms has not shown to be a binding constraint. Factors mitigating responsiveness of supply include limited availability of inventories, and limited ability to shift production to or from alternate products. Foreign producers reported that they cannot produce other products on the same equipment as fiberglass door panels.

Imports from nonsubject sources

Nonsubject imports accounted for 39.3 percent of total U.S. imports by quantity in 2024. The largest sources of nonsubject imports during January 2022 to December 2024 were Canada and Taiwan.

Supply constraints

Two of four U.S. producers and 19 of 24 importers reported that they had not experienced supply constraints since January 1, 2022. However, two U.S. producers and five importers indicated that they had. Of those that reported they had experienced supply constraints, both U.S. producers reported that the constraints only occurred during 2022. Of the importers, five reported that the constraints occurred during 2022, four reported they occurred during 2023, and two reported they occurred during 2024. U.S. producers *** reported that they put purchasers on allocation in 2022 due to long lead times

created by increased raw material prices and increased demand for the product during the COVID-19 pandemic. Producer *** reported that ***. Importer *** described U.S. producer *** as experiencing supply constraints due to shortages of U.S. sourced sheet molded compound (SMC) which lasted into 2023. Importers *** also indicated that they had experienced shortages of SMC. These shortages were due to lingering effects of the COVID-19 pandemic on resin and glass supply. Importers also reported an increase in ocean freight costs and lead times. Importer *** reported that in 2024, its ***.

U.S. demand

Based on available information, the overall demand for fiberglass door panels is likely to experience small changes in response to changes in price. The main contributing factors are the lack of substitute products for residential homes and the low-cost share and importance of doors in residential construction.

U.S. producers stated that demand in the fiberglass door panel market is seasonal and generally follows the housing markets. Total construction spending on residential buildings in the United States (table 2.4 and figure 2.1) saw a period of high spending in 2022 followed by softening in the later part of 2022 and into 2023, as residential construction spending decreased before increasing in 2024.

Petitioner stated that national residential home builders increase their profits by carefully managing the costs of building materials, including fiberglass door panels. These builders exert pricing pressure throughout the channel by contracting with dealers that can offer lower prices.⁴

⁴ Email from Petitioner, April 16, 2025, EDIS document ID: 848998.

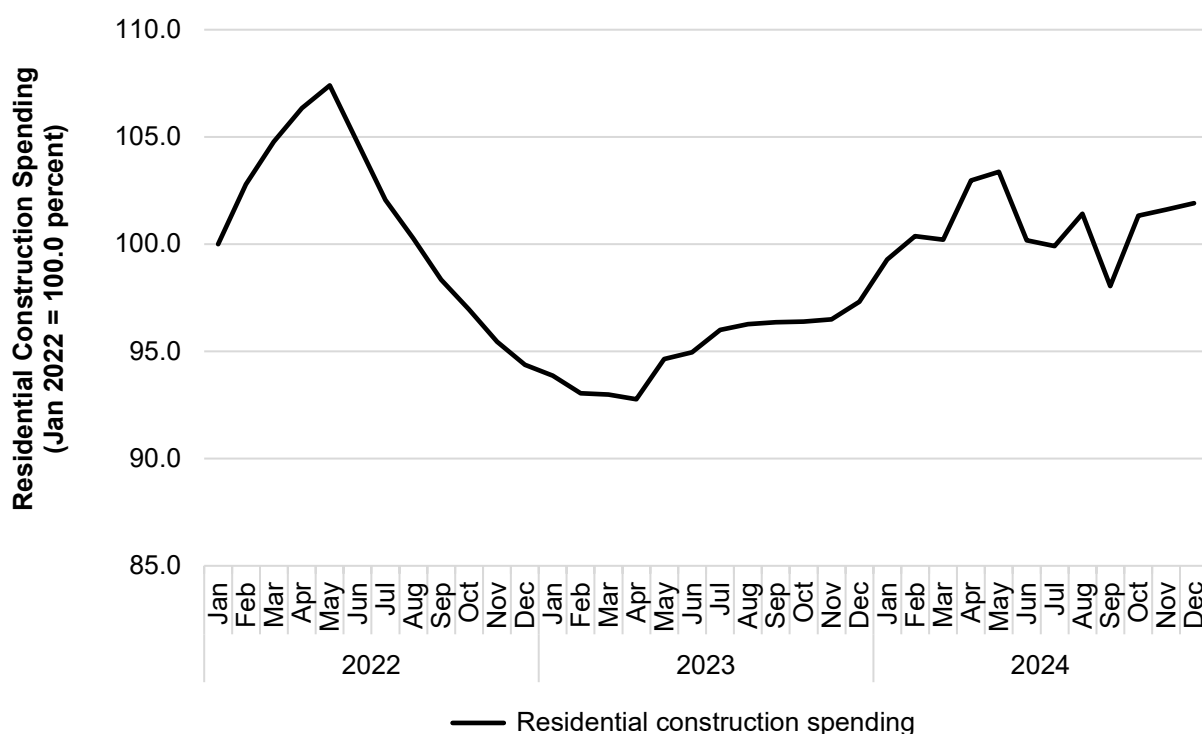
Table 2.4 Fiberglass door panels: Demand driver: Seasonally Adjusted Total Construction Spending: Residential in the United States, by month

Index in percent, Jan 2022 = 100.0 percent.

Month	2022	2023	2024
January	100.00	93.87	99.28
February	102.79	93.05	100.38
March	104.78	92.99	100.21
April	106.35	92.77	102.97
May	107.40	94.64	103.38
June	104.73	94.96	100.17
July	102.06	96.00	99.90
August	100.27	96.26	101.42
September	98.34	96.36	98.04
October	96.96	96.39	101.33
November	95.44	96.49	101.61
December	94.37	97.31	101.91

Source: U.S. Census Bureau, Total Construction Spending: Residential in the United States ***, retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/TLRESCONS>, April 2, 2025.

Figure 2.1 Fiberglass door panels: Demand driver: Seasonally Adjusted Total Construction Spending: Residential in the United States, by month



Source: U.S. Census Bureau, Total Construction Spending: Residential in the United States ***, retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/TLRESCONS>, April 2, 2025.

End uses and cost share

U.S. demand for fiberglass door panels depends on the demand for U.S.-produced exterior door systems, usually for residential homes. A fiberglass door panels accounts for a moderate share of the cost of the pre-hung door system in which it is used. Reported cost shares of fiberglass door panels in a pre-hung door system ranged from 14 to 67 percent. Three U.S. producers reported that the end use for fiberglass door panels is the installation of the panel in a residential home and reported the cost shares of fiberglass door panels in a residential home as under 1 percent. The U.S. producers report that the other costs in a home include the land, labor, and building materials, such as framing, concrete for the foundation, roofing, and internal fixtures.

Business cycles

All four U.S. producers, and 11 of 23 importers indicated that the market was subject to business cycles. Many firms stated that fiberglass door panel business cycles generally follow the housing markets, and are thus more active in the spring/summer and in response to interest rates. The market is typically slower in the first quarter due to lower demand for home remodeling and construction during colder months. Twelve importers indicated that the fiberglass door panel market is not subject to business cycles.

Demand trends

Most importers reported an increase in U.S. demand for fiberglass door panels since January 1, 2022 (table 2.5), while two U.S. producers reported that demand had fluctuated downward. U.S. producer *** reported that domestic demand declined due to the low pricing of fiberglass door panels from China, selling below *** costs. U.S. producer *** reported that demand for fiberglass door panels generally follows demand for residential housing, which has declined since 2022 due to higher interest rates and inflation. Importers describing demand increases generally attributed the increases to substitution away from steel doors, while importers describing demand decreases attributed the decreases to higher interest rates and other slowdowns in the U.S. housing market.

Table 2.5 Fiberglass door panels: Count of firms' responses regarding overall domestic and foreign demand, by firm type

Count in number of firms reporting

Market	Firm type	Steadily Increase	Fluctuate Up	No change	Fluctuate Down	Steadily Decrease
Domestic demand	U.S. producers	1	0	1	2	0
Domestic demand	Importers	11	3	5	4	0
Foreign demand	U.S. producers	0	0	0	1	2
Foreign demand	Importers	3	0	6	2	1

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

Substitute products

Two U.S. producers and 11 importers indicated that there were substitutes for fiberglass door panels, generally citing steel, wood, and sometimes aluminum panels. ***, which indicated that steel panels can be a substitute, added that steel panels are not typical substitutes with fiberglass door panels due to fiberglass having better aesthetics, rust and dent resistance, energy efficiency, and lower overall maintenance. Importers *** also described steel doors as “inferior” substitutes for fiberglass door panels. *** reported that the wood slabs are not directly substitutable with fiberglass panels due to fiberglass having better weather and water resistance, longevity, and lower overall maintenance. However, importer *** described wood doors as considered superior to fiberglass door panels. Two U.S. producers and nine importers indicated that there were no substitutes for fiberglass door panels.

Only one firm, importer ***, indicated that changes in the prices of substitutes had affected the price of fiberglass door panels. It described the increase in steel prices due to tariffs as having caused substitution toward fiberglass door panels.

Substitutability issues

This section assesses the degree to which U.S.-produced fiberglass door panels and imports of fiberglass door panels from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of fiberglass door panels from domestic and imported sources based on those factors. Based on available data, staff believes that there is a high degree of substitutability between domestically produced fiberglass door panels and fiberglass door panels imported from subject sources.⁵ Factors

⁵ The degree of substitution between domestic and imported fiberglass door panels depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced fiberglass door panels to the fiberglass door panels imported from subject countries (or vice versa) when prices change. The degree of substitution
(continued...)

contributing to this level of substitutability include similar quality, availability, and lead times for fiberglass door panels from inventory, interchangeability between domestic and subject sources, and limited significant factors other than price. Factors reducing substitutability include different lead times from domestic/subject sources when produced-to-order and factors other than price that firms consider, such as design of the panels.

Factors affecting purchasing decisions

Most important purchase factors

Purchasers responding to lost sales lost revenue allegations⁶ were asked to identify the main purchasing factors their firm considered in their purchasing decisions for fiberglass door panels.

The most often cited top three factors firms consider in their purchasing decisions for fiberglass door panels were quality (10 firms), price (five firms), and availability of supply (four firms), as shown in table 2.6. Quality was the most frequently cited first-most important factor (cited by five firms), followed by availability/supply (three firms); quality again was the most frequently reported second-most important factor (four firms); and price along with customer support services was the most frequently reported third-most important factor (3 firms each).

may include such factors as 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.).

⁶ This information is compiled from responses by purchasers identified by Petitioner to the lost sales lost revenue allegations. See Part 5 for additional information.

Table 2.6 Fiberglass door panels: Count of ranking of factors used in purchasing decisions as reported by U.S. purchasers, by factor

Count in number of firms reporting

Factor	First	Second	Third	Total
Price / Cost / Value	1	2	3	5
Quality	5	4	1	10
Availability / Supply	3	2	0	4
Support / Communication / Service	0	1	3	3
All other factors	1	1	3	NA

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

Note: Other factors include panel sizes offered, timeliness of deliveries, energy efficiency of the panels, and “Brand/Pull Through.”

Lead times

Fiberglass door panels are primarily sold from inventory. U.S. producers reported that 68.9 percent of their commercial shipments were sold from inventory, with lead times averaging 20 days. The remaining 31.1 percent of their commercial shipments were produced-to-order, with lead times averaging 33.8 days. Importers reported that 60.1 percent of their commercial shipments were from U.S. inventories, with lead times averaging 23.3 days from U.S. inventories. The remaining 39.9 percent of their commercial shipments were produced-to-order, with lead times averaging 97.8 days.

Comparison of U.S.-produced and imported fiberglass door panels

In order to determine whether U.S.-produced fiberglass door panels can generally be used in the same applications as imports from China, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables 2.7, U.S. producers reported that fiberglass door panels from all sources were always interchangeable. Most responding importers described fiberglass door panels from all sources as always or frequently interchangeable.

Petitioner stated that domestic and subject products are highly fungible and interchangeable and substitutable.⁷ Producer Plastpro stated that it never encountered an instance where the Chinese manufacturers did not have all the necessary certifications to sell fiberglass doors in certain markets, such as in Florida.⁸ Importer *** reported that Chinese fiberglass door panels are designed to meet U.S. specifications and standards, and for

⁷ Conference transcript, p. 50 (Kaplan)

⁸ Conference transcript, p. 98 (Tull)

specific customers and applications can be interchangeable with U.S. produced panels.

Importer *** described U.S. product availability as limited.

Table 2.7 Fiberglass door panels: Count of U.S. producers and U.S. importers reporting interchangeability between product produced in the United States and in other countries reported, by country pair and firm type

Count in number of firms reporting

Country pair	Firm Type	Always	Frequently	Sometimes	Never
United States vs. China	U.S. producers	3	0	0	0
United States vs. Other	U.S. producers	3	0	0	0
China vs. Other	U.S. producers	3	0	0	0
United States vs. China	Importers	7	6	7	0
United States vs. Other	Importers	6	4	2	0
China vs. Other	Importers	4	3	2	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 fiberglass door panels from the United States, subject, or nonsubject countries. As seen in tables 2.8, U.S. producers described such differences as never significant; while importers' responses were varied, a plurality of importers reported differences other than price as always significant.

Producer Therma-Tru stated that historically, there were many factors other than price, including warranty and product performance. However, it stated that over the last two years, the value of those factors drastically decreased because the gross gap in pricing is too much to account for those other factors.⁹ Petitioner stated that many of the non-price factors have equalized, and that price is now the predominant factor.¹⁰ Producer *** reported that prices for fiberglass door panels from China are so low that non-price factors are never significant.

Importer Trinity Glass stated that while price is a factor, consumer preference plays a role, where decisions are usually based on what configuration or design the consumer is looking for, whether painted or stained, the addition of various features, the attached components or the assembly of the door. Trinity Glass stated that "everything is not a particularly like item...so everything's not apples to apples when it comes to look or design in particular door panels".¹¹ Trinity Glass provided their patented molded open flush-glazed panel design as an example of a non-price factor consumer might consider. The molded open flush-glazed panels feature glass

⁹ Conference transcript, pp. 82 to 83 (Fein)

¹⁰ Conference transcript, p. 72 (Kaplan)

¹¹ Conference transcript, p. 178 (Nonemaker)

incorporated directly into the door's structure without any visible framing while providing high structural integrity. Importer *** reported that availability and product range are limited for U.S. production compared to that of other countries. Importer *** described U.S. producers as leading the way in providing new products that meet all codes and energy efficiency demands. It continued that Chinese producers do not have a domestic market for fiberglass door panels, and primarily manufacture for the U.S. market.

Table 2.8 Fiberglass door panels: Count of U.S. producers and U.S. importers reporting the significance of differences other than price between product produced in the United States and in other countries reported, by country pair

Count in number of firms reporting

Country pair	Firm Type	Always	Frequently	Sometimes	Never
United States vs. China	U.S. producers	0	0	0	3
United States vs. Other	U.S. producers	0	0	0	3
China vs. Other	U.S. producers	0	0	0	3
United States vs. China	Importers	8	3	4	4
United States vs. Other	Importers	6	2	2	1
China vs. Other	Importers	3	1	1	3

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

Part 3: U.S. producers' production, shipments, and employment

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the subsidies and dumping margins was presented in Part 1 of this report and information on the volume and pricing of imports of the subject merchandise is presented in Part 4 and Part 5. Information on the other factors specified is presented in this section and/or Part 6 and (except as noted) is based on the questionnaire responses of four firms that accounted for the vast majority of U.S. production of fiberglass door panels during 2024.^{1 2}

U.S. producers

The Commission issued a U.S. producer questionnaire to seven firms based on information contained in the petitions. Four firms provided usable data on their operations.^{3 4} Table 3.1 lists U.S. producers of fiberglass door panels, their production locations, positions on the petitions, and shares of total production.

Table 3.1 Fiberglass door panels: U.S. producers, their positions on the petitions, production locations, and shares of reported production, 2024

Firm	Position on petitions	Production location(s)	Share of production
Owens Corning	Petitioner	Laurel, MS Dickson, TN Pittsburg, KS	***
Plastpro	Petitioner	Ashtabula, OH	***
ProVia	***	Sugarcreek, OH	***
Therma-Tru	Petitioner	Butler, IN	***
All firms	Various	Various	100.0

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

¹ Petitioner estimates that total U.S. production of fiberglass door panels was *** units in 2024. Based on this estimate, responding U.S. producers' production (*** units) accounted for *** percent of total U.S. production of fiberglass door panels in 2024. Petitions, p. 4.

² Production data for *** are included throughout Part 3. However, Commission staff were unable to include its financial data in Part 6 due to reporting issues discussed in that section.

³ U.S. producers *** did not submit questionnaire responses during the preliminary phase of these investigations. Petitioner estimates that these firms collectively account for *** percent of total U.S. production of fiberglass door panels in 2024. Petitions, p. 3.

⁴ One firm (***) certified that it had not produced fiberglass door panels in the United States at any time since January 1, 2022.

Table 3.2 presents information on U.S. producers' ownership, related and/or affiliated firms. No responding U.S. producer is related to foreign producers/exporters of the subject merchandise or importers of the subject merchandise. As discussed in greater detail below, *** reported imports of the subject merchandise during the period for which data were collected. No responding U.S. producer reported purchasing the subject merchandise from U.S. importers.

Table 3.2 Fiberglass door panels: 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.

Table 3.3 presents events in the U.S. industry since January 1, 2022.

Table 3.3 Fiberglass door panels: Important industry events since 2022

Item	Firm	Event
Partnership	Therma-Tru	Therma-Tru Corp. (U.S. manufacturer of fiberglass entry doors) partnered with Larson Inc. (U.S. manufacturer of storm doors) in January 2022 to provide an integrated storm and entry door system.
Acquisition	Masonite	On December 18, 2023, Masonite International Corp. ("Masonite") announced intent to acquire PGT Innovations, a manufacturer and supplier of high-end windows, doors, and garage doors.
Acquisition	Owens Corning	Owens Corning completed its acquisition of Masonite on May 15, 2024.
Expansion	Plastpro	Plastpro acquired the Mohawk Fine Paper facility in Ashtabula County, OH, in November 2024, investing over \$52 million to add 145 jobs, increase production capacity (in part by adding production capacity for sheet molding compound (SMC) that would make the company more vertically integrated), and expand the manufacturing site to 1.2 million square feet by November 2026. The project was awarded an \$810,000 tax credit. Plastpro has since stated that it is holding off on buying the equipment needed for the facility.

Source: The Business Research Company, "Fiberglass Doors Global Market Report 2025," January 2025, <https://www.thebusinessresearchcompany.com/report/fiberglass-doors-global-market-report>; Owens Corning, "Owens Corning Completes Acquisition of Masonite, Strengthening Leadership in Building and Construction Materials," press release, May 15, 2024, <https://investor.owenscorning.com/investors/stock-performance-and-earnings/press-releases/press-release-details/2024/Owens-Corning-Completes-Acquisition-of-Masonite-Strengthening-Leadership-in-Building-and-Construction-Materials/default.aspx>; Connor Ball, "Plastpro 2000 Inc. Acquires Former Mohawk Building," October 30, 2024, https://www.starbeacon.com/news/plastpro-2000-inc-acquires-former-mohawk-building/article_05ca8568-9566-11ef-bc52-6f7301c40e7a.html; Connor Ball, "Plastpro 2000 Inc. CEO Shirley Wang Speaks on Acquisition of Mohawk Fine Papers Inc. Facility, November 15, 2024, https://www.starbeacon.com/news/plastpro-2000-inc-ceo-shirley-wang-speaks-on-acquisition-of-mohawk-fine-papers-inc-facility/article_e2029698-a2c1-11ef-8fe2-af19aefb66f0.html; Mary Vanac, "Northeast Ohio Manufacturers Win Ohio Tax Credits to Expand," *Cleveland Business Journal*, October 28, 2024; Masonite, "Masonite Announces Transformative Acquisition of PGT Innovations, Creating a Leading Door and Window Solutions Company with Over \$4 Billion In Combined Revenue," press release, <https://www.businesswire.com/news/home/20231218156228/en/Masonite-Announces-Transformative-Acquisition-of-PGT-Innovations-Creating-a-Leading-Door-and-Window-Solutions-Company-with-Over-%244-Billion-In-Combined-Revenue>; JobsOhio, "Plastpro 2000 Announces Significant Expansion in Ashtabula, Creating 145 New Jobs," October 28, 2024, <https://www.jobsohio.com/news-press/plastpro-2000-announces-significant-expansion-in-ashtabula-creating-145-new-jobs>; Catherine Kavanaugh, "Door Maker Plastpro Spending \$52.7M in Ohio to Add Capacity, Products," October 29, 2024, <https://www.plasticsnews.com/news/door-maker-plastpro-invests-52m-ohio-add-capacity-products>; conference transcript, p. 36 (An).

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of fiberglass door panels since 2022. All four responding U.S. producers indicated in their questionnaires that they had experienced such changes. Table 3.4 presents the changes identified by these producers.

Table 3.4 Fiberglass door panels: U.S. producers' reported changes in operations, since January 1, 2022

Item	Firm name and narrative response on changes in operations
Production curtailments	***
Production curtailments	***
Expansions	***
Expansions	***
Acquisitions	***
Acquisitions	***
Other	***

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

U.S. production, capacity, and capacity utilization

Table 3.5 presents U.S. producers' installed and practical capacity and production on the same equipment. From 2022 to 2024, U.S. producers' installed overall capacity increased by *** percent and practical overall capacity increased by *** percent. Installed overall capacity utilization fell by *** percentage points from 2022 to 2023, then increased by *** percentage points from 2023 to 2024, decreasing overall by *** percentage points between 2022 and 2024. U.S. producers' practical overall capacity utilization followed a similar trend, decreasing by *** percentage points from 2022 to 2023, then increasing by *** percentage points from 2023 to 2024, for an overall decrease of *** percentage points during 2022 to 2024.

Table 3.5 Fiberglass door panels: 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	2022	2023	2024
Installed overall	Capacity	***	***	***
Installed overall	Production	***	***	***
Installed overall	Utilization	***	***	***
Practical overall	Capacity	***	***	***
Practical overall	Production	***	***	***
Practical overall	Utilization	***	***	***
Practical Fiberglass door panels	Capacity	***	***	***
Practical Fiberglass door panels	Production	***	***	***
Practical Fiberglass door panels	Utilization	***	***	***

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

Table 3.6 presents U.S. producers' reported narratives regarding practical capacity constraints.

Table 3.6 Fiberglass door panels: U.S. producers' reported capacity constraints since January 1, 2022

Item	Firm name and narrative response on constraints to practical overall capacity
Existing labor force	***
Existing labor force	***
Supply of material inputs	***
Supply of material inputs	***
Supply of material inputs	***
Storage capacity	***
Other constraints	***
Other constraints	***

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

Table 3.7 and figure 3.1 present U.S. producers' production, capacity, and capacity utilization. U.S. producers' practical capacity increased by *** percent between 2022 and 2024.⁵ In contrast, production decreased by *** percent from 2022 to 2023, then increased by *** percent from 2023 to 2024, for an overall *** percent decrease during 2022 to 2024.⁶ U.S. producers' capacity utilization decreased by *** percentage points from 2022 to 2023, then increased by *** percentage points from 2023 to 2024, decreasing overall by *** percentage points between 2022 and 2024.

Table 3.7 Fiberglass door panels: U.S. producers' output, by firm and period

Practical capacity

Capacity in units

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
ProVia	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

Table continued.

Table 3.7 (Continued) Fiberglass door panels: U.S. producers' output, by firm and period

Production

Production in units

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
ProVia	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

Table continued.

⁵ The overall increase in U.S. producers' practical capacity between 2022 and 2024 is due to increases reported by ***, which offset the decrease reported by ***. *** invested in new equipment, which increased its practical capacity by *** percent from 2022 to 2023. *** upgraded its production equipment, which increased its practical capacity by *** percent from 2022 to 2023. *** reduced operations (from 7 days per week to 5 days per week) and headcount, resulting in a *** percent decrease in its practical capacity from 2022 to 2023. Practical capacity was constant for *** U.S. producers from 2023 to 2024.

⁶ *** U.S. producers reported overall decreases in production from 2022 to 2024.

Table 3.7 (Continued) Fiberglass door panels: U.S. producers' output, by firm and period

Capacity utilization

Capacity utilization in percent

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
ProVia	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

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

Table continued.

Table 3.7 (Continued) Fiberglass door panels: U.S. producers' output, by firm and period

Share of production

Share in percent

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
ProVia	***	***	***
Therma-Tru	***	***	***
All firms	100.0	100.0	100.0

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

Figure 3.1 Fiberglass door panels: U.S. producers' output, by period

* * * * *

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

Alternative products

No responding U.S. producer reported production of any other products on the same equipment used to produce fiberglass door panels.

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

Table 3.8 presents U.S. producers' U.S. shipments, export shipments, and total shipments. U.S. producers' U.S. shipments accounted for *** total shipments between 2022 and 2024. *** U.S. producers (**) reported export shipments, which accounted for a small share (*** percent) of total shipments during the period for which data were collected. U.S. producers' U.S. shipments decreased by *** percent from 2022 to 2023, then increased by *** percent from 2023 to 2024, for an overall *** percent decrease between 2022 and 2024.⁷ Export shipments fell by *** percent during 2022 to 2024. U.S. shipment unit values were higher than export shipment unit values in each year between 2022 and 2024.

Table 3.8 Fiberglass door panels: U.S. producers' shipments, by destination and period

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

Item	Measure	2022	2023	2024
U.S. shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
U.S. shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***
U.S. shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
U.S. shipments	Share of quantity	***	***	***
Export shipments	Share of quantity	***	***	***
Total shipments	Share of quantity	100.0	100.0	100.0
U.S. shipments	Share of value	***	***	***
Export shipments	Share of value	***	***	***
Total shipments	Share of value	100.0	100.0	100.0

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

⁷ *** U.S. producers reported decreases in U.S. shipments from 2022 to 2023. Comparatively, *** U.S. producers reported increases from 2023 to 2024, while *** reported a decrease. ***'s U.S. shipments fell by *** percent between 2022 and 2024.

Table 3.9 presents U.S. producers' U.S. shipments by type. Commercial shipments decreased by *** percent from 2022 to 2023, then increased by *** percent from 2023 to 2024, decreasing overall by *** percent between 2022 and 2024. Similarly, internal consumption decreased by *** percent from 2022 to 2023, then increased by *** percent from 2023 to 2024, for an overall *** percent decrease between 2022 and 2024. Commercial shipment unit values and internal consumption unit values increased irregularly by *** percent and *** percent, respectively, from 2022 to 2024.

Table 3.9 Fiberglass door panels: U.S. producers' U.S. shipments, by type and period

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

Item	Measure	2022	2023	2024
Commercial U.S. shipments	Quantity	***	***	***
Internal consumption	Quantity	***	***	***
U.S. shipments	Quantity	***	***	***
Commercial U.S. shipments	Value	***	***	***
Internal consumption	Value	***	***	***
U.S. shipments	Value	***	***	***
Commercial U.S. shipments	Unit value	***	***	***
Internal consumption	Unit value	***	***	***
U.S. shipments	Unit value	***	***	***
Commercial U.S. shipments	Share of quantity	***	***	***
Internal consumption	Share of quantity	***	***	***
U.S. shipments	Share of quantity	100.0	100.0	100.0
Commercial U.S. shipments	Share of value	***	***	***
Internal consumption	Share of value	***	***	***
U.S. shipments	Share of value	100.0	100.0	100.0

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

Table 3.10 presents U.S. producers' U.S. shipments by product type. During 2022 to 2024, panels without sidelites accounted for between *** and *** percent of U.S. producers' U.S. shipments by quantity, while further processed panels accounted for between *** and *** percent, and sidelites sold separately accounted for between *** and *** percent.⁸ U.S. producers' U.S. shipments of each of these product types decreased by quantity and by value from 2022 to 2024.

⁸ *** U.S. producer reported U.S. shipments of panels with sidelites.

Table 3.10 Fiberglass door panels: U.S. producers' U.S. shipments, by product type and period

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

Product type	Measure	2022	2023	2024
Further processed panels	Quantity	***	***	***
Panels with sidelites	Quantity	***	***	***
Panels without sidelites	Quantity	***	***	***
Sidelites sold separately	Quantity	***	***	***
All product types	Quantity	***	***	***
Further processed panels	Value	***	***	***
Panels with sidelites	Value	***	***	***
Panels without sidelites	Value	***	***	***
Sidelites sold separately	Value	***	***	***
All product types	Value	***	***	***
Further processed panels	Unit value	***	***	***
Panels with sidelites	Unit value	***	***	***
Panels without sidelites	Unit value	***	***	***
Sidelites sold separately	Unit value	***	***	***
All product types	Unit value	***	***	***
Further processed panels	Share of quantity	***	***	***
Panels with sidelites	Share of quantity	***	***	***
Panels without sidelites	Share of quantity	***	***	***
Sidelites sold separately	Share of quantity	***	***	***
All product types	Share of quantity	100.0	100.0	100.0
Further processed panels	Share of value	***	***	***
Panels with sidelites	Share of value	***	***	***
Panels without sidelites	Share of value	***	***	***
Sidelites sold separately	Share of value	***	***	***
All product types	Share of value	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”. The lines for "Further processed panels" relate to fiber glass door panels with or without sidelights that have been incorporated into or attached to out-of-scope merchandise. The quantities and values reported for "Further processed panels" relate solely to the quantity and value of the fiberglass door panels (in-scope merchandise) and exclude the quantity and/or value of any out-of-scope components or products to which it is attached.

Captive consumption

Section 771(7)(C)(iv) of the Act states that—⁹

If domestic producers internally transfer significant production of the domestic like product for the production of a downstream article and sell significant production of the domestic like product in the merchant market, and the Commission finds that—

- (I) the domestic like product produced that is internally transferred for processing into that downstream article does not enter the merchant market for the domestic like product,*
- (II) the domestic like product is the predominant material input in the production of that downstream article, and*
- (III) then the Commission, in determining market share and the factors affecting financial performance . . . , shall focus primarily on the merchant market for the domestic like product.*

Transfers and sales

As reported in table 3.9, internal consumption accounted for between *** and *** percent of U.S. producers' U.S. shipments of fiberglass door panels from 2022 to 2024.

First statutory criterion in captive consumption

The first requirement for application of the captive consumption provision is that the domestic like product that is internally transferred for processing into a downstream article not enter the merchant market for the domestic like product. Table 3.11 presents U.S. producers' production used in downstream products by type of consumption. *** U.S. producers (***) reported internal consumption of fiberglass door panels for the production of downstream pre-hung door systems. *** U.S. producer *** reported diverting fiberglass door panels intended for internal consumption to the merchant market. Between *** percent of ***'s internal consumption was sold as is in each year from 2022 to 2024.

⁹ Amended by PL 114-27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

Table 3.11 Fiberglass door panels: U.S. producers' production used in downstream products, by type of consumption and period

Quantity in units; share in percent

Item	Measure	2022	2023	2024
Internal consumption: Sold as is	Quantity	***	***	***
Internal consumption: Processed into downstream products	Quantity	***	***	***
Internal consumption: Total	Quantity	***	***	***
Internal consumption: Sold as is	Share	***	***	***
Internal consumption: Processed into downstream products	Share	***	***	***
Internal consumption: Total	Share	100.0	100.0	100.0

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

Second statutory criterion in captive consumption

The second criterion of the captive consumption provision concerns whether the domestic like product is the predominant material input in the production of the downstream article that is captively produced. Table 3.12 presents U.S. producers' fiberglass door panel contribution to downstream products. With respect to the downstream articles resulting from captive production, fiberglass door panels reportedly account for *** percent of the finished cost of downstream products.

Table 3.12 Fiberglass door panels: U.S. producers' fiberglass door panel contribution to downstream products, by material input, 2024

Share in percent

Material input	Share of value	Share of quantity
Fiberglass door panels	***	***
All other material inputs	***	***
All material inputs	100.0	100.0

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

U.S. producers' inventories

Table 3.13 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments. U.S. producers' inventories decreased by *** percent from 2022 to 2023, then increased by *** percent from 2023 to 2024, for an overall *** percent decrease between 2022 and 2024.¹⁰ The ratio of U.S. producers' inventories to U.S. production increased irregularly by *** percentage points from 2022 to 2024. Similarly, the ratios of U.S. producers' inventories to U.S. shipments and total shipments each increased irregularly by *** percentage points between 2022 and 2024.

Table 3.13 Fiberglass door panels: U.S. producers' inventories and their ratio to select items, by period

Quantity in units; ratio in percent

Item	2022	2023	2024
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.

¹⁰ *** accounted for more than half of U.S. producers' total inventories of fiberglass door panels during 2022 to 2024.

U.S. producers' imports from subject sources

As shown in tables 3.14 and 3.15, *** responding U.S. producer reported imports of fiberglass door panels from China. *** imported *** units of fiberglass door panels from China during 2024, which it explained were ***. ***'s imports from China were equivalent to less than *** percent of its U.S. production of fiberglass door panels that year.

Table 3.14 Fiberglass door panels: *'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	2022	2023	2024
U.S. production	Quantity	***	***	***
Imports from China	Quantity	***	***	***
Imports from China to U.S. production	Ratio	***	***	***

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

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

Table 3.15 Fiberglass door panels: U.S. producers' reasons for importing

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

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

U.S. producers' purchases of imports from subject sources

No responding U.S. producer reported purchases of fiberglass door panels from China during 2022 to 2024.

U.S. employment, wages, and productivity

Table 3.16 shows U.S. producers' employment-related data. The number of production and related workers ("PRWs") and unit labor costs decreased irregularly by *** percent and *** percent, respectively, between 2022 and 2024. Total hours worked, hours worked per PRW, and wages paid decreased by *** percent, *** percent, and *** percent, respectively, between 2022 and 2024, while hourly wages increased by *** percent. Productivity increased irregularly by *** percent from 2022 to 2024.

Table 3.16 Fiberglass door panels: U.S. producers' employment related information, by period

Item	2022	2023	2024
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 1,000 hours)	***	***	***
Unit labor costs (dollars per unit)	***	***	***

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

Part 4: U.S. imports, apparent U.S. consumption, and market shares

U.S. importers

The Commission issued importer questionnaires to 80 firms believed to be importers of subject fiberglass door panels, as well as to all U.S. producers of fiberglass door panels.¹ Usable questionnaire responses were received from 25 companies,² which Commission staff believe represent a majority of U.S. imports of fiberglass door panels from China in 2024.³ ⁴ Table 4.1 lists all responding U.S. importers of fiberglass door panels from China and other sources, their locations, and their shares of U.S. imports, in 2024.

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

² Ten firms (***) certified that they had not imported fiberglass door panels since January 1, 2022.

³ Fiberglass door panels are primarily imported under HTS statistical reporting number 3925.20.0010, which is a basket category that covers doors and door frames, of plastics. Both petitioner and respondents noted the inclusion of out-of-scope framing materials and parts under this HTS number. Furthermore, based on information from importer and foreign producer/exporter questionnaire responses and proprietary, Census-edited Customs' import records, Commission staff believe that a substantial majority of imports that enter under HTS statistical reporting number 3925.20.0010 is out-of-scope merchandise. Accordingly, import data presented in this report are based on data submitted in response to the Commission's importer questionnaire. Petitioner's postconference brief, p. 5; respondents' postconference brief, p. 6.

⁴ One firm reported importing fiberglass door panels (specifically sidelites) under HTS statistical reporting number 3925.20.0020, representing *** percent of reported imports from China and *** percent of reported imports from nonsubject sources between 2022 and 2024.

Table 4.1 Fiberglass door panels: U.S. importers, their headquarters, and share of imports within each source, 2024

Share in percent

Firm	Headquarters	China	Nonsubject sources	All import sources
Blevins	Nashville, TN	***	***	***
Builders Surplus	Braodview, IL	***	***	***
Cross Door	La Grange, TX	***	***	***
Discount Windows	Junction City, OR	***	***	***
Doormax	Sparta, NJ	***	***	***
Dortek	Conshohocken, PA	***	***	***
EC Barton	Jonesboro, AR	***	***	***
Global Pointe	Genoa City, WI	***	***	***
IDP	Southfield, MI	***	***	***
Jeld-Wen	Charlotte, NC	***	***	***
KS Builders	Orlando, FL	***	***	***
Liquidators Company	Dawsonville, GA	***	***	***
Mayfield	Mayfield, KY	***	***	***
Mennie Canada	Concord, ON	***	***	***
ODL	Zeeland, MI	***	***	***
Outdoor Hardware	Dover, PA	***	***	***
Owens Corning	Toledo, OH	***	***	***
Plastpro	Los Angeles, CA	***	***	***
Ryan-Al	Diamond Bar, CA	***	***	***
Starlink	Irwindale, CA	***	***	***
Steves & Sons	San Antonio, TX	***	***	***
Trimlite	Renton, WA	***	***	***
Trinity Glass	Federal Way, WA	***	***	***
Weber	Midland, ON	***	***	***
Worldwide Door	Lutz, FL	***	***	***
All firms	Various	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

Tables 4.2 and 4.3 and figure 4.1 present data for U.S. imports of fiberglass door panels from China and all other sources. During 2022 to 2024, imports from China accounted for between 51.1 and 68.5 percent of total U.S. imports by quantity and between 45.0 percent and 56.8 percent of total U.S. imports by value. Imports from China decreased by 10.6 percent in quantity and 19.4 percent in value from 2022 to 2023, then increased by 40.8 percent in quantity and 58.8 percent in value from 2023 to 2024.⁵ ⁶ Imports from nonsubject sources decreased by 57.2 percent in quantity and 49.8 percent in value from 2022 to 2023, then increased by 98.6 percent in quantity and 102.2 percent in value from 2023 to 2024.⁷ Overall, imports from China increased by 25.9 percent in quantity and 28.0 percent in value from 2022 to 2024, while imports from nonsubject sources decreased by 14.9 percent in quantity and 1.6 percent in value.

Unit values of imports from China, ranging from \$77 to \$86 per unit, were lower than unit values of imports from nonsubject sources, ranging from \$109 to \$130 per unit. Unit values of imports from China decreased by 9.9 percent from 2022 to 2023, then increased by 12.8 percent from 2023 to 2024, ending 1.6 percent higher in 2024 compared to 2022. Comparatively, unit values of imports from nonsubject sources increased by 17.2 percent from 2022 to 2023, then increased by 1.8 percent from 2023 to 2024, for an overall 19.4 percent increase between 2022 and 2024.

The ratio of imports from China to U.S. production increased from *** percent in 2022 to *** percent in 2023, then further increased to *** percent in 2024, increasing overall by *** percentage points during 2022 to 2024.

⁵ *** was the largest importer of fiberglass door panels from China, accounting for *** percent of such imports during 2022 to 2024.

⁶ The majority of responding importers of fiberglass door panels from China reported increases in imports from 2023 to 2024, with U.S. importers *** reporting the largest increases by quantity over this period.

⁷ *** were among the largest importers of fiberglass door panels from nonsubject sources, collectively accounting for approximately *** of such imports during 2022 to 2024.

Table 4.2 Fiberglass door panels: U.S. imports, by source and period

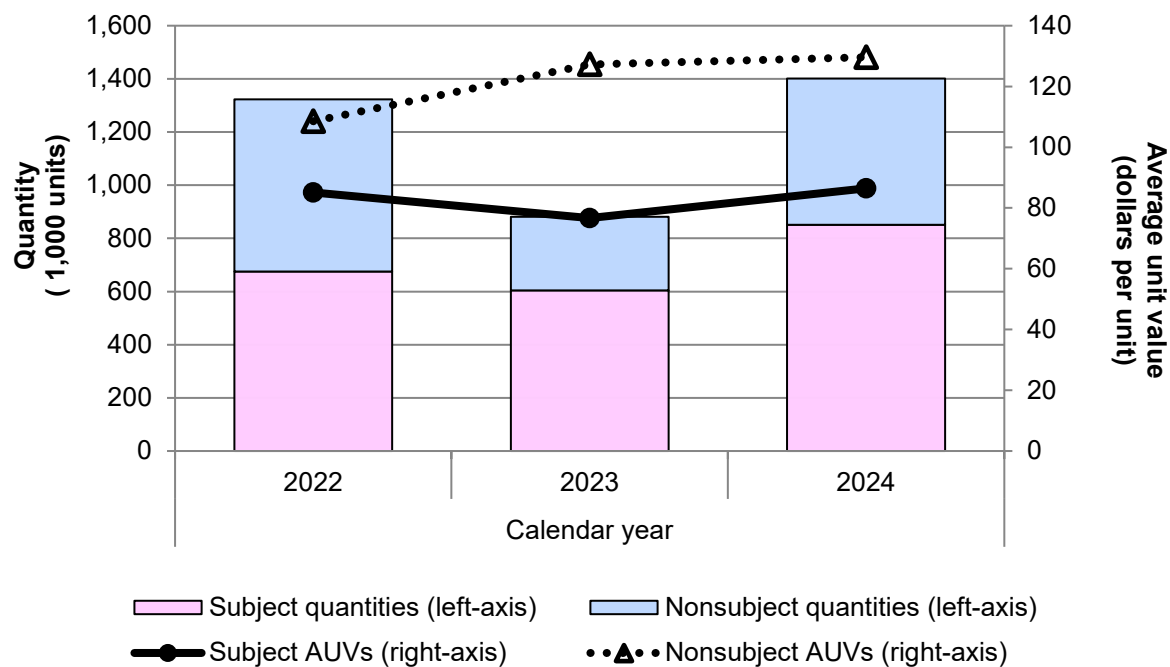
Quantity in units; value in 1,000 dollars; unit value in dollars per unit; share and ratio in percent

Source	Measure	2022	2023	2024
China	Quantity	675,456	604,084	850,661
Nonsubject sources	Quantity	647,128	277,273	550,612
All import sources	Quantity	1,322,584	881,357	1,401,273
China	Value	57,451	46,317	73,546
Nonsubject sources	Value	70,250	35,292	71,369
All import sources	Value	127,701	81,609	144,915
China	Unit value	85	77	86
Nonsubject sources	Unit value	109	127	130
All import sources	Unit value	97	93	103
China	Share of quantity	51.1	68.5	60.7
Nonsubject sources	Share of quantity	48.9	31.5	39.3
All import sources	Share of quantity	100.0	100.0	100.0
China	Share of value	45.0	56.8	50.8
Nonsubject sources	Share of value	55.0	43.2	49.2
All import sources	Share of value	100.0	100.0	100.0
China	Ratio	***	***	***
Nonsubject sources	Ratio	***	***	***
All import sources	Ratio	***	***	***

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

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

Figure 4.1 Fiberglass door panels: U.S. import quantities and average unit values, by source and period



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

Table 4.3 Fiberglass door panels: Changes in U.S. imports, by source and periodChanges (Δ) in percent (%) or percentage point (ppt)

Source	Measure	2022 to 2024	2022 to 2023	2023 to 2024
China	% Δ Quantity	▲ 25.9	▼ (10.6)	▲ 40.8
Nonsubject sources	% Δ Quantity	▼ (14.9)	▼ (57.2)	▲ 98.6
All import sources	% Δ Quantity	▲ 5.9	▼ (33.4)	▲ 59.0
China	% Δ Value	▲ 28.0	▼ (19.4)	▲ 58.8
Nonsubject sources	% Δ Value	▲ 1.6	▼ (49.8)	▲ 102.2
All import sources	% Δ Value	▲ 13.5	▼ (36.1)	▲ 77.6
China	% Δ Unit value	▲ 1.6	▼ (9.9)	▲ 12.8
Nonsubject sources	% Δ Unit value	▲ 19.4	▲ 17.2	▲ 1.8
All import sources	% Δ Unit value	▲ 7.1	▼ (4.1)	▲ 11.7
China	ppt Δ Quantity	▲ 9.6	▲ 17.5	▼ (7.8)
Nonsubject sources	ppt Δ Quantity	▼ (9.6)	▼ (17.5)	▲ 7.8
All import sources	ppt Δ Quantity	—	—	—
China	ppt Δ Value	▲ 5.8	▲ 11.8	▼ (6.0)
Nonsubject sources	ppt Δ Value	▼ (5.8)	▼ (11.8)	▲ 6.0
All import sources	ppt Δ Value	—	—	—
China	ppt Δ Ratio	▲ ***	▲ ***	▲ ***
Nonsubject sources	ppt Δ Ratio	▲ ***	▼ ***	▲ ***
All import sources	ppt Δ Ratio	▲ ***	▼ ***	▲ ***

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

Note: 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.

Tables 4.4 to 4.5 present U.S. importers' U.S. shipments of imports by product type: further processed panels, panels with sidelites, panels without sidelites, and sidelites sold separately. Panels without sidelites accounted for more than half of U.S. importers' U.S. shipments of imports from China and the vast majority of U.S. importers' U.S. shipments of imports from nonsubject sources.

Table 4.4 Fiberglass door panels: U.S. importers' U.S. shipments from China, by product type and period

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

Product type	Measure	2022	2023	2024
Further processed panels	Quantity	99,791	77,974	161,480
Panels with sidelites	Quantity	145,800	76,992	69,718
Panels without sidelites	Quantity	391,042	409,304	572,859
Sidelites sold separately	Quantity	38,823	39,814	46,604
All product types	Quantity	675,456	604,084	850,661
Further processed panels	Value	3,263	5,485	10,871
Panels with sidelites	Value	10,717	4,812	4,500
Panels without sidelites	Value	41,147	34,192	55,598
Sidelites sold separately	Value	2,325	1,828	2,579
All product types	Value	57,452	46,317	73,548
Further processed panels	Unit value	33	70	67
Panels with sidelites	Unit value	74	63	65
Panels without sidelites	Unit value	105	84	97
Sidelites sold separately	Unit value	60	46	55
All product types	Unit value	85	77	86
Further processed panels	Share of quantity	14.8	12.9	19.0
Panels with sidelites	Share of quantity	21.6	12.7	8.2
Panels without sidelites	Share of quantity	57.9	67.8	67.3
Sidelites sold separately	Share of quantity	5.7	6.6	5.5
All product types	Share of quantity	100.0	100.0	100.0
Further processed panels	Share of value	5.7	11.8	14.8
Panels with sidelites	Share of value	18.7	10.4	6.1
Panels without sidelites	Share of value	71.6	73.8	75.6
Sidelites sold separately	Share of value	4.0	3.9	3.5
All product types	Share of value	100.0	100.0	100.0

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

Note: The lines for "Further processed panels" relate to fiber glass door panels with or without sidelights that have been incorporated into or attached to out-of-scope merchandise. The quantities and values reported for "Further processed panels" relate solely to the quantity and value of the fiberglass door panels (in-scope merchandise) and exclude the quantity and/or value of any out-of-scope components or products to which it is attached.

Table 4.5 Fiberglass door panels: U.S. importers' U.S. shipments from nonsubject sources, by product type and period

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

Product type	Measure	2022	2023	2024
Further processed panels	Quantity	1,602	1,097	1,447
Panels with sidelites	Quantity	—	—	—
Panels without sidelites	Quantity	607,756	259,490	507,543
Sidelites sold separately	Quantity	37,770	16,686	41,622
All product types	Quantity	647,128	277,273	550,612
Further processed panels	Value	2,223	1,522	2,008
Panels with sidelites	Value	—	—	—
Panels without sidelites	Value	64,504	32,233	65,270
Sidelites sold separately	Value	3,523	1,537	4,091
All product types	Value	70,250	35,292	71,369
Further processed panels	Unit value	1,388	1,387	1,388
Panels with sidelites	Unit value	—	—	—
Panels without sidelites	Unit value	106	124	129
Sidelites sold separately	Unit value	93	92	98
All product types	Unit value	109	127	130
Further processed panels	Share of quantity	0.2	0.4	0.3
Panels with sidelites	Share of quantity	—	—	—
Panels without sidelites	Share of quantity	93.9	93.6	92.2
Sidelites sold separately	Share of quantity	5.8	6.0	7.6
All product types	Share of quantity	100.0	100.0	100.0
Further processed panels	Share of value	3.2	4.3	2.8
Panels with sidelites	Share of value	—	—	—
Panels without sidelites	Share of value	91.8	91.3	91.5
Sidelites sold separately	Share of value	5.0	4.4	5.7
All product types	Share of value	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”. The lines for “Further processed panels” relate to fiber glass door panels with or without sidelights that have been incorporated into or attached to out-of-scope merchandise. The quantities and values reported for “Further processed panels” relate solely to the quantity and value of the fiberglass door panels (in-scope merchandise) and exclude the quantity and/or value of any out-of-scope components or products to which it is attached.

Table 4.6 presents data for U.S. producers' and their affiliates' U.S. imports. U.S. producers *** reported imports from nonsubject sources in each year between 2022 and 2024. *** also reported imports from China in 2024.

Table 4.6 Fiberglass door panels: U.S producers' and affiliated firms' U.S. imports, by source and period

Quantity in units; share in percent

Source	Measure	2022	2023	2024
China	Quantity	***	***	***
Nonsubject sources	Quantity	***	***	***
All import sources	Quantity	***	***	***
China	Share	***	***	***
Nonsubject sources	Share	***	***	***
All import sources	Share	***	***	***

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

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

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.⁸ 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.⁹ Imports from China accounted for 55.7 percent of total imports of fiberglass door panels by quantity from March 2024 through February 2025 (table 4.7).

Table 4.7 Fiberglass door panels: U.S. imports in the twelve-month period preceding the filing of the petition, March 2024 through February 2025

Quantity in units; share in percent

Source of imports	Quantity	Share of quantity
China	824,611	55.7
Nonsubject sources	656,417	44.3
All import sources	1,481,028	100.0

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

⁸ 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)).

⁹ Section 771 (24) of the Act (19 U.S.C § 1677(24)).

Apparent U.S. consumption and market shares

Quantity

Table 4.8 and figure 4.2 present data on apparent U.S. consumption and U.S. market shares by quantity for fiberglass door panels.¹⁰ Apparent U.S. consumption by quantity decreased by *** percent during 2022 to 2023, then increased by *** percent during 2023 to 2024, for an overall *** percent decrease from 2022 to 2024. U.S. producers' U.S. shipments accounted for the largest share of apparent U.S. consumption by quantity, although that share decreased during the data collection period. U.S. producers' market share by quantity decreased irregularly by *** percentage points from 2022 to 2024, while subject import market share increased by *** percentage points over the same period. Nonsubject import market share decreased irregularly by *** percentage points between 2022 and 2024.

Table 4.8 Fiberglass door panels: Apparent U.S. total market consumption and market shares based on quantity, by source and period

Quantity in units; shares in percent

Source	Measure	2022	2023	2024
U.S. producers	Quantity	***	***	***
China	Quantity	649,571	523,508	757,214
Nonsubject sources	Quantity	622,258	333,846	512,683
All import sources	Quantity	1,271,829	857,354	1,269,897
All sources	Quantity	***	***	***
U.S. producers	Share	***	***	***
China	Share	***	***	***
Nonsubject sources	Share	***	***	***
All import sources	Share	***	***	***
All sources	Share	100.0	100.0	100.0

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

¹⁰ Information on merchant market is presented in appendix E.

Figure 4.2 Fiberglass door panels: Apparent U.S. total market consumption based on quantity, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires

Value

Table 4.9 and figure 4.3 present data on apparent U.S. consumption and U.S. market shares by value for fiberglass door panels. Apparent U.S. consumption by value decreased by *** percent from 2022 to 2023, then increased by *** percent from 2023 to 2024, for an overall *** percent decrease from 2022 to 2024. U.S. producers’ market share by value decreased irregularly by *** percentage points from 2022 to 2024, while subject import market share increased by *** percentage points. Nonsubject import market share decreased irregularly by *** percentage points during 2022 to 2024.

Table 4.9 Fiberglass door panels: Apparent U.S. total market consumption and market shares based on value, by source and period

Value in 1,000 dollars; shares in percent

Source	Measure	2022	2023	2024
U.S. producers	Value	***	***	***
China	Value	130,385	112,658	148,637
Nonsubject sources	Value	107,338	62,323	95,553
All import sources	Value	237,723	174,981	244,190
All sources	Value	***	***	***
U.S. producers	Share	***	***	***
China	Share	***	***	***
Nonsubject sources	Share	***	***	***
All import sources	Share	***	***	***
All sources	Share	100.0	100.0	100.0

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

Figure 4.3 Fiberglass door panels: Apparent U.S. total market consumption based on value, by source and period

* * * * *

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

Part 5: Pricing data

Factors affecting prices

Raw material costs

SMC is one of the most important inputs in the manufacture of fiberglass door panels. It is consumed to produce the fiberglass door skin which covers the front and rear faces. Other primary raw material costs for fiberglass door panels are wood composite, glass, polyurethane insulation foam, and glues. Figure 5.1 and table 5.1 show price indexes for fiberglass, wood, glass, and polyurethane insulation. The costs for the major raw material inputs fluctuated upwards from 2022 to 2024.

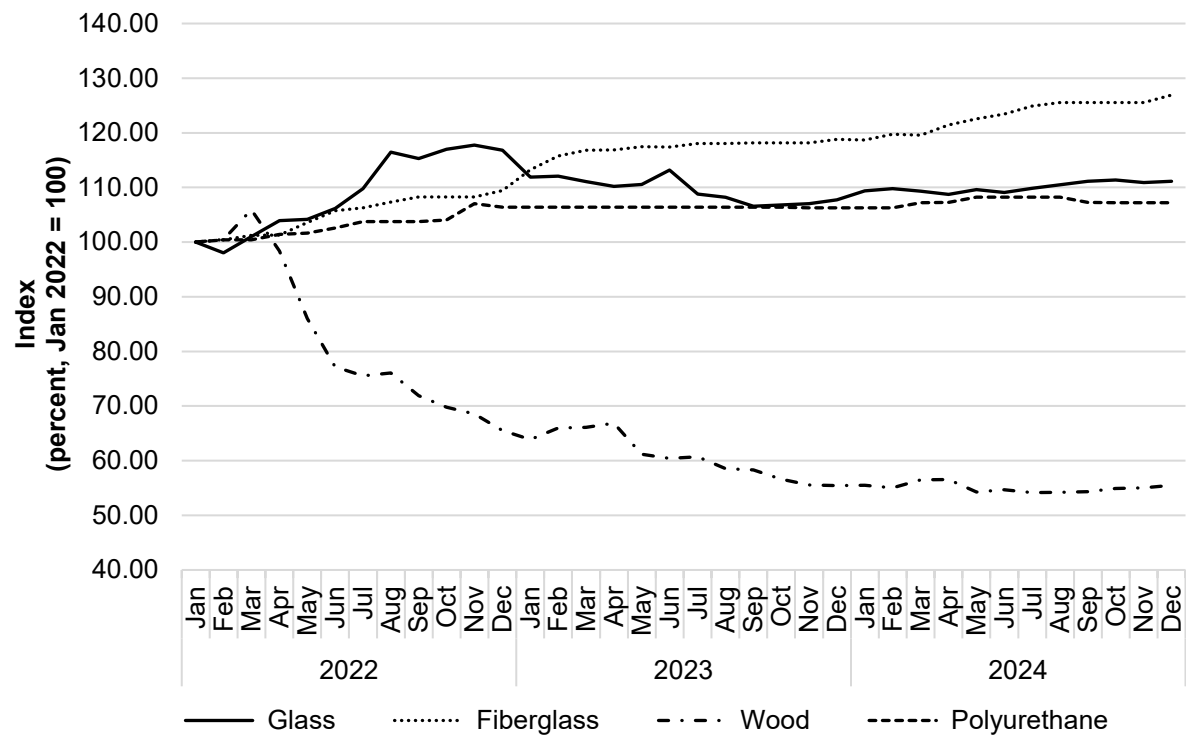
Generally, there are many chemical inputs in SMC such that no single input drives the cost of the SMC. While each producer has a slightly different formula for SMC, most formulas contain at least ***. Wood composites used in the production of fiberglass doors consist of both an LVL structural wood material and a cellular PVC cap and are used on the sides and top and bottom rails of the fiberglass door panel. Incorporating a glass lite in the fiberglass door panel adds a significant amount of cost. Typically, fiberglass door panels with more glass will cost more than fiberglass door panels with less glass. Polyurethane foam is injected into the hollow-door and sealed with a plastic cap making a structural composite and offers insulation performance that sets fiberglass door panels apart from other types of door panels, including wood and MDF.¹

Raw materials, as a share of U.S. producers' cost of goods sold (COGS), declined from *** percent in 2022 to *** percent in 2024. Each U.S. producer typically uses the same the general raw materials, but they have different cost structures and product mixes leading to different raw materials being used more than others.²

¹ Petitioners' postconference brief pp. 56-58.

² Petitioners' postconference brief p. 56.

Figure 5.1 Fiberglass door panels: Raw material price indices, by month and index



Source: U.S. Bureau of Labor Statistics, Producer Price Index by Industry: Flat Glass Manufacturing: Flat Glass (Float, Sheet, and Plate Process), Made by Flat Glass Producers ***, Producer Price Index by Commodity: Rubber and Plastic Products: All Other Reinforced and Fiberglass Plastics Products ***, Producer Price Index by Commodity: Lumber and Wood Products: Softwood Cut Stock and Dimension ***, Urethane and Other Foam Product Manufacturing: All Other Miscellaneous Polyurethane Foam Products ***, retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org>, April 16, 2025.

Note: the graphic's vertical axis is not set to zero as the point of an indexed analysis is to compare the evolution of a data series relative to the indexed period, not to zero. "Glass" represents "Flat Glass Manufacturing: Flat Glass (Float, Sheet, and Plate Process), Made by Flat Glass Producers", "Fiberglass" represents "Rubber and Plastic Products: All Other Reinforced and Fiberglass Plastics Products", "Wood" represents "Lumber and Wood Products: Softwood Cut Stock and Dimension", "Polyurethane" represents "Urethane and Other Foam Product Manufacturing: All Other Miscellaneous Polyurethane Foam Products".

Table 5.1 Fiberglass door panels: Raw material price indices, by month and index

Year	Month	Flat Glass Manufacturing: Float, sheet, and plate process	All other Reinforced and Fiberglass plastics products	Lumber and Wood Products: Softwood cut stock and dimension	All Other Miscellaneous Polyurethane Foam Products
2022	January	100.00	100.00	100.00	100.00
2022	February	98.03	100.39	100.49	100.39
2022	March	100.97	101.26	105.93	100.39
2022	April	103.95	101.29	98.34	101.42
2022	May	104.13	103.57	86.01	101.62
2022	June	106.17	105.76	77.14	102.55
2022	July	109.76	106.25	75.52	103.77
2022	August	116.46	107.34	76.04	103.77
2022	September	115.31	108.24	71.91	103.77
2022	October	117.01	108.25	69.81	104.05
2022	November	117.75	108.25	68.55	107.01
2022	December	116.81	109.45	65.50	106.40
2023	January	111.90	113.25	63.85	106.40
2023	February	112.04	115.73	65.99	106.40
2023	March	111.04	116.79	66.08	106.40
2023	April	110.21	116.88	66.86	106.41
2023	May	110.55	117.43	61.17	106.41
2023	June	113.17	117.39	60.44	106.41
2023	July	108.80	118.06	60.71	106.41
2023	August	108.20	118.06	58.53	106.41
2023	September	106.55	118.15	58.33	106.41
2023	October	106.82	118.15	56.62	106.41
2023	November	107.04	118.15	55.54	106.29
2023	December	107.74	118.81	55.44	106.29
2024	January	109.35	118.67	55.52	106.29
2024	February	109.81	119.72	55.00	106.29
2024	March	109.31	119.54	56.51	107.18
2024	April	108.74	121.45	56.52	107.25
2024	May	109.60	122.53	54.26	108.22
2024	June	109.07	123.45	54.70	108.22
2024	July	109.82	124.90	54.15	108.22
2024	August	110.49	125.56	54.21	108.22
2024	September	111.10	125.56	54.33	107.26
2024	October	111.36	125.56	54.91	107.19
2024	November	110.91	125.56	55.03	107.19
2024	December	111.15	126.91	55.48	107.19

Source: U.S. Bureau of Labor Statistics, Producer Price Index by Industry: Flat Glass Manufacturing: Flat Glass (Float, Sheet, and Plate Process), Made by Flat Glass Producers ***, Producer Price Index by Commodity: Rubber and Plastic Products: All Other Reinforced and Fiberglass Plastics Products ***, Producer Price Index by Commodity: Lumber and Wood Products: Softwood Cut Stock and Dimension ***, Urethane and Other Foam Product Manufacturing: All Other Miscellaneous Polyurethane Foam Products ***, retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org>, April 16, 2025.

Transportation costs to the U.S. market

Transportation costs for fiberglass door panels shipped from China to the United States averaged 6.9 percent during 2024. These estimates were derived from official import data and represent the transportation and other charges on imports.³

U.S. inland transportation costs

All responding U.S. producers and 18 of 22 importers reported that they typically arrange transportation to their customers. Most U.S. producers reported that their U.S. inland transportation costs ranged from 3.1 to 5.6 percent while most importers reported costs of 2.0 to 10.0 percent, while importer *** reported *** percent and importer *** reported *** percent.

Pricing practices

Pricing methods

U.S. producers and importers reported setting prices using mostly set price lists (table 5.2). U.S. Producer *** reported that while it does maintain a list price, pricing for each customer is driven by the size/volume of the customer, the regionality of the customer and the portfolio of products purchased. Importer *** reported that it determined prices according to a standard pricing guide, allowing discounts based on annual total sales volume.

³ The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2024 and then dividing by the customs value based on the HTS statistical reporting number 3925.20.0010.

Table 5.2 Fiberglass door panels: Count of U.S. producers' and importers' reported price setting methods

Method	U.S. producers	U.S. importers
Transaction-by-transaction	0	7
Contract	1	3
Set price list	4	16
Other	2	4
Responding firms	4	24

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

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

U.S. producers and importers reported selling the majority (***) percent and ***) percent, respectively) of their fiberglass door panels under annual contracts. U.S. producers sold ***) percent of their commercial shipments as spot sales while importers reported selling ***) percent under short-term contracts. (table 5.3).

Table 5.3 Fiberglass door panels: U.S. producers' and subject U.S. importers' shares of commercial U.S. shipments by type of sale, 2024

Share in percent

Sale type	U.S. producers	Subject U.S. importers
Long-term contracts	***	***
Annual contract	***	***
Short-term contracts	***	***
Spot sales	***	***
All sales types	100.0	100.0

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

One U.S. producer reported offering short-term contracts lasting *** days, all four U.S. producers offered annual contracts, one offered long-term contracts, and three offered spot sales. Three U.S. producers indicated that their annual contracts did allow price renegotiation, with two offering fixed price and one offering fixed quantity. None of the responding U.S. producers reported that their annual contracts were indexed to raw materials.

Two importers reported offering short-term contracts lasting between *** days and indicated that their short-term contracts did not allow price renegotiation and were fixed price and quantity. Four importers offered annual contracts, with two of the importers reporting that their annual contracts did allow price renegotiation, and one of the importers also allowed fixed prices. Two importers offered long contracts ranging between 366 to 730 days, and eight offered spot sales. Importer *** elaborated that it indexed contracts by the producer price index of certain commodities.

Sales terms and discounts

Three U.S. producers and nine importers reported quoting prices on a delivered basis. One U.S. producer and 10 importers reported quoting prices on a f.o.b basis. Three U.S. producers offered total volume discounts, and one offered a quantity discount. U.S. producer *** also offered a rebate program, U.S. producer *** reported that discounts were determined on a case-by-case basis, U.S. producer *** reported that on occasion it may offer a specific discount for a particular project in be competitive. Eight importers offered total quantity discounts, six offered total volume discounts, and 10 reported no discount policy. Importer *** offered a rebate program on all products sold, and importer *** reported that discounts were at the sales manager's discretion.

Price and purchase cost data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following fiberglass door panels products shipped to unrelated U.S. customers during January 2022 to December 2024. Firms that imported these products from China for their own use or retail sale were requested to provide import purchase cost data.

Product 1.-- Six-panel door panel made of fiberglass skins and a foam core, with dimensions of 35 3/4" - 36" wide by 79 - 79 1/4" tall, unglazed, without hinge or bore prep and unfinished, not prehung.

Product 2.-- Two-panel square top door panel made of fiberglass skins and a foam core, with dimensions of 35 3/4" - 36" wide by 79 - 79 1/4" tall, unglazed, without hinge or bore prep and unfinished, not prehung.

Product 3.-- Two-panel Craftsman style door panel with recessed shaker panel made of fiberglass skins and a foam core, flush glazed dual pane Low E insulated glass or clear glass with a dimension of approximately 22"-23" wide by 15-16" tall located at the top of the door panel, with overall door panel dimensions of 35 3/4" - 36" wide by 79-79 1/4" tall, without hinge or bore prep and unfinished, not prehung.

Product 4.-- Full lite flush glazed door made of fiberglass skins and a foam core, flush glazed dual pane Low E insulated glass or clear glass with a dimension of approximately 22-25" wide by 63-65" tall, with an overall door panel dimension of 35 3/4" - 36" wide by 79-79 1/4" tall, without hinge or bore prep and unfinished, not prehung.

Price data

Three U.S. producers and 10 importers⁴ 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 U.S. shipments of fiberglass door panels, and *** percent of imports from China in 2024.⁶ Price data for products 1 through 4 are presented in tables 5.4 to 5.7 and figures 5.2 to 5.5.

The ***.

⁴ ***.

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

⁶ Pricing coverage is based on imports reported in questionnaires.

Table 5.4 Fiberglass door panels: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, and margins of underselling/(overselling), by source and quarter

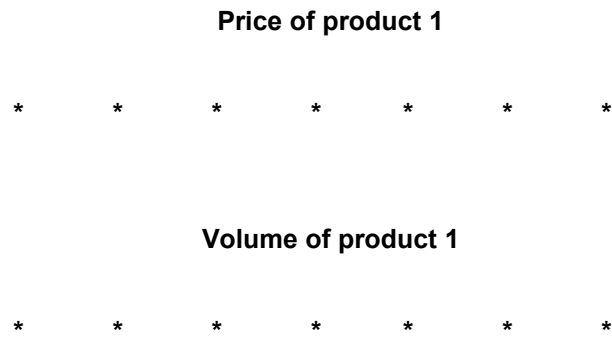
Quantity in units; Prices in dollars per unit; Margins in percent

Period	U.S. price	U.S. quantity	China price	China quantity	China margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***

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

Note: Product 1: Six-panel door panel made of fiberglass skins and a foam core, with dimensions of 35 3/4" - 36" wide by 79 - 79 1/4" tall, unglazed, without hinge or bore prep and unfinished, not prehung.

Figure 5.2 Fiberglass door panels: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by source and quarter



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

Note: Product 1: Six-panel door panel made of fiberglass skins and a foam core, with dimensions of 35 3/4" - 36" wide by 79 - 79 1/4" tall, unglazed, without hinge or bore prep and unfinished, not prehung.

Table 5.5 Fiberglass door panels: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, and margins of underselling/(overselling), by source and quarter

Quantity in units; Prices in dollars per unit; Margins in percent

Period	U.S. price	U.S. quantity	China price	China quantity	China margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***

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

Note: Product 2: Two-panel square top door panel made of fiberglass skins and a foam core, with dimensions of 35 3/4" - 36" wide by 79 - 79 1/4" tall, unglazed, without hinge or bore prep and unfinished, not prehung.

Figure 5.3 Fiberglass door panels: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by source and quarter

Price of product 2

* * * * *

Volume of product 2

* * * * *

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

Note: Product 2: Two-panel square top door panel made of fiberglass skins and a foam core, with dimensions of 35 3/4" - 36" wide by 79 - 79 1/4" tall, unglazed, without hinge or bore prep and unfinished, not prehung.

Table 5.6 Fiberglass door panels: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, and margins of underselling/(overselling), by source and quarter

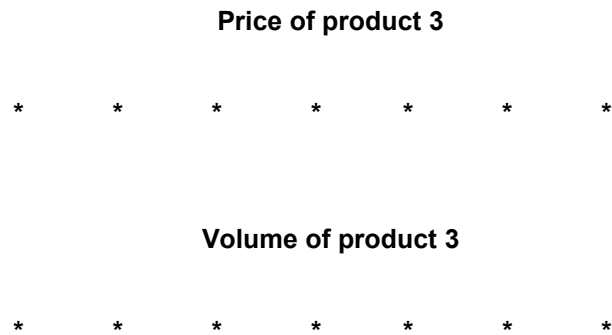
Quantity in units; Prices in dollars per unit; Margins in percent

Period	U.S. price	U.S. quantity	China price	China quantity	China margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***

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

Note: Product 3: Two-panel Craftsman style door panel with recessed shaker panel made of fiberglass skins and a foam core, flush glazed dual pane Low E insulated glass or clear glass with a dimension of approximately 22"-23" wide by 15-16" tall located at the top of the door panel, with overall door panel dimensions of 35 3/4" - 36" wide by 79-79 1/4" tall, without hinge or bore prep and unfinished, not prehung.

Figure 5.4 Fiberglass door panels: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by source and quarter



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

Note: Product 3: Two-panel Craftsman style door panel with recessed shaker panel made of fiberglass skins and a foam core, flush glazed dual pane Low E insulated glass or clear glass with a dimension of approximately 22"-23" wide by 15-16" tall located at the top of the door panel, with overall door panel dimensions of 35 3/4" - 36" wide by 79-79 1/4" tall, without hinge or bore prep and unfinished, not prehung.

Table 5.7 Fiberglass door panels: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, and margins of underselling/(overselling), by source and quarter

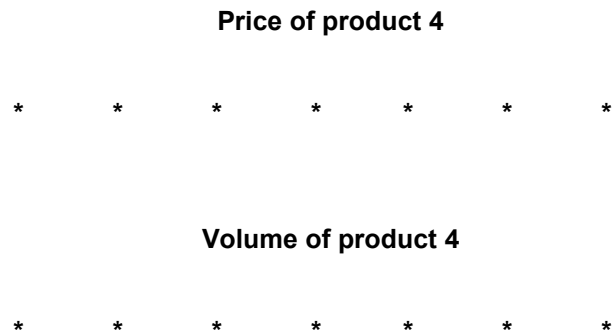
Quantity in units; Prices in dollars per unit; Margins in percent

Period	U.S. price	U.S. quantity	China price	China quantity	China margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***

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

Note: Product 4: Full lite flush glazed door made of fiberglass skins and a foam core, flush glazed dual pane Low E insulated glass or clear glass with a dimension of approximately 22-25" wide by 63-65" tall, with an overall door panel dimension of 35 3/4" - 36" wide by 79-79 1/4" tall, without hinge or bore prep and unfinished, not prehung.

Figure 5.5 Fiberglass door panels: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, by source and quarter



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

Note: Product 4: Full lite flush glazed door made of fiberglass skins and a foam core, flush glazed dual pane Low E insulated glass or clear glass with a dimension of approximately 22-25" wide by 63-65" tall, with an overall door panel dimension of 35 3/4" - 36" wide by 79-79 1/4" tall, without hinge or bore prep and unfinished, not prehung.

Import purchase cost data

Eight importers reported usable import purchase cost data for products 1-4.⁷ Purchase cost data reported by these firms accounted for *** percent of imports from China in 2024. Landed duty-paid purchase cost data for imports from China are presented in tables 5.8 to 5.11, along with U.S. producers' sales prices.⁸

Importers reporting import purchase cost data were asked to provide additional information regarding the costs and benefits of importing fiberglass door panels themselves.

Three of 15 importers reported that they incurred additional costs beyond landed duty-paid costs by importing fiberglass door panels themselves rather than purchasing from a U.S. producer or U.S. importer. Of these, three importers estimated the total additional cost incurred; estimates ranged from 1.0 to 6.0 percent compared to the landed duty-paid value. Firms were also asked to identify specific additional costs they incurred as a result of importing fiberglass door panels. Reported costs include tariffs and other customs clearing fees, freight from port to warehouses, and specific policies to cover ocean freight.

Seven of 19 responding importers reported that they compare costs of importing to the cost of purchasing from a U.S. producer in determining whether to import fiberglass door panels, four importers compare costs to purchasing from a U.S. importer, and eight importers do not compare costs of purchasing from either U.S. producers or importers.

15 importers identified benefits from importing fiberglass door panels themselves instead of purchasing from U.S. producers or importers, including lower cost, availability, good quality, greater ability for customizing the panels, and importer *** reported that the major U.S. door manufacturers do not produce a lower end door.

Firms were also asked whether the import cost (both excluding and including additional costs) of fiberglass door panels they imported are lower than the price of purchasing fiberglass door panels from a U.S. producer or importer.

Six importers estimated that they saved between *** percent of the purchase price by importing fiberglass door panels rather than purchasing from a U.S. importer, and seven

⁷ ***.

⁸ 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.

importers estimated saving between *** percent compared to purchasing the product from a U.S. producer.⁹

The ***.

Table 5.8 Fiberglass door panels: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, and margins of underselling/(overselling), by source and quarter

Quantity in units; Prices and unit LDP values in dollars per unit; Differentials in percent

Period	U.S. price	U.S. quantity	China unit LDP value	China quantity	China differential
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***

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

Note: Product 1: Six-panel door panel made of fiberglass skins and a foam core, with dimensions of 35 3/4" - 36" wide by 79 - 79 1/4" tall, unglazed, without hinge or bore prep and unfinished, not prehung.

Note: U.S. producer price data is the same as that presented in table 5.4.

⁹ Five firms reported that they based their estimates on previous company transactions, five reported basing their estimates on market research, and three reported other bases for their estimates, including local vendors.

Figure 5.6 Fiberglass door panels: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by source and 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: Six-panel door panel made of fiberglass skins and a foam core, with dimensions of 35 3/4" - 36" wide by 79 - 79 1/4" tall, unglazed, without hinge or bore prep and unfinished, not prehung.

Table 5.9 Fiberglass door panels: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, and margins of underselling/(overselling), by source and quarter

Quantity in units; Prices and unit LDP values in dollars per unit; Differentials in percent

Period	U.S. price	U.S. quantity	China unit LDP value	China quantity	China differential
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***

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

Note: Product 2: Two-panel square top door panel made of fiberglass skins and a foam core, with dimensions of 35 3/4" - 36" wide by 79 - 79 1/4" tall, unglazed, without hinge or bore prep and unfinished, not prehung.

Note: U.S. producer price data is the same as that presented in table 5.5.

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 5.7 Fiberglass door panels: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by source and 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: Two-panel square top door panel made of fiberglass skins and a foam core, with dimensions of 35 3/4" - 36" wide by 79 - 79 1/4" tall, unglazed, without hinge or bore prep and unfinished, not prehung.

Table 5.10 Fiberglass door panels: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, and margins of underselling/(overselling), by source and quarter

Quantity in units; Prices and unit LDP values in dollars per unit; Differentials in percent

Period	U.S. price	U.S. quantity	China unit LDP value	China quantity	China differential
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***

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

Note: Product 3: Two-panel Craftsman style door panel with recessed shaker panel made of fiberglass skins and a foam core, flush glazed dual pane Low E insulated glass or clear glass with a dimension of approximately 22"-23" wide by 15-16" tall located at the top of the door panel, with overall door panel dimensions of 35 3/4" - 36" wide by 79-79 1/4" tall, without hinge or bore prep and unfinished, not prehung.

Note: U.S. producer price data is the same as that presented in table 5.6.

Figure 5.8 Fiberglass door panels: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by source and 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: Two-panel Craftsman style door panel with recessed shaker panel made of fiberglass skins and a foam core, flush glazed dual pane Low E insulated glass or clear glass with a dimension of approximately 22"-23" wide by 15-16" tall located at the top of the door panel, with overall door panel dimensions of 35 3/4" - 36" wide by 79-79 1/4" tall, without hinge or bore prep and unfinished, not prehung.

Table 5.11 Fiberglass door panels: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, and margins of underselling/(overselling), by source and quarter

Quantity in units; Prices and unit LDP values in dollars per unit; Differentials in percent

Period	U.S. price	U.S. quantity	China unit LDP value	China quantity	China differential
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***

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

Note: Product 4: Full lite flush glazed door made of fiberglass skins and a foam core, flush glazed dual pane Low E insulated glass or clear glass with a dimension of approximately 22-25" wide by 63-65" tall, with an overall door panel dimension of 35 3/4" - 36" wide by 79-79 1/4" tall, without hinge or bore prep and unfinished, not prehung

Note: U.S. producer price data is the same as that presented in table 5.7.

Figure 5.9 Fiberglass door panels: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, by source and 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: Full lite flush glazed door made of fiberglass skins and a foam core, flush glazed dual pane Low E insulated glass or clear glass with a dimension of approximately 22-25" wide by 63-65" tall, with an overall door panel dimension of 35 3/4" - 36" wide by 79-79 1/4" tall, without hinge or bore prep and unfinished, not prehung

Price and purchase cost trends

In general, prices increased during January 2022 to December 2024. Table 5.12 summarizes the price trends, by country and by product. As shown in the table, domestic price increases ranged from *** to *** percent during January 2022 to December 2024 while import price increases ranged from *** to *** percent. Landed duty-paid cost increases ranged from a *** percent to *** percent.

Tables 5.13 to 5.15 and figures 5.10 to 5.13 show indexed prices and purchase cost data to more easily compare changes during the period of investigation.

Table 5.12 Fiberglass door panels: Summary of price data, by product and source, January 2022 through December 2024

Prices and unit LDP values in dollars per unit; Quantity in units; Change in percent

Product	Source	Number of quarters	Quantity	Low price	High price	First quarter price	Last quarter price	Change over period
Product 1	United States	12	***	***	***	***	***	***
Product 1	China - price	12	***	***	***	***	***	***
Product 1	China - cost	12	***	***	***	***	***	***
Product 2	United States	12	***	***	***	***	***	***
Product 2	China - price	12	***	***	***	***	***	***
Product 2	China - cost	8	***	***	***	***	***	***
Product 3	United States	12	***	***	***	***	***	***
Product 3	China - price	12	***	***	***	***	***	***
Product 3	China - cost	12	***	***	***	***	***	***
Product 4	United States	12	***	***	***	***	***	***
Product 4	China - price	12	***	***	***	***	***	***
Product 4	China - cost	12	***	***	***	***	***	***

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

Table 5.13 Fiberglass door panels: Indexed U.S. producer prices, by quarter

Index in percent, 2022 Q1= 100.0 percent

Period	Product 1	Product 2	Product 3	Product 4
2022 Q1	100.0	100.0	100.0	100.0
2022 Q2	***	***	***	***
2022 Q3	***	***	***	***
2022 Q4	***	***	***	***
2023 Q1	***	***	***	***
2023 Q2	***	***	***	***
2023 Q3	***	***	***	***
2023 Q4	***	***	***	***
2024 Q1	***	***	***	***
2024 Q2	***	***	***	***
2024 Q3	***	***	***	***
2024 Q4	***	***	***	***

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

Figure 5.10 Fiberglass door panels: Indexed U.S. producer prices, by quarter

* * * * *

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

Table 5.14 Fiberglass door panels: Indexed subject U.S. importer prices, by quarter

Index in percent, 2022 Q1= 100.0 percent

Period	Product 1	Product 2	Product 3	Product 4
2022 Q1	100.0	100.0	100.0	100.0
2022 Q2	***	***	***	***
2022 Q3	***	***	***	***
2022 Q4	***	***	***	***
2023 Q1	***	***	***	***
2023 Q2	***	***	***	***
2023 Q3	***	***	***	***
2023 Q4	***	***	***	***
2024 Q1	***	***	***	***
2024 Q2	***	***	***	***
2024 Q3	***	***	***	***
2024 Q4	***	***	***	***

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

Figure 5.11 Fiberglass door panels: Indexed subject U.S. importer prices, by quarter

* * * * *

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

Table 5.15 Fiberglass door panels: Indexed subject U.S. importer unit purchase costs, by quarter

Index in percent, 2022 Q1= 100.0 percent

Period	Product 1	Product 2	Product 3	Product 4
2022 Q1	100.0	—	100.0	100.0
2022 Q2	***	—	***	***
2022 Q3	***	—	***	***
2022 Q4	***	100.0	***	***
2023 Q1	***	—	***	***
2023 Q2	***	***	***	***
2023 Q3	***	***	***	***
2023 Q4	***	***	***	***
2024 Q1	***	***	***	***
2024 Q2	***	***	***	***
2024 Q3	***	***	***	***
2024 Q4	***	***	***	***

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

Figure 5.12 Fiberglass door panels: Indexed subject U.S. importer prices, by quarter

* * * * *

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

Price and purchase cost comparisons

Price comparisons

As shown in tables 5.16 and 5.17, prices for product imported from China were below those for U.S.-produced product in 44 of 48 instances (** units); margins of underselling ranged from ** to ** percent. In the remaining four instances (** units), prices for product from China were between ** and ** percent above prices for the domestic product. Instances of underselling were distributed relatively evenly throughout the period of investigation.

Table 5.16 Fiberglass door panels: Instances and quantities of underselling/overselling and the range and average of margins, by product

Quantity in units; Margins in percent

Products	Type	Number of instances	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	12	**	**	**	**
Product 2	Underselling	8	**	**	**	**
Product 3	Underselling	12	**	**	**	**
Product 4	Underselling	12	**	**	**	**
All products	Underselling	44	**	**	**	**
Product 1	Overselling	—	**	**	**	**
Product 2	Overselling	4	**	**	**	**
Product 3	Overselling	—	**	**	**	**
Product 4	Overselling	—	**	**	**	**
All products	Overselling	4	**	**	**	**

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

Table 5.17 Fiberglass door panels: Instances and quantities of underselling/overselling and the range and average of margins, by period

Quantity in units; Margins in percent

Period	Type	Number of instances	Quantity	Average margin	Min margin	Max margin
2022	Underselling	16	***	***	***	***
2023	Underselling	16	***	***	***	***
2024	Underselling	12	***	***	***	***
All periods	Underselling	44	***	***	***	***
2022	Overselling	—	***	***	***	***
2023	Overselling	—	***	***	***	***
2024	Overselling	4	***	***	***	***
All periods	Overselling	4	***	***	***	***

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

Note: Instances represent the number of valid comparisons included where there was both a domestic price and subject import price comparison reported by the specified criteria. Margins present the price differences between subject product and domestic product, with positive margins indicating subject pricing was below domestic pricing and negative margins indicating subject pricing was above domestic pricing in the specified comparisons. Zeroes and null values are suppressed and shown as “—”.

Price-cost comparisons

As shown in tables 5.18 and 5.19, landed duty-paid costs for fiberglass door panels imported from China were below the sales price for U.S.-produced product in all 44 instances (*** units); price-cost differentials ranged from *** to *** percent.

Table 5.18 Fiberglass door panels: Instances and quantities of lower/(higher) average unit purchase costs compared to U.S. prices and the range and average of price/cost differentials, by product

Quantity in units; Differentials in percent

Products	Type	Number of instances	Quantity	Average differential	Min differential	Max differential
Product 1	Lower than US	12	***	***	***	***
Product 2	Lower than US	8	***	***	***	***
Product 3	Lower than US	12	***	***	***	***
Product 4	Lower than US	12	***	***	***	***
All products	Lower than US	44	***	***	***	***
Product 1	Higher than US	—	***	***	***	***
Product 2	Higher than US	—	***	***	***	***
Product 3	Higher than US	—	***	***	***	***
Product 4	Higher than US	—	***	***	***	***
All products	Higher than US	—	***	***	***	***

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

Table 5.19 Fiberglass door panels: Instances and quantities of lower/(higher) average unit purchase costs compared to U.S. prices and the range and average of price/cost differentials, by period

Quantity in units; Differentials in percent

Period	Type	Number of instances	Quantity	Average differential	MIn differential	Max differential
2022	Lower than U.S.	13	***	***	***	***
2023	Lower than U.S.	15	***	***	***	***
2024	Lower than U.S.	16	***	***	***	***
All periods	Lower than U.S.	44	***	***	***	***
2022	Higher than U.S.	—	***	***	***	***
2023	Higher than U.S.	—	***	***	***	***
2024	Higher than U.S.	—	***	***	***	***
All periods	Higher than U.S.	—	***	***	***	***

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

Note: Instances represent the number of valid comparisons included where there was both a domestic price and subject import price comparison reported by the specified criteria. Margins present the price differences between subject product and domestic product, with positive margins indicating subject pricing was below domestic pricing and negative margins indicating subject pricing was above domestic pricing in the specified comparisons. Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

Lost sales and lost revenue

The Commission requested that U.S. producers of fiberglass door panels report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of fiberglass door panels from China during 2022 to 2024. Of the four responding U.S. producers, three reported that they had to reduce prices, three reported that they had to roll back announced price increases, and three firms reported that they had lost sales. Three U.S. producers submitted lost sales and lost revenue allegations. The three responding U.S. producers identified 26 firms with which they lost sales or revenue (5 consisting lost sales allegations, 7 consisting of lost revenue allegations, and 14 consisting of both types of allegations).

Staff contacted 23 purchasers and received responses from 10 purchasers. Responding purchasers reported purchasing 5.4 million fiberglass door panels during January 2022 to December 2024 (table 5.20).

During 2024, responding purchasers purchased 70.1 percent from U.S. producers, 21.2 percent from China, and 8.7 percent from nonsubject countries. Purchasers were asked about changes in their purchasing patterns from different sources since 2022 (table 5.21). Of the responding purchasers, seven reported decreasing purchases from domestic producers, one

reported increasing purchases, and two did not purchase any domestic product.¹⁰ As explanations for decreasing purchases of domestic product, purchaser *** reported that increased price pressure from foreign imports had eroded its market share with domestic manufacturers. Purchaser *** reported that it had been importing product because of product quality and reliability; additionally, it saw a decrease in volume in its U.S. locations and as more of its competition sourced Chinese made fiberglass doors it felt as if it did not have an option other than to import. Purchaser *** reported that domestic “quality & delivery of product declined” while imports from China were better quality and were offered in a variety of styles.

Of the 10 responding purchasers, seven reported that, since 2022, they had purchased imported fiberglass door panels from China instead of U.S.-produced product. Five of these purchasers reported that subject import prices were lower than U.S.-produced product, and two of these purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product. Two purchasers estimated the quantity of fiberglass door panels from China purchased instead of domestic product; quantities ranged from *** to *** units (table 5.22). Purchasers identified availability, quality, communication, support, better designs and more panel sizes as non-price reasons for purchasing imported rather than U.S.-produced product.

Of the 10 responding purchasers, four reported that U.S. producers had reduced prices in order to compete with lower-priced imports from China (table 5.23). The reported estimated price reduction ranged from *** to *** percent. In describing the price reductions, purchasers indicated that the price reductions were as competitive response to purchases of Chinese imports.

In responding to the lost sales lost revenue survey, some purchasers provided additional information on purchases and market dynamics. Purchaser *** reported that the availability of fiberglass doors from 2021 to 2023 was inconsistent during one of the largest building booms in recent memory. Chinese supply helped fill those gaps when needed and allowed for companies to find alternatives when domestic fiberglass door sources were difficult to find.

¹⁰ Of the ten responding purchasers, none of the purchasers indicated that they did not know the source of the fiberglass door panels they purchased.

Table 5.20 Fiberglass door panels: U.S. purchasers' reported purchases and imports, by firm and source, January 2022 through December 2024

Quantity in units; Change in shares in percentage points

Firm	Domestic quantity	Subject quantity	All other quantity	Change in domestic share	Change in subject share	Change in all other share
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
All firms	4,212,039	810,241	452,007	(11.1)	9.8	1.3

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

Table 5.21 Fiberglass door panels: Count of changes in purchase patterns from U.S., subject, and nonsubject countries

Count in number of firms reporting

Source of purchases	Steadily Increase	Fluctuate Up	No change	Fluctuate Down	Steadily Decrease	Did not purchase
United States	0	1	0	4	3	2
China	5	4	0	0	0	0
All other sources	0	2	0	1	0	2
Sources unknown	0	0	0	0	0	4

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

Table 5.22 Fiberglass door panels: U.S. purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in units

Firm	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Narrative on reasons for purchasing imports
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All firms	Yes: 7; No: 3	Yes: 5; No: 2	Yes: 2; No: 5	***	

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

Table 5.23 Fiberglass door panels: U.S. purchasers' responses to U.S. producer price reductions, by firm

Count in number of firms reporting; Price reductions in percent

Firm	Producers lowered prices	Price reduction	Narrative on producer price reductions
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
All firms	Yes: 4; No: 6	***	NA

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

Part 6: Financial experience of U.S. producers

Background¹

Owens Corning, Plastpro, and Therma-Tru provided usable financial results on their fiberglass door panel operations.² U.S. producers reported financial data based on a calendar year and *** on the basis of GAAP.³ The industry's net sales are composed of commercial sales and internal consumption.⁴ During the period examined, January 1, 2022, through December 31, 2024, commercial sales represented *** percent of total net sales quantity and internal consumption represented *** percent.^{5 6}

Figure 6.1 presents each responding firm's share of the total reported net sales quantity for the total market in 2024.⁷

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 The trade and financial sections reconciled for Owens Corning, Plastpro, and Therma-Tru. ***, ***. U.S. producer questionnaire response, section 3.14; Email from ***, April 10, 2025.

³ ***. U.S. producer questionnaire response, section 3.2.

⁴ ***. U.S. producer questionnaire response, section 3.14.

⁵ ***. Email from ***, April 21, 2025.

⁶ ***. Email from ***, April 21, 2025.

⁷ This section of the staff report discusses U.S. producers' total market operations in the fiberglass industry. For financial results for the merchant market, see appendix E.

Figure 6.1 Fiberglass door panels: U.S. producers’ share of net sales quantity for the total market in 2024, by firm

* * * * *

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

Operations on fiberglass door panels

Table 6.1 presents data on the U.S. producers’ total operations in relation to fiberglass door panels, while table 6.2 presents corresponding changes in AUVs. Table 6.3 presents selected company-specific financial data.

Table 6.1 Fiberglass door panels: U.S. producers' results of total market operations, by item and period

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

Item	Measure	2022	2023	2024
Commercial sales	Quantity	***	***	***
Internal consumption	Quantity	***	***	***
Total net sales	Quantity	***	***	***
Commercial sales	Value	***	***	***
Internal consumption	Value	***	***	***
Total net sales	Value	***	***	***
COGS: Raw materials	Value	***	***	***
COGS: Direct labor	Value	***	***	***
COGS: Other factory	Value	***	***	***
COGS: Total	Value	***	***	***
Gross profit or (loss)	Value	***	***	***
SG&A expenses	Value	***	***	***
Operating income or (loss)	Value	***	***	***
Interest expense	Value	***	***	***
All other expenses	Value	***	***	***
All other income	Value	***	***	***
Net income or (loss)	Value	***	***	***
Depreciation/amortization	Value	***	***	***
Cash flow	Value	***	***	***
COGS: Raw materials	Ratio to NS	***	***	***
COGS: Direct labor	Ratio to NS	***	***	***
COGS: Other factory	Ratio to NS	***	***	***
COGS: Total	Ratio to NS	***	***	***
Gross profit	Ratio to NS	***	***	***
SG&A expense	Ratio to NS	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***
Net income or (loss)	Ratio to NS	***	***	***

Table continued.

Table 6.1 (Continued) Fiberglass door panels: U.S. producers' results of total market operations, by item and period

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

Item	Measure	2022	2023	2024
COGS: Raw materials	Share of COGS	***	***	***
COGS: Direct labor	Share of COGS	***	***	***
COGS: Other factory	Share of COGS	***	***	***
COGS: Total	Share of COGS	100.0	100.0	100.0
Commercial sales	Unit value	***	***	***
Internal consumption	Unit value	***	***	***
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	3	3	3

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

Table 6.2 Fiberglass door panels: Changes in AUVs between comparison periods for the total market

Changes in percent

Item	2022–24	2022–23	2023–24
Commercial sales	▲ ***	▲ ***	▼ ***
Internal consumption	▲ ***	▲ ***	▼ ***
Total net sales	▲ ***	▲ ***	▼ ***
COGS: Raw materials	▼ ***	▼ ***	▲ ***
COGS: Direct labor	▲ ***	▲ ***	▲ ***
COGS: Other factory	▲ ***	▲ ***	▼ ***
COGS: Total	▲ ***	▼ ***	▲ ***

Table continued.

Table 6.2 (Continued) Fiberglass door panels: Changes in AUVs between comparison periods for the total market

Changes in dollars per unit

Item	2022–24	2022–23	2023–24
Commercial sales	▲ ***	▲ ***	▼ ***
Internal consumption	▲ ***	▲ ***	▼ ***
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: Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

Table 6.3: Fiberglass door panels: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales quantity

Quantity in units

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Fiberglass door panels: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales value

Value in 1,000 dollars

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Fiberglass door panels: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS

Value in 1,000 dollars

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Fiberglass door panels: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss)

Value in 1,000 dollars

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Fiberglass door panels: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses

Value in 1,000 dollars

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Fiberglass door panels: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss)

Value in 1,000 dollars

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Fiberglass door panels: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss)

Value in 1,000 dollars

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Fiberglass door panels: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS to net sales ratio

Ratios in percent

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Fiberglass door panels: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss) to net sales ratio

Ratios in percent

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Fiberglass door panels: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses to net sales ratio

Ratios in percent

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Fiberglass door panels: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss) to net sales ratio

Ratios in percent

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Fiberglass door panels: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss) to net sales ratio

Ratios in percent

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Fiberglass door panels: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net sales value

Unit values in dollars per unit

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Fiberglass door panels: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit raw material costs

Unit values in dollars per unit

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Fiberglass door panels: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit direct labor costs

Unit values in dollars per unit

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Fiberglass door panels: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit other factory costs

Unit values in dollars per unit

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Fiberglass door panels: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit COGS

Unit values in dollars per unit

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Fiberglass door panels: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit gross profit or (loss)

Unit values in dollars per unit

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Fiberglass door panels: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit SG&A expenses

Unit values in dollars per unit

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Fiberglass door panels: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit operating income or (loss)

Unit values in dollars per unit

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

Table continued.

Table 6.3 (Continued) Fiberglass door panels: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net income or (loss)

Unit values in dollars per unit

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

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

Note: Shares represent the share of COGS.

Net sales

As shown in table 6.1, the quantity of the industry's total market net sales quantity and value decreased overall between 2022 and 2024. Net sales quantity for the total market decreased overall by *** percent and net sales value decreased overall by *** percent between 2022 and 2024. The industry's total net sales AUV increased irregularly from \$*** per unit in 2022 to \$*** per unit in 2024.

Cost of goods sold and gross profit or loss

Table 6.1 shows that raw material costs, direct labor, and other factory costs accounted for ***, **, and ** percent of total market COGS, respectively, in 2024. Total raw material costs decreased irregularly from \$*** in 2022 to \$*** in 2024. On a per-unit basis, raw material costs decreased irregularly from \$*** in 2022 to \$*** in 2024. As presented in table 6.3, individual firm's raw materials AUVs varied, driven partially by product mix.⁸ Table 6.4 presents raw materials, by type.

⁸ ***. Email from ***, April 21, 2025, and April 22, 2025.

Table 6.4 Fiberglass door panels: U.S. producers' total market raw material costs in 2024, by major material inputs

Value in 1,000 dollars; unit values in dollars per unit; share of value in percent

Item	Value	Unit value	Share of value
Sheet molded compound	***	***	***
Wood composite	***	***	***
Glass components for windows	***	***	***
Insulation	***	***	***
Other material inputs	***	***	***
All raw materials	***	***	100.0

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

The industry's cost of direct labor decreased irregularly from \$*** in 2022 to \$*** in 2024. The average unit cost of direct labor increased from \$*** from 2022 to \$*** in 2024.⁹

Other factory costs decreased irregularly from \$*** in 2022 to \$*** in 2024. On a per-unit basis, other factory costs increased irregularly from \$*** in 2022 to \$*** in 2024.¹⁰

Total COGS decreased irregularly by *** percent, from \$*** in 2022 to \$*** in 2024. The decrease in total COGS was larger than the decrease in net sales value, which resulted in gross profit increasing overall from \$*** in 2022 to \$*** in 2024.

Total market COGS as a ratio to net sales value decreased irregularly from *** percent in 2022 to *** percent in 2024. Gross profit as a ratio to net sales increased irregularly from *** percent to *** percent from 2022 to 2024.

⁹ ***. Email from ***, April 21, 2025, and April 22, 2025.

¹⁰ ***. Email from ***, April 21, 2025, and April 22, 2025.

SG&A expenses and operating income or loss

Table 6.1 shows that total market SG&A expenses increased irregularly from \$*** in 2022 to \$*** in 2024. The SG&A expense ratio (SG&A expenses as a share of sales) increased from *** percent in 2022 to *** percent in 2024.¹¹

Total market operating income decreased irregularly from \$*** in 2022 to \$*** in 2024. The operating margin (operating income as a ratio to net sales) decreased irregularly from *** percent in 2022 to *** percent in 2024.

¹¹ ***. Email from ***, April 21, 2025, and April 22, 2025.

All other expenses and net income or loss

Classified below the total market operating income level are interest expense, other expense, and other income, which are listed in table 6.1. Interest expenses increased irregularly from \$*** in 2022 to \$*** in 2024. All other expenses increased irregularly from \$*** in 2022 to \$*** in 2024.¹²

Total market net income decreased overall from \$*** in 2022 to \$*** in 2024, an *** percent decrease from 2022 to 2024.¹³

¹² ***.

¹³ A variance analysis is not presented here because of ***.

Capital expenditures and research and development expenses

Table 6.5 presents capital expenditures, by firm, and table 6.7 presents R&D expenses, by firm. Tables 6.6 and 6.8 present the firms' narrative explanations of the nature, focus, and significance of their capital expenditures and R&D expenses, respectively. For capital expenditures, there was *** of *** percent for the industry from 2022 to 2024. For R&D expenses, there was *** of *** percent from 2022 to 2024.

Table 6.5 Fiberglass door panels: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

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

Table 6.6 Fiberglass door panels: U.S. producers' narrative descriptions of their capital expenditures, by firm

Firm	Narrative on capital expenditures
Owens Corning	***
Plastpro	***
Therma-Tru	***

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

Table 6.7 Fiberglass door panels: U.S. producers' R&D expenses, by firm and period

Value in 1,000 dollars

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

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

Table 6.8 Fiberglass door panels: U.S. producers' narrative descriptions of their R&D expenses, by firm

Firm	Narrative on R&D expenses
Owens Corning	***
Plastpro	***
Therma-Tru	***

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

Assets and return on assets

Table 6.9 presents data on the U.S. producers' total assets while table 6.10 presents their operating ROA.¹⁴ Table 6.11 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time. For assets in the industry, there was *** of *** percent from 2022 to 2024.

Table 6.9 Fiberglass door panels: U.S. producers' total net assets, by firm and period

Value in 1,000 dollars

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

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

¹⁴ The operating ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value on a product-specific basis.

Table 6.10 Fiberglass door panels: U.S. producers' ROA, by firm and period

Ratio in percent

Firm	2022	2023	2024
Owens Corning	***	***	***
Plastpro	***	***	***
Therma-Tru	***	***	***
All firms	***	***	***

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

Table 6.11 Fiberglass door panels: U.S. producers' narrative descriptions of their total net assets, by firm

Firm	Narrative on assets
Owens Corning	***
Plastpro	***
Therma-Tru	***

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

Capital and investment

The Commission requested U.S. producers of fiberglass door panels to describe any actual or potential negative effects of imports of fiberglass door panels from China on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table 6.12 presents the number of firms reporting an impact in each category and table 6.13 provides the U.S. producers' narrative responses.

Table 6.12 Fiberglass door panels: Count of firms indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2022, 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 6.13 Fiberglass door panels: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2022, by firm and effect

Item	Firm name and narrative on impact of imports
Cancellation, postponement, or rejection of expansion projects	***
Reduction in the size of capital investments	***
Reduction in the size of capital investments	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Other negative effects on investments	***
Other effects on growth and development	***
Other effects on growth and development	***

Table continued.

Table 6.13 (Continued) Fiberglass door panels: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2022, by firm and effect

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

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

Part 7: Threat considerations and information on nonsubject countries

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

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

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

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

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

Information on the nature of the alleged subsidies was presented earlier in this report; information on the volume and pricing of imports of the subject merchandise is presented in Parts 4 and 5; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in Part 6. Information on inventories of the subject merchandise; foreign producers' operations, including the potential for "product-shifting;" any other threat indicators, if applicable; and any dumping in third-country markets, follows. Also presented in this section of the report is information obtained for consideration by the Commission on nonsubject countries.

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

The industry in China

The Commission issued foreign producers' or exporters' questionnaires to 46 firms believed to produce and/or export fiberglass door panels from China.³ Usable responses to the Commission's questionnaire were received from three firms: Dalian Capstone, Fangda Tech, and Wuxi Lutong Fiberglass Door Co., Ltd. ("Wuxi Lutong").

Table 7.1 presents the number of producers/exporters in China that responded to the Commission's questionnaire, their exports to the United States as a share of U.S. imports from China in 2024, and their estimated share of total production of fiberglass door panels in China during 2024.

Table 7.1 Fiberglass door panels: Number of responding producers/exporters, approximate share of production, and exports to the United States as a share of U.S. imports from China, 2024

Subject foreign industry	Number of responding firms	Approximate share of production (percent)	Exports as a share of U.S. imports from subject country (percent)
China	3	***	***

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

Note: "Approximate share of production" reflects the responding firms' estimates of their production as a share of total Chinese production of fiberglass door panels in 2024. Since not all firms have perfect knowledge of the industry in their home market, different firms might use different denominators in estimating their firm's share of the total requested. Since more than one firm responded, the average denominator for reasonably reported estimates is used in the share presented.

Note: "Exports as a share of U.S. imports" reflects a comparison of export data reported by firms in response to the Commission's foreign producer/exporter questionnaire with import data submitted in response to the Commission's importer questionnaire.

³ These firms were identified through a review of information submitted in the petitions and presented in third-party sources.

Table 7.2 presents information on the fiberglass door panels operations of the responding producers/exporters in China.

Table 7.2 Fiberglass door panels: Summary data for producers in China in 2024

Quantity in units; share in percent

Producer	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)
Dalian Capstone	***	***	***	***	***	***
Fangda Tech	***	***	***	***	***	***
Wuxi Lutong	***	***	***	***	***	***
All individual producers	***	100.0	***	100.0	***	***

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

Table 7.3 presents events in the industry in China since January 1, 2022.

Table 7.3 Fiberglass door panels: Important industry events in China since 2022

Item	Firm	Event
Expansions	Fangda Tech	Fangda Tech stated that it expanded its fiberglass door production in China in 2024 for the fourth time.

Source: Jiangxi Fangda Tech Co., Ltd., "About Us," retrieved April 7, 2025, <https://fangdadoors.com/pages/about-us>.

Changes in operations

Producers in China were asked to report any change in the character of their operations or organization relating to the production of fiberglass door panels since 2022. Two of three producers indicated in their questionnaires that they had experienced such changes. Table 7.4 presents the changes identified by these producers.

Table 7.4 Fiberglass door panels: Reported changes in operations in China since January 1, 2022, by firm

Item	Firm name and accompanying narrative response regarding changes in operations
Plant openings	***
Expansions	***

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

Installed and practical overall capacity

Table 7.5 presents data on producers' installed capacity, practical overall capacity, and practical fiberglass door panels capacity and production on the same equipment in China. Chinese producers' installed overall capacity increased by *** percent from 2022 to 2023, then increased by *** percent from 2023 to 2024, for an overall increase of *** percent between 2022 and 2024. Following a similar trend, practical overall capacity increased by *** percent from 2022 to 2023, then increased by *** percent from 2023 to 2024, increasing overall by *** percent during 2022 to 2024.

Chinese producers' installed overall capacity utilization increased by *** percentage points from 2022 to 2023, then decreased by *** percentage points from 2023 to 2024, ending *** percentage points lower in 2024 compared to 2022. Practical overall capacity utilization decreased by *** percentage points from 2022 to 2023, then decreased by *** percentage points from 2023 to 2024, decreasing overall by *** percentage points between 2022 and 2024.⁴

Table 7.5 Fiberglass door panels: Producers' installed and practical capacity and production on the same equipment as in-scope production in China, by period

Capacity and production in units; utilization in percent

Item	Measure	2022	2023	2024
Installed overall	Capacity	***	***	***
Installed overall	Production	***	***	***
Installed overall	Utilization	***	***	***
Practical overall	Capacity	***	***	***
Practical overall	Production	***	***	***
Practical overall	Utilization	***	***	***
Practical Fiberglass door panels	Capacity	***	***	***
Practical Fiberglass door panels	Production	***	***	***
Practical Fiberglass door panels	Utilization	***	***	***

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

⁴ Overall declines in Chinese producers' installed overall capacity utilization and practical overall capacity utilization are due to ***. ***'s installed overall capacity utilization fell from *** percent in 2022 to *** percent in 2024 and practical overall capacity utilization fell from *** percent in 2022 to *** percent in 2024.

Constraints on capacity

Table 7.6 presents producers' reported capacity constraints in China since January 1, 2022.

Table 7.6 Fiberglass door panels: Producers' reported constraints to practical overall capacity in China since January 1, 2022, by constraint and firm

Type of constraint	Firm name, and narrative response on constraints to practical overall capacity
Production bottlenecks	***
Existing labor force	***
Existing labor force	***

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

Operations on fiberglass door panels

Table 7.7 presents information on the fiberglass door panels operations of the responding producers and exporters in China. Chinese production of fiberglass door panels increased by *** percent during 2022 to 2023, then increased by *** percent during 2023 to 2024, for an overall *** percent increase from 2022 to 2024. Chinese producers' capacity utilization was high and relatively stable over the period for which data were collected, decreasing from *** percent in 2022 to *** in 2023 then increasing to *** percent in 2024. Capacity, production, and capacity utilization are all projected to be lower in 2025 and 2026 compared to 2024.⁵

The Chinese industry is export-oriented, with *** reported shipments of fiberglass door panels destined for export markets.⁶ More than *** of Chinese producers' total shipments were exported to the United States in each year during 2022 to 2024. Chinese producers' exports to the United States increased by *** percent during 2022 to 2023, then increased by *** percent during 2023 to 2024, increasing overall by *** percent from 2022 to 2024. Exports to all other markets followed a similar trend, increasing by *** percent from 2022 to 2023, then increasing by *** percent from 2023 to 2024, for an overall *** percent increase between 2022 and 2024. All other export markets accounted

⁵ Projected decreases for 2025 and 2026 largely reflect data reported by ***, the largest Chinese producer in 2023 and 2024, which cited potential tariffs as the basis for its projections. *** projects its capacity will decrease from *** units in 2024 to *** units in 2025 and 2026 and its production will decrease from *** units in 2024 to *** units in 2025 and 2026.

⁶ Home market shipments accounted for *** percent of Chinese producers' total shipments in each year between 2022 and 2024. Home market shipments are projected to decrease to *** in 2025 and 2026. Parties note that there is limited use of fiberglass door panels in the Chinese market as much of the residential market is high rises with different specifications and requirements. Conference transcript, pp. 128 (An) and 194 (So).

for *** to *** percent of Chinese producers' total shipments from 2022 to 2024.⁷ Exports to the United States are projected to be lower in 2025 and 2026 compared to 2024, while exports to all other markets are projected to be higher.⁸

Table 7.7 Fiberglass door panels: Data on industry in China, by period

Quantity in units

Item	2022	2023	2024	Projection 2025	Projection 2026
Capacity	***	***	***	***	***
Production	***	***	***	***	***
Beginning inventories	***	***	***	***	***
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	***	***	***	***	***

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

Table 7.7 Continued Fiberglass door panels: Data on industry in China, by period

Shares and ratios in percent

Item	2022	2023	2024	Projection 2025	Projection 2026
Capacity utilization ratio	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***
Internal consumption share	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***
Home market shipments share	***	***	***	***	***
Exports to the United States share	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***
Export shipments share	***	***	***	***	***
Total shipments share	100.0	100.0	100.0	100.0	100.0

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

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

⁷ Other export markets identified by Chinese producers include ***.

⁸ ***, projects that its exports to the United States will decrease from *** units in 2024 to *** units in 2025 and 2026. Comparatively, *** projects slightly lower exports, and *** projects increased exports in each year over the same projected period.

Alternative products

As shown in table 7.8, Chinese firms reported producing other products on the same equipment and machinery used to produce fiberglass door panels. The share of Chinese producers' overall production accounted for by out-of-scope products fell by *** percentage points from 2022 to 2024, reflecting the larger increase in production of fiberglass door panels over this period compared to the increase in production of out-of-scope products. Virtually all production of out-of-scope products was reported by ***; such products that it produced include PVC door frame components, PVC components, and other fiberglass components. Additionally, *** reported production of glass frames and skins.

Table 7.8 Fiberglass door panels: Producers' overall production on the same equipment as in-scope production in China, by period

Quantity in units; ratio and share in percent

Product type	Measure	2022	2023	2024
Fiberglass door panels	Quantity	***	***	***
Medium density fiberboard door panels	Quantity	***	***	***
Wood door panels	Quantity	***	***	***
Steel door panels	Quantity	***	***	***
Other products	Quantity	***	***	***
Out-of-scope products	Quantity	***	***	***
All products	Quantity	***	***	***
Fiberglass door panels	Share	***	***	***
Medium density fiberboard door panels	Share	***	***	***
Wood door panels	Share	***	***	***
Steel door panels	Share	***	***	***
Other products	Share	***	***	***
Out-of-scope products	Share	***	***	***
All products	Share	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”. Quantities denoted as “other products” were described by foreign producers as including “glass frame and skins” and “PVC door frame components: i.e. jambs, headers, brickmolds, mullions, mullion caps); PVC components: rails, stiles, SDLs; Other fiberglass components: dentil shelves; swatch”.

Exports

According to GTA, the leading export markets for doors, windows and their frames and thresholds for doors, of plastics (a category that includes fiberglass door panels and out-of-scope products) from China are the United States, Saudi Arabia, and Israel (table 7.9). During 2024, the United States was the top destination market for such exports from China, accounting for 39.0 percent of exports by value, followed by Saudi Arabia (11.0 percent) and Israel (8.8 percent).

Table 7.9 Doors, windows and their frames and thresholds for doors, of plastics: Exports from China, by destination market and period

Value in 1,000 dollars; share in percent

Destination market	Measure	2022	2023	2024
United States	Value	152,762	159,011	221,609
Saudi Arabia	Value	35,230	45,147	62,404
Israel	Value	53,911	48,827	50,080
Thailand	Value	27,674	22,758	22,596
Indonesia	Value	11,459	17,153	18,686
United Kingdom	Value	10,645	14,247	17,639
Canada	Value	11,691	10,309	15,028
Australia	Value	14,192	12,828	10,376
United Arab Emirates	Value	4,067	7,025	9,195
All other destination markets	Value	129,991	119,103	140,186
Non-U.S. destination markets	Value	298,860	297,398	346,191
All destination markets	Value	451,622	456,409	567,799
United States	Share of value	33.8	34.8	39.0
Saudi Arabia	Share of value	7.8	9.9	11.0
Israel	Share of value	11.9	10.7	8.8
Thailand	Share of value	6.1	5.0	4.0
Indonesia	Share of value	2.5	3.8	3.3
United Kingdom	Share of value	2.4	3.1	3.1
Canada	Share of value	2.6	2.3	2.6
Australia	Share of value	3.1	2.8	1.8
United Arab Emirates	Share of value	0.9	1.5	1.6
All other destination markets	Share of value	28.8	26.1	24.7
Non-U.S. destination markets	Share of value	66.2	65.2	61.0
All destination markets	Share of value	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 3925.20 as reported by China customs in the Global Trade Atlas Suite database, accessed April 3, 2025.

Note: United States is shown at the top. All remaining top export destinations are shown in descending order of 2024 data.

U.S. inventories of imported merchandise

Table 7.10 presents data on U.S. importers' reported inventories of fiberglass door panels. Inventories of imports from China increased by *** percent from 2022 to 2023, then increased by 52.0 percent from 2023 to 2024, for an overall *** percent increase between 2022 and 2024. Comparatively, inventories of imports from nonsubject sources decreased by *** percent from 2022 to 2023, then increased by 105.0 percent from 2023 to 2024, decreasing overall by *** percent during 2022 to 2024.

Table 7.10 Fiberglass door panels: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in units; ratio in percent

Measure	Source	2022	2023	2024
Inventories quantity	China	***	180,734	274,753
Ratio to imports	China	***	29.9	32.3
Ratio to U.S. shipments of imports	China	***	34.5	36.3
Ratio to total Shipments of imports	China	***	34.5	36.3
Inventories quantity	Nonsubject sources	***	36,135	74,064
Ratio to imports	Nonsubject sources	***	13.0	13.5
Ratio to U.S. shipments of imports	Nonsubject sources	***	10.8	14.4
Ratio to total Shipments of imports	Nonsubject sources	***	10.8	14.4
Inventories quantity	All import sources	192,866	216,869	348,817
Ratio to imports	All import sources	14.6	24.6	24.9
Ratio to U.S. shipments of imports	All import sources	15.2	25.3	27.5
Ratio to total Shipments of imports	All import sources	15.2	25.3	27.5

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

U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of fiberglass door panels from China and all other sources after December 31, 2024. Their reported data are presented in table 7.11. Of the 25 responding importers, 17 firms reported arranged imports of fiberglass door panels from China and six firms reported arranged imports of fiberglass door panels from nonsubject sources. Imports from China represent *** percent of U.S. importers' total arranged imports.

Table 7.11 Fiberglass door panels: U.S. importers' arranged imports, by source and period

Quantity in units

Source	Q1 2025	Q2 2025	Q3 2025	Q4 2025	Total
China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

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

Third-country trade actions

There are no known trade remedy actions on fiberglass door panels or fiberglass sidelites in third-country markets.

Information on nonsubject countries

Table 7.12 presents global export data for fiberglass door panels and fiberglass sidelites, as well as other builders' ware of plastic (e.g., door thresholds, windows, and window frames) that is out of scope. The largest global exporter was Poland, representing 40.5 percent of global exports by value in 2024, with exports of more than \$2.2 billion. The next four leading nonsubject exporters, which accounted for a combined 20.6 percent of global export value in 2024, were Romania, Germany, Turkey, and Canada. Exports from nonsubject countries, combined, represented 86.9 percent of total global export values in 2024.

Table 7.12 Doors, windows and their frames and thresholds for doors, of plastics: Global exports, by exporter and period

Value in 1,000 dollars; share in percent

Exporting country	Measure	2022	2023	2024
United States	Value	157,467	148,119	142,879
China	Value	451,622	456,409	567,799
Poland	Value	2,184,387	2,228,126	2,201,001
Romania	Value	438,708	460,948	390,834
Germany	Value	412,132	396,036	352,319
Turkey	Value	212,711	205,945	194,791
Canada	Value	186,315	176,169	179,707
Austria	Value	176,051	191,503	157,764
Slovakia	Value	167,822	142,916	127,307
Czech Republic	Value	144,611	115,068	96,050
Lithuania	Value	68,826	68,331	90,881
All other exporters	Value	1,123,543	1,126,309	933,292
All reporting exporters	Value	5,724,195	5,715,879	5,434,625
United States	Share of Value	2.8	2.6	2.6
China	Share of Value	7.9	8.0	10.4
Poland	Share of Value	38.2	39.0	40.5
Romania	Share of Value	7.7	8.1	7.2
Germany	Share of Value	7.2	6.9	6.5
Turkey	Share of Value	3.7	3.6	3.6
Canada	Share of Value	3.3	3.1	3.3
Austria	Share of Value	3.1	3.4	2.9
Slovakia	Share of Value	2.9	2.5	2.3
Czech Republic	Share of Value	2.5	2.0	1.8
Lithuania	Share of Value	1.2	1.2	1.7
All other exporters	Share of Value	19.6	19.7	17.2
All reporting exporters	Share of Value	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 3925.20 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed April 3, 2025.

Note: United States is shown at the top followed by the country under investigation, all remaining top exporting countries in descending order of 2024 data.

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
90 FR 13778, March 26, 2025	Fiberglass Door Panels From China; Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations	https://www.govinfo.gov/cont ent/pkg/FR-2025-03-26/pdf/2025-05143.pdf
90 FR 15684, April 15, 2025	Fiberglass Door Panels From the People's Republic of China: Initiation of Less-Than-Fair-Value Investigation	https://www.govinfo.gov/cont ent/pkg/FR-2025-04-15/pdf/2025-06383.pdf
90 FR 15692, April 15, 2025	Fiberglass Door Panels From the People's Republic of China: Initiation of Countervailing Duty Investigation	https://www.govinfo.gov/cont ent/pkg/FR-2025-04-15/pdf/2025-06384.pdf

APPENDIX B

LIST OF STAFF CONFERENCE WITNESSES

CALENDAR OF PUBLIC PRELIMINARY CONFERENCE

Those listed below appeared as witnesses at the United States International Trade Commission's preliminary conference:

Subject: Fiberglass Door Panels from China
Inv. Nos.: 701-TA-758 and 731-TA-1739 (Preliminary)
Date and Time: April 10, 2025 – 9:30 a.m.

Sessions were held in connection with these preliminary phase investigations **all virtually** via Webex.

OPENING REMARKS:

In Support of Imposition (**Derick G. Holt**, Wiley Rein LLP)

In Opposition to Imposition (**Matthew R. Nicely**, Akin Gump Strauss Hauer & Feld LLP)

In Support of the Imposition of the Antidumping and Countervailing Duty Orders:

Wiley Rein LLP
Washington, DC
on behalf of

American Fiberglass Door Coalition

Eric Dotson, General Manager, Therma-Tru Corporation

Kevin Fein, General Manager and Vice President of Sales, Therma-Tru Corporation

Brian Slade, Associate General Counsel, Commercial, Fortune Brands Innovations, Inc.

Tom Jaskiewicz, Vice President of Sales, for the Americas, Owens Corning Doors

Bradley Link, General Counsel, Doors, Owens Corning Doors

Steve Swartzmiller, Vice President R&D and Advanced Technology, Owens Corning Doors

Franco An, President, Plastpro 2000 Inc.

**In Support of the Imposition of the
Antidumping and Countervailing Duty Orders (continued):**

Michael Tull, Owner, Tull Sales

Seth Kaplan, President, International Economic Research LLC

Timothy C. Brightbill)
Robert E. DeFrancesco, III) – OF COUNSEL
Derick G. Holt)

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

Akin Gump Strauss Hauer & Feld LLP
Washington, DC
on behalf of

Trinity Glass International Inc.

Chong S. So, President, Trinity Glass International, Inc.

George Nonemaker, Vice President, Sales, Trinity Glass International, Inc.

Matthew R. Nicely)
) – OF COUNSEL
Julia K. Eppard)

REBUTTAL/CLOSING REMARKS:

In Support of Imposition (**Robert E. DeFrancesco**, Wiley Rein LLP)

In Opposition to Imposition (**Julia K. Eppard**, Akin Gump Strauss Hauer & Feld LLP)

APPENDIX C

SUMMARY DATA

Table C-1: Fiberglass door panels: Summary data concerning the U.S. total market	C.3
Table C-2: Fiberglass door panels: Summary data concerning the U.S. merchant market.....	C.5

Total Market

Table C.1

Fiberglass door panels: Summary data concerning the U.S. total 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 change comparisons		
	2022	2023	2024	2022–24	2022–23	2023–24
U.S. total market consumption quantity:						
Amount.....	***	***	***	▼***	▼***	▲***
Producers' share (fn1).....	***	***	***	▼***	▲***	▼***
Importers' share (fn1):						
China.....	***	***	***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	▼***	▼***	▲***
All import sources.....	***	***	***	▲***	▼***	▲***
U.S. total market consumption value:						
Amount.....	***	***	***	▼***	▼***	▲***
Producers' share (fn1).....	***	***	***	▼***	▲***	▼***
Importers' share (fn1):						
China.....	***	***	***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	▼***	▼***	▲***
All import sources.....	***	***	***	▲***	▼***	▲***
U.S. importers' U.S. shipments of imports from.--						
China:						
Quantity.....	649,571	523,508	757,214	▲16.6	▼(19.4)	▲44.6
Value.....	130,385	112,658	148,637	▲14.0	▼(13.6)	▲31.9
Unit value.....	\$201	\$215	\$196	▼(2.2)	▲7.2	▼(8.8)
Ending inventory quantity.....	***	180,734	274,753	▲***	▲***	▲52.0
Nonsubject sources:						
Quantity.....	622,258	333,846	512,683	▼(17.6)	▼(46.3)	▲53.6
Value.....	107,338	62,323	95,553	▼(11.0)	▼(41.9)	▲53.3
Unit value.....	\$172	\$187	\$186	▲8.0	▲8.2	▼(0.2)
Ending inventory quantity.....	***	36,135	74,064	▼***	▼***	▲105.0
All import sources:						
Quantity.....	1,271,829	857,354	1,269,897	▼(0.2)	▼(32.6)	▲48.1
Value.....	237,723	174,981	244,190	▲2.7	▼(26.4)	▲39.6
Unit value.....	\$187	\$204	\$192	▲2.9	▲9.2	▼(5.8)
Ending inventory quantity.....	192,866	216,869	348,817	▲80.9	▲12.4	▲60.8
U.S. producers':						
Practical capacity quantity.....	***	***	***	▲***	▲***	***
Production quantity.....	***	***	***	▼***	▼***	▲***
Capacity utilization (fn1).....	***	***	***	▼***	▼***	▲***
U.S. shipments:						
Quantity.....	***	***	***	▼***	▼***	▲***
Value.....	***	***	***	▼***	▼***	▲***
Unit value.....	***	***	***	▲***	▲***	▼***

Table continued.

Table C.1 Continued

Fiberglass door panels: Summary data concerning the U.S. total 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 change comparisons		
	Calendar year			Calendar year		
	2022	2023	2024	2022–24	2022–23	2023–24
U.S. producers'--Continued						
Export shipments:						
Quantity.....	***	***	***	▼***	▼***	▼***
Value.....	***	***	***	▼***	▼***	▼***
Unit value.....	***	***	***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	▼***	▼***	▲***
Inventories/total shipments (fn1).....	***	***	***	▲***	▲***	▼***
Production workers.....	***	***	***	▼***	▼***	▲***
Hours worked (1,000s).....	***	***	***	▼***	▼***	▼***
Wages paid (\$1,000).....	***	***	***	▼***	▼***	▼***
Hourly wages (dollars per hour).....	***	***	***	▲***	▲***	▲***
Productivity (units per 1,000 hours).....	***	***	***	▲***	▼***	▲***
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. 508-compliant tables for these data are contained in parts 3, 4, 6, and 7 of this report.

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.

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.

Merchant Market

Table C.2

Fiberglass door panels: Summary data concerning the U.S. merchant 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 change comparisons		
	2022	2023	2024	2022-24	2022-23	2023-24
U.S. merchant market consumption quantity:						
Amount.....	***	***	***	▼***	▼***	▲***
Producers' share (fn1).....	***	***	***	▼***	▲***	▼***
Importers' share (fn1):						
China.....	***	***	***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	▼***	▼***	▲***
All import sources.....	***	***	***	▲***	▼***	▲***
U.S. merchant market consumption value:						
Amount.....	***	***	***	▼***	▼***	▲***
Producers' share (fn1).....	***	***	***	▼***	▲***	▼***
Importers' share (fn1):						
China.....	***	***	***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	▼***	▼***	▲***
All import sources.....	***	***	***	▲***	▼***	▲***
U.S. importers' U.S. shipments of imports from.--						
China:						
Quantity.....	649,571	523,508	757,214	▲16.6	▼(19.4)	▲44.6
Value.....	130,385	112,658	148,637	▲14.0	▼(13.6)	▲31.9
Unit value.....	\$201	\$215	\$196	▼(2.2)	▲7.2	▼(8.8)
Ending inventory quantity.....	***	180,734	274,753	▲***	▲***	▲52.0
Nonsubject sources:						
Quantity.....	622,258	333,846	512,683	▼(17.6)	▼(46.3)	▲53.6
Value.....	107,338	62,323	95,553	▼(11.0)	▼(41.9)	▲53.3
Unit value.....	\$172	\$187	\$186	▲8.0	▲8.2	▼(0.2)
Ending inventory quantity.....	***	36,135	74,064	▼***	▼***	▲105.0
All import sources:						
Quantity.....	1,271,829	857,354	1,269,897	▼(0.2)	▼(32.6)	▲48.1
Value.....	237,723	174,981	244,190	▲2.7	▼(26.4)	▲39.6
Unit value.....	\$187	\$204	\$192	▲2.9	▲9.2	▼(5.8)
Ending inventory quantity.....	192,866	216,869	348,817	▲80.9	▲12.4	▲60.8
U.S. producers':						
Commercial U.S. shipments						
Quantity.....	***	***	***	▼***	▼***	▲***
Value.....	***	***	***	▼***	▼***	▲***
Unit value.....	***	***	***	▲***	▲***	▼***

Table continued.

Table C.2 Continued

Fiberglass door panels: Summary data concerning the U.S. merchant 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 change comparisons		
	Calendar year			Calendar year		
	2022	2023	2024	2022–24	2022–23	2023–24
U.S. producers':--Continued						
Commercial 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).....	***	***	***	▼***	▲***	▼***

Source: Compiled from data submitted in response to Commission questionnaires. 508-compliant tables for these data are contained in parts 3, 4, 6, 7 and appendix E of this report.

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.

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.

APPENDIX D

FIRMS' RESPONSES REGARDING DOMESTIC LIKE PRODUCT FACTORS

Table D.1 Fiberglass door panels: U.S. producers' narratives comparing fiberglass door panels and medium density fiberboard door panels, by domestic like product factor

Factor	Producer name and narrative response on comparability
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Channels	***
Channels	***
Channels	***
Manufacturing	***
Manufacturing	***

Factor	Producer name and narrative response on comparability
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Price	***
Price	***
Price	***
Price	***

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

Table D.2 Fiberglass door panels: U.S. importers' narratives comparing fiberglass door panels and medium density fiberboard door panels, by domestic like product factor

Factor	Importer name and narrative response on comparability
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***

Factor	Importer name and narrative response on comparability
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***

Factor	Importer name and narrative response on comparability
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***

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

Table D.3 Fiberglass door panels: U.S. producers' narratives comparing fiberglass door panels and wood door panels, by domestic like product factor

Factor	Producer name and narrative response on comparability
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Channels	***
Channels	***
Channels	***
Channels	***
Manufacturing	***

Factor	Producer name and narrative response on comparability
Manufacturing	***
Manufacturing	***
Manufacturing	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Price	***
Price	***
Price	***
Price	***

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

D.4 Fiberglass door panels: U.S. importers' narratives comparing fiberglass door panels and wood door panels, by domestic like product factor

Factor	Importer name and narrative response on comparability
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***

Factor	Importer name and narrative response on comparability
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***

Factor	Importer name and narrative response on comparability
Manufacturing	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***

Factor	Importer name and narrative response on comparability
Price	***
Price	***

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

D.5 Fiberglass door panels: U.S. producers' narratives comparing fiberglass door panels and steel door panels, by domestic like product factor

Factor	Producer name and narrative response on comparability
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Channels	***
Channels	***

Factor	Producer name and narrative response on comparability
Channels	***
Channels	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Price	***
Price	***
Price	***
Price	***

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

D.6 Fiberglass door panels: U.S. importers' narratives comparing fiberglass door panels and steel door panels, by domestic like product factor

Factor	Importer name and narrative response on comparability
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***

Factor	Importer name and narrative response on comparability
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Manufacturing	***
Manufacturing	***

Factor	Importer name and narrative response on comparability
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***

Factor	Importer name and narrative response on comparability
Perceptions	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***

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

APPENDIX E

MERCHANT MARKET DATA

Tables E.1 and E.2 and figures E.1 and E.2 present data for apparent U.S. merchant market consumption. Figure E.3 and tables E.3 and E.4 present financial data for U.S. producers' merchant market operations.¹

Table E.1 Fiberglass door panels: Apparent U.S. merchant market consumption and market shares based on quantity data, by source and period

Quantity in units; shares in percent

Source	Measure	2022	2023	2024
U.S. producers	Quantity	***	***	***
China	Quantity	649,571	523,508	757,214
Nonsubject sources	Quantity	622,258	333,846	512,683
All import sources	Quantity	1,271,829	857,354	1,269,897
All sources	Quantity	***	***	***
U.S. producers	Share	***	***	***
China	Share	***	***	***
Nonsubject sources	Share	***	***	***
All import sources	Share	***	***	***
All sources	Share	100.0	100.0	100.0

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

Figure E.1 Fiberglass door panels: Apparent U.S. merchant market consumption based on quantity data, by source and period

* * * * *

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

¹ Financial data do not include *** due to reporting issues discussed in Part 6.

Table E.2 Fiberglass door panels: Apparent U.S. merchant market consumption and market shares based on value data, by source and period

Value in 1,000 dollars; shares in percent

Source	Measure	2022	2023	2024
U.S. producers	Value	***	***	***
China	Value	130,385	112,658	148,637
Nonsubject sources	Value	107,338	62,323	95,553
All import sources	Value	237,723	174,981	244,190
All sources	Value	***	***	***
U.S. producers	Share	***	***	***
China	Share	***	***	***
Nonsubject sources	Share	***	***	***
All import sources	Share	***	***	***
All sources	Share	100.0	100.0	100.0

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

Figure E.2 Fiberglass door panels: Apparent U.S. merchant market consumption based on value data, by source and period

* * * * *

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

Figure E.3 Fiberglass door panels: U.S. producers' share of commercial sales quantity for the merchant market in 2024, by firm

* * * * *

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

Table E.3 Fiberglass door panels: U.S. producers' results of merchant market operations, by item and period

Quantity in units; value in 1,000 dollars; ratios in percent; CS are commercial sales

Item	Measure	2022	2023	2024
Commercial sales (CS)	Quantity	***	***	***
Commercial sales (CS)	Value	***	***	***
COGS: Raw materials	Value	***	***	***
COGS: Direct labor	Value	***	***	***
COGS: Other factory	Value	***	***	***
COGS: Total	Value	***	***	***
Gross profit or (loss)	Value	***	***	***
SG&A expenses	Value	***	***	***
Operating income or (loss)	Value	***	***	***
Other expense / (income), net	Value	***	***	***
Net income or (loss)	Value	***	***	***
Depreciation/amortization	Value	***	***	***
COGS: Raw materials	Ratio to CS	***	***	***
COGS: Direct labor	Ratio to CS	***	***	***
COGS: Other factory	Ratio to CS	***	***	***
COGS: Total	Ratio to CS	***	***	***
Gross profit	Ratio to CS	***	***	***
SG&A expense	Ratio to CS	***	***	***
Operating income or (loss)	Ratio to CS	***	***	***
Net income or (loss)	Ratio to CS	***	***	***

Table continued.

Table E.3 (Continued) Fiberglass door panels: U.S. producers' results of merchant market operations, by item and period

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

Item	Measure	2022	2023	2024
COGS: Raw materials	Share	***	***	***
COGS: Direct labor	Share	***	***	***
COGS: Other factory	Share	***	***	***
COGS: Total	Share	100.0	100.0	100.0
Commercial 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	3	3	3

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

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

Table E.4 Fiberglass door panels: Changes in merchant market AUVs between comparison periods

Changes in percent

Item	2022–24	2022–23	2023–24
Commercial sales	▲ ***	▲ ***	▼ ***
COGS: Raw materials	▼ ***	▼ ***	▲ ***
COGS: Direct labor	▲ ***	▲ ***	▲ ***
COGS: Other factory	▲ ***	▲ ***	▼ ***
COGS: Total	▲ ***	▼ ***	▲ ***

Table continued.

Table E.4 (Continued) Fiberglass door panels: Changes in merchant market AUVs between comparison periods

Changes in dollars per pound

Item	2022–24	2022–23	2023–24
Commercial 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: Percentages and unit values shown as “0.0” or “0.00” represent values greater than zero, but less than “0.05” or “0.005,” respectively. 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.

