Lattice-Boom Crawler Cranes (LBCCs) from Japan

Investigation No. 731-TA-1742 (Preliminary)

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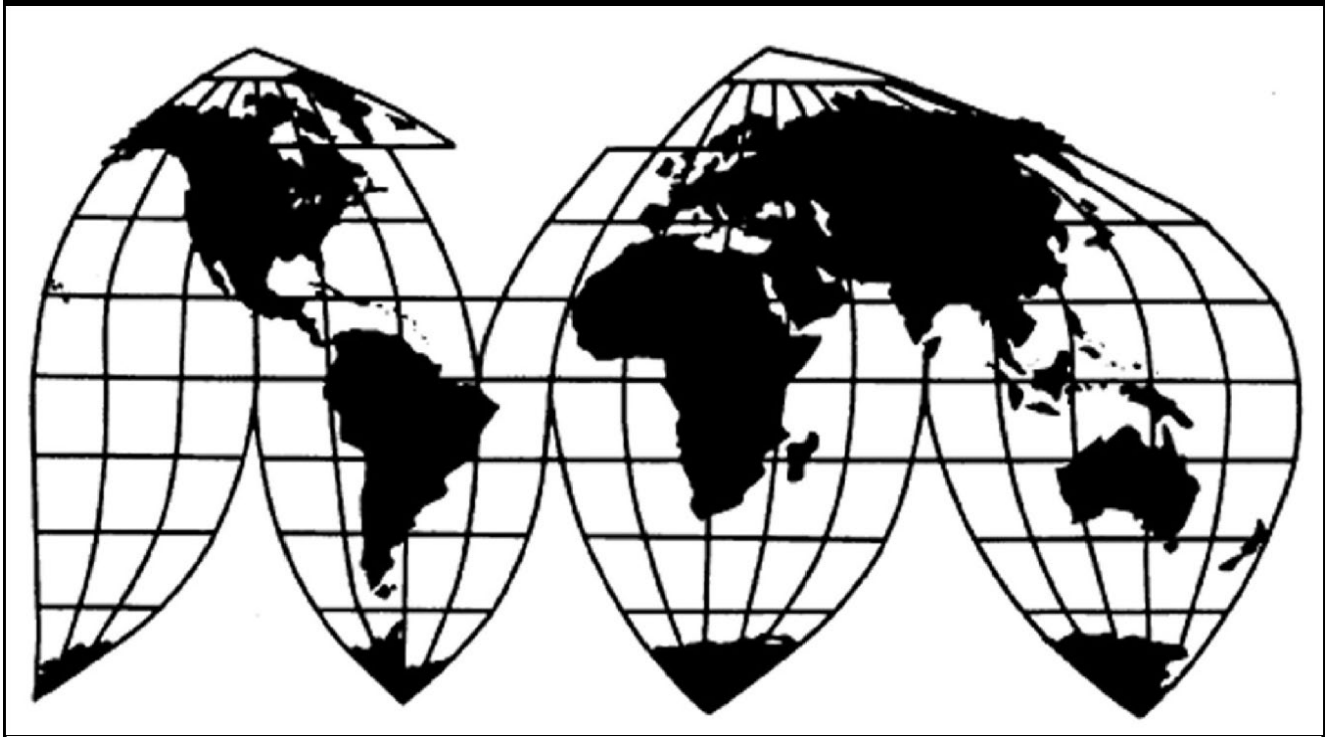
U.S. International Trade Commission



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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Note.—Information that would reveal confidential operations of individual firms may not be published.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 No. 731-TA-1742 (Preliminary)

Lattice-Boom Crawler Cranes (LBCCs) from Japan

DETERMINATION

On the basis of the record[1] developed in the subject investigation, 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 lattice-boom crawler cranes (LBCCs) from Japan, provided for in subheading 8426.49.00 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").[2]

COMMENCEMENT OF FINAL PHASE INVESTIGATION

Pursuant to section 207.18 of the Commission's rules, the Commission also gives notice of the commencement of the final phase of its investigation. The Commission will issue a final phase notice of scheduling, which will be published in the *Federal Register* as provided in section 207.21 of the Commission's rules, upon notice from the U.S. Department of Commerce ("Commerce") of an affirmative preliminary determination in the investigation under § 733(b) of the Act, or, if the preliminary determination is negative, upon notice of an affirmative final determination in that investigation under § 735(a) of the Act. Parties that filed entries of appearance in the preliminary phase of the investigation need not enter a separate appearance for the final phase of the investigation. Any other party may file an entry of appearance for the final phase of the investigation 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 investigation. The Secretary will prepare a public service list containing the names and addresses of all persons, or their representatives, who are parties to the investigation. As

[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 15989 (April 16, 2025).

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 investigation to parties to the investigation, placing copies on the Commission's Electronic Document Information System (EDIS, https://edis.usitc.gov), for comment.

BACKGROUND

On April 10, 2025, The Manitowoc Company, Inc., Milwaukee, WI filed a petition with the Commission and Commerce, alleging that an industry in the United States is materially injured or threatened with material injury by reason of LTFV imports of lattice-boom crawler cranes (LBCCs) from Japan. Accordingly, effective April 10, 2025, the Commission instituted antidumping duty investigation No. 731-TA-1742 (Preliminary).

Notice of the institution of the Commission's investigation 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 April 16, 2025 (90 FR 15989). The Commission conducted its conference on May 1, 2025. All persons who requested the opportunity were permitted to participate.

Views of the Commission

Based on the record in the preliminary phase of this investigation, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of lattice boom crawler cranes ("LBCC") from Japan that are allegedly sold in the United States at less than fair value ("LTFV").

I. The Legal Standard for Preliminary Determinations

The legal standard for preliminary antidumping 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

The petition in this investigation was filed on April 10, 2025, by The Manitowoc Company, Inc. ("Manitowoc" or "Petitioner"), a domestic producer of LBCCs.[3] Petitioner participated in the staff conference accompanied by counsel and submitted a postconference brief.[4]

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[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] *See* Petition for the Imposition of Antidumping Duties, EDIS Doc. 848346 (Apr. 10, 2025) ("Petition"); Confidential Staff Report, Memorandum INV-XX-064 (May 19, 2025) ("CR") at 1.1; Public Staff Report, *Lattice-Boom Crawler Cranes from Japan*, Inv. No. 731-TA-1742 (Preliminary), USITC Pub. 5634 (June 2025) ("PR") at 1.1.

[4] *See* Transcript of Preliminary Conference, EDIS Doc. 850632 (May 7, 2025) ("Conf. Tr.") at 3; Petitioner's Postconference Brief, EDIS Doc. 850548 (May 6, 2025) ("Pet. Postconference Br.").

Several respondent entities participated in this investigation. Link-Belt Cranes, L.P., LLLP ("Link-Belt"), a U.S. importer and domestic processor of LBCCs, and an affiliated Japanese producer, Sumitomo Heavy Industries Construction Cranes Co., Ltd. ("Sumitomo"),[5] appeared at the conference accompanied by counsel and submitted a joint postconference brief.[6] Kobelco Construction Machinery Co., Ltd. ("KCM"), a Japanese producer, and Kobelco Construction Machinery U.S.A., Inc., a U.S. importer of LBCCs from Japan (collectively, "Kobelco"), also appeared at the conference accompanied by counsel and submitted a postconference brief.[7]

U.S. industry data are based on the questionnaire responses of one firm that accounted for all known U.S. production of LBCCs during 2024.[8] U.S. imports are based on the questionnaire responses of three firms that accounted for all subject imports from Japan in 2024 and *** units of nonsubject imports, as well as estimated nonsubject import figures provided by the Petitioner that indicate a low coverage of nonsubject imports in the questionnaire responses.[9] The Commission received responses to its questionnaires from two producer/exporters of LBCCs in Japan, accounting for approximately *** percent of production of subject merchandise in Japan in 2024.[10]

III. Domestic Like Product

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

[5] When referring to their brief and the arguments made therein, we refer to Link-Belt and Sumitomo collectively as "Link-Belt."

[6] Link-Belt Postconference Brief, EDIS Doc. 850564 (May 6, 2025) ("Link-Belt Postconference Br."); Conf. Tr. at 4.

[7] Kobelco Postconference Brief, EDIS Doc. 850550 (May 6, 2025) ("Kobelco Postconference Br."); Conf. Tr. at 4.

[8] CR/PR at 3.1. The Commission also received a domestic producer questionnaire response from Link-Belt, who accounted for all known U.S. processing of LBCCs in 2024. *Id*. Thus, of these two firms, one is a domestic producer of LBCCs (Manitowoc) and one is a U.S. importer and processor of LBCCs (Link-Belt).

[9] CR/PR at 4.1, Tables 4.2 note, 4.4; Pet. Postconference Br. at 27. The quantity of subject imports includes data from Link-Belt, which imported *** units from Japan in 2024. CR/PR at 4.2 n.4.

[10] CR/PR at 7.1.

"industry."[11] 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."[12] 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."[13]

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. Department of Commerce ("Commerce").[14] 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."[15] The Commission then defines the domestic like product in light of the imported articles Commerce has identified.[16] 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.[17] No single factor is

[11] 19 U.S.C. § 1677(4)(A).

[12] 19 U.S.C. § 1677(4)(A).

[13] 19 U.S.C. § 1677(10).

[14] 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 F. 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).

[15] *Cleo Inc. v. United States*, 501 F.3d 1291, 1298 (Fed. Cir. 2007); *see also Hitachi Metals, Ltd. v. United States*, 949 F.3d 710, 717 (Fed. Cir. 2020) (the statute requires the Commission to start with Commerce's subject merchandise in reaching its own like product determination).

[16] *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).

[17] *See, e.g.*, *Cleo*, 501 F.3d at 1299; *NEC Corp. v. Dep't of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int'l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *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 (Continued…)

dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.[18] The Commission looks for clear dividing lines among possible like products and disregards minor variations.[19] The Commission may, where appropriate, include domestic articles in the domestic like product in addition to those described in the scope.[20]

A. Scope Definition

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

> The merchandise covered by this investigation consists of lattice boom crawler cranes, and lattice boom crawler crane assemblies. Lattice boom crawler cranes combine the assemblies defined below, among other components, including a lower carriage assembly fitted with tank-link crawler tracks, an upper carriage housing the operator cab, engine, and hydraulics, and a boom made of steel pipe welded together in a distinctive lattice pattern. The scope of this investigation covers lattice boom crawler cranes and lattice boom crawler crane assemblies, whether assembled or unassembled, and whether or not the lattice boom crawler crane contains any additional features that provide for functions beyond

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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).

[18] *See*, *e.g.*, S. Rep. No. 96-249 at 90–91 (1979).

[19] *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.").

[20] *See*, *e.g.*, *Pure Magnesium from China and Israel*, Inv. Nos. 701-TA-403 & 731-TA-895–896 (Final), USITC Pub. 3467 (Nov. 2001) at 8 n.34; *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).

the primary lifting function. All lattice boom crawler cranes are included in the scope regardless of maximum lift capacity, lattice boom length, jib configuration, or other added features.

Subject merchandise includes, but is not limited to, the following lattice boom crawler crane assemblies which can be imported in isolation or combined in different configurations at the time of import:

- Lattice boom assemblies and pieces thereof. Lattice boom assemblies are formed of interlocking sections of welded high-strength steel pipe, that form the lifting attachment of the crane. A lattice boom is formed by welding main chords together with lacing pipes typically arranged in a "W" or "V" pattern. Lattice boom assemblies consist of a boom butt (also known as a boom bottom or boom base), which attaches to the upper carriage assembly, and a boom head (also known as a boom tip or boom hat), which forms the other end of the boom structure. In between the boom butt and boom head, boom inserts of various lengths can be inserted to reach the desired boom height and load bearing capability. Lattice boom assemblies may be imported with boom butt, boom tip, and boom inserts together, but boom butt, boom tip, and boom inserts imported alone are also covered by the scope.

- Lower carriage assembly. The lower carriage assembly (also may be referred to as a carbody or lower works) is constructed with high-strength steel components and forms the base of the crawler crane. The lower carriage assembly typically includes various motors, drive mechanisms, and hydraulics. The lower carriage

assembly may also include a set of counterweights to provide backward stability for the assembled crane. The lower carriage typically has a circular center that is connected to the upper carriage assembly with a bearing. The lower and upper carriage assemblies may or may not be connected by a bearing at the time of importation. Steel arms extend from the center of the lower carriage and connect to the front and rear of the crawler assemblies that are positioned on both sides of the lower carriage assembly. The lower carriage assembly may also contain a hydraulic system that allows for the extension and retraction of the crawler assemblies to create a wider base. A lower carriage assembly may be imported with or without crawler assemblies.

- Crawler assembly. Each lattice boom crawler crane contains at least two crawler assemblies, which are continuous tracks that provide mobility and distribute the crane's weight evenly across the ground. The tracks of a lattice boom crawler crane consist of steel track shoes, which are interlocking steel plates that form the tread of the tracks and make direct contact with the ground, a track chain, which is a continuous loop of interconnected steel links, and a crawler body and track rollers, which support the track shoes and track chain. Typically, drive motors mounted on the lower carriage assembly connect to crawler-mounted drive sprockets, which engage the track chain and allow the LBCC to move forward and backward.

- Upper carriage assembly. The upper carriage assembly, also known as the upper works, typically includes the operator’s cab, hydraulic systems, engine, boom hoist, mast, and a turntable base

with swing drive mechanism that connects to the lower carriage assembly and allows the upper carriage to pivot on the lower carriage assembly. The upper and lower carriage assemblies may or may not be connected by a bearing at the time of importation. The upper carriage assembly may also include a separate counterweight tray and counterweights, which allow the crane to maintain balance while lifting heavy loads, as well as a gantry, which helps lift the boom and counterweights during installation, although the counterweight tray, counterweights, and gantry are not required to be attached for the upper carriage assembly to be a subject assembly. The boom butt may or may not be attached to the upper carriage assembly at the time of entry.

- Hoisting assembly. The hoisting assembly, housed within the upper carriage assembly and lattice boom assembly, powers the lifting and lowering of loads and typically consists of a hoisting line of high strength steel cable, a hoist motor, hoist brakes, hoisting drums, and a hook block formed from steel sheaves, which helps distribute the load on the hoisting line and increases lifting capacity. The main hoisting line typically runs from the hoist drums, housed in the upper carriage assembly, up through the lattice boom (which may or may not house additional hoist drums) and hook block.

- Jib assemblies. Jib assemblies are optional components that can be added to the top end of the boom to provide the crane with greater reach. Similar to lattice boom assemblies, jib assemblies typically consist of interlocking sections of welded steel pipe, arranged in a “V” or “W” lattice pattern. Jib assemblies can consist

of either fixed jib, which extends from the main lattice boom at a fixed angle, or a luffing jib, which can be raised or lowered by the operator through a separate set of controls.

Importation of any of these assemblies, whether assembled or unassembled, constitutes unfinished lattice boom crawler cranes for purposes of this investigation. Inclusion of other components not identified as comprising the finished or unfinished lattice boom crawler cranes and lattice boom crawler crane assemblies do not remove the products from the scope.

Processing of lattice boom crawler cranes and lattice boom crawler crane assemblies such as welding, joining, bolting, painting, coating, finishing, or assembly, either in the country of manufacture of the in-scope product or in a third country does not remove the product from the scope. Lattice boom crawler cranes and lattice boom crawler crane assemblies subject to this investigation include those that are produced in the subject country whether assembled with other components in the subject country or in a third country. Processing or completion of finished and unfinished lattice boom crawler cranes and the covered lattice boom crawler crane assemblies either in the subject country or in a third country does not remove the product from the scope.

Lattice boom crawler cranes and assemblies are classified in the Harmonized Tariff Schedule of the United States ("HTS") under statistical reporting numbers 8426.49.0010, 8426.49.0090, and 8431.49.1090. LBCCs imported from Japan enter the United States market at a column 1-general duty rate of 0 percent ad valorem. LBCC assemblies are imported under HTS statistical reporting numbers 8487.90.0080 and

> 8425.19.0000. LBCCs assemblies imported from Japan enter the United States market at a column 1-general duty rate of 3.9 percent ad valorem for HTS statistical reporting number 8487.90.0080 and 0 percent ad valorem for HTS statistical reporting number 8425.19.0000. Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.
>
> Certain steel components of LBCCs are subject to trade actions under section 232 of the Trade Expansion Act of 1962. As of February 10, 2025, HTS subheadings 8431.49.10 and 8431.49.90 are subject to 25 percent duties upon the value of steel content. [21]

LBCCs are gas-powered cranes used for lifting, lowering, and moving heavy loads at extended reach capacities.[22] LBCCs are primarily used in the construction and heavy-lifting industries for construction projects, including ports, bridges, and industrial buildings.[23] With lift capacities ranging from 70 tons to 2,300 tons, LBCCs are designed to lift varying weights of cargo at different heights.[24] If an LBCC is rented out, the life expectancy is 15 to 20 years, and if the LBCC is bought and maintained by an end user, the life expectancy is between 50 and 60 years.[25] A used LBCC can be refurbished and last for up to another 20 years.[26] Included within the scope are the six primary assemblies used to produce LBCCs, including the lattice boom assemblies, lower carriage assembly, crawler assembly, upper carriage assembly, hoisting assembly, and jib assembly.[27]

[21] CR/PR at 1.6-1.9; *see also Lattice Boom Crawler Cranes From Japan: Initiation of Less-Than-Fair-Value Investigation*, 90 Fed. Reg. 19270 (May 7, 2025).

[22] CR/PR at 1.10.

[23] CR/PR at 1.10.

[24] CR/PR at 1.10.

[25] CR/PR at 1.10.

[26] CR/PR at 1.10.

[27] CR/PR at 1.10.

The manufacturing process for LBCCs involves multiple steps at the manufacturing facility and the job site.[28] Since LBCCs can vary widely in terms of size and lift capacities, manufacturing timelines vary from product to product and range from 40 to 150 days.[29] High strength steel plates are laser cut to specific shapes, which are then joined together through laser welding or fastened with bolts to create the structure of various assemblies.[30] Additional components including electronics, hydraulics, and motors are then added to the assemblies.[31] The lattice boom and jib assemblies are welded from high strength structural steel pipe.[32] A manufacturer may produce all assemblies itself or, as in Link-Belt's case, import all assemblies but the lattice boom and jib.[33] Once the assemblies are completed (or imported), they are joined together to create the final LBCC, which is then sent off for inspection and testing.[34] LBCCs are often disassembled before shipment, which can require between 3 and 50 truckloads of parts and assemblies depending on the size of the LBCC, and then reassembled at the job site.[35]

B. Arguments of the Parties

Petitioner's Arguments. Petitioner argues that the Commission should apply its semifinished product analysis and define a single domestic like product, coextensive with the scope.[36] Petitioner contends that all LBCCs have the same physical characteristics and end uses; share the same production processes and manufacturing facilities using the same employees; are sold through the same channels of distribution; and are perceived as a single product category by producers and consumers.[37] Petitioner also contends that although prices of LBCCs may differ based on lifting capacity and the options a purchaser selects, LBCCs fall on a continuum of prices with considerable overlap.[38]

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[28] CR/PR at 1.14.
[29] CR/PR at 1.14.
[30] CR/PR at 1.14.
[31] CR/PR at 1.14.
[32] CR/PR at 1.14.
[33] Conference Trans. at 144-45 (Collins).
[34] CR/PR at 1.15.
[35] CR/PR at 1.15.
[36] Pet. Postconference Br. at 5-12.
[37] Pet. Postconference Br. at 5-12.
[38] Pet. Postconference Br. at 8.

Respondents' Arguments. Link-Belt contends that the Commission should apply its semifinished product analysis and find that LBCC assemblies should be defined as a separate domestic like product from finished LBCCs.[39] Link-Belt agrees that upstream assemblies are generally dedicated to the production of downstream LBCCs.[40] It argues, however, that assemblies and finished LBCCs operate in different markets, have different physical characteristics and functions, and differ in terms of costs and value. It also maintains that the manufacturing process used to convert assemblies into finished LBCCs is substantial.[41]

C. Analysis

We consider below whether in-scope assemblies should be included in the same domestic like product as finished LBCCs. Based on an analysis of the semifinished domestic like product factors, we define a single domestic like product consisting of all in-scope assemblies and LBCCs, coextensive with the scope of the investigation.[42]

Extent of Processes Used to Transform Downstream Product into Upstream Product. Manitowoc and one of three responding importers reported that the processes used to transform assemblies into finished LBCCs are not intensive, while Link-Belt, who is also an importer, and another responding importer reported that such processes are intensive.[43] Petitioner reported that the processes used to transform the assemblies into finished LBCCs ***.[44] Responding Japanese producer Kobelco also reported that ***.[45] On the other hand,

[39] Link-Belt Postconference Br. at 13-15.

[40] Link-Belt Postconference Br. at 14.

[41] Link-Belt Postconference Br. at 13-15.

[42] In a semifinished products analysis, the Commission examines the following: (1) the significance and extent of the processes used to transform the upstream into the downstream articles; (2) whether the upstream article is dedicated to the production of the downstream article or has independent uses; (3) differences in the physical characteristics and functions of the upstream and downstream articles; (4) whether there are perceived to be separate markets for the upstream and downstream articles; and (5) differences in the costs or value of the vertically differentiated articles. *See, e.g., Fluid End Blocks from China, Germany, India, and Italy*, Inv. Nos. 701-TA-632–635 and 731-TA-1466–1468 (Preliminary), USITC Pub. 5017 (Feb. 2020) at 10–12.

[43] CR/PR at Table 1.2.

[44] Manitowoc questionnaire response at VII-1.

[45] KCM questionnaire response at IV-1. Tadano America Corporation ("Tadano") did not answer this question. Tadano questionnaire response at IV-1.

Link-Belt indicated that because the LBCC assemblies ***.[46] Accordingly, Link-Belt reported that the process ***.[47]

Dedication for Use. All responding market participants reported that there are no uses for LBCC assemblies other than construction of an LBCC.[48]

Differences in Physical Characteristics and Functions of the Upstream and Downstream Articles. Manitowoc, Link-Belt, and two of three responding importers reported that there are differences in physical characteristics and functions between assemblies and finished LBCCs, while one responding importer reported that there are no differences.[49] Each of the six assemblies have distinctive physical characteristics that correspond to a different function when assembled into a finished LBCC. Nevertheless, all six assemblies contribute to the functionality of a finished LBCC and thus ultimately have the same end use as finished LBCCs, which is to lift and move heavy objects, generally on construction sites. Furthermore, because the assembly process does not significantly alter the physical characteristics of any individual assembly, the six assemblies and finished LBCCs share the same essential physical characteristics.

Separate Markets. All responding market participants reported that there are not separate markets for in-scope assemblies and finished LBCCs.[50]

Differences in Value. *** both reported that there are significant differences in the costs or value of individual LBCC assemblies and finished LBCCs.[51] Two of three importers stated that there are no significant differences.[52] When combined, however, LBCC assemblies constitute *** of the value of a finished LBCC.[53] Petitioner indicated that there are not

[46] Link-Belt questionnaire response at IV-1.

[47] Link-Belt questionnaire response at IV-1.

[48] CR/PR at 1.2; Link-Belt Postconference Br. at 14.

[49] CR/PR at Table 1.2.

[50] CR/PR at Table 1.2. Link-Belt, however, argues in its postconference brief that assemblies and finished LBCCs operate in separate markets because the assemblies are only bought by manufacturers of LBCCs while finished LBCCs can be bought or rented by various purchasers. Link-Belt Postconference Br. at 14.

[51] Manitowoc questionnaire response at VII-1; Link-Belt producer questionnaire response at VII-1.

[52] CR/PR at Table 1.2.

[53] CR/PR at Table 3.6; Manitowoc questionnaire response at VII-1.

significant production and material costs beyond the cost of the assemblies; *** indicated that there are such additional costs.[54]

Conclusion. The record indicates that the processes used to transform the six in-scope assemblies into finished LBCCs are not significant or particularly labor or capital intensive, notwithstanding the need for ***. The record also shows that assemblies are dedicated to the production of finished LBCCs and account for all or almost all of the value of finished LBCCs. Although each assembly has distinct physical characteristics corresponding to a unique function, all six assemblies contribute to the functionality of a finished LBCC and thus share the same end use. The record also indicates that there are not separate markets for assemblies and finished LBCCs, as all assemblies are used to produce LBCCs. Based on the record of the preliminary phase of the investigation, we define a single domestic like product consisting of LBCCs, including in-scope assemblies, coextensive with the scope.

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."[55] 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.

This investigation potentially raises two sets of domestic industry issues. The first concerns whether Link-Belt's domestic processing activities (which consists of assembling lattice booms and jibs that it produces domestically with other subassemblies imported from Japan into finished LBCCs) are sufficient to qualify it as a domestic producer. The second concerns whether appropriate circumstances exist to exclude any domestic producers from the domestic industry under the related parties provision of the statute.

[54] Manitowoc questionnaire response at VII-1; Link-Belt producer questionnaire response at VII-1. Link Belt described the *** Link-Belt producer questionnaire response at VII-1.

[55] 19 U.S.C. § 1677(4)(A).

A. Sufficient Production-Related Activities

In deciding whether a firm qualifies as a domestic producer of the domestic like product, the Commission generally analyzes the overall nature of a firm's U.S. production-related activities, although production-related activity at minimum levels could be insufficient to constitute domestic production.[56]

1. Arguments of the Parties

Petitioner's Arguments. Petitioner does not address whether, under the six-factors the Commission typically examines, Link-Belt engages in sufficient production-related activities to qualify as a domestic producer. Petitioner asserts that because Link-Belt is a U.S. producer of the in-scope lattice boom and jib assemblies, it is unnecessary to determine whether Link-Belt otherwise engages in sufficient production-related activities to qualify as a domestic producer.[57]

Respondents' Arguments. Link-Belt contends that its operations are sufficient for it to be considered a member of the domestic industry.[58] Link-Belt describes its domestic production activities as ***.[59] Among other claims under the six factors the Commission typically considers, Link-Belt asserts that it has made significant investments in its domestic production facilities and has expanded its production capabilities eleven times.[60] It also contends that its domestic production activities, including research and development (R&D) and testing, all add substantial value to the imported assemblies and that its domestic production of the lattice boom can account for *** percent to *** percent of the value of the

[56] The Commission generally considers six factors: (1) source and extent of the firm's capital investment; (2) technical expertise involved in U.S. production activities; (3) value added to the product in the United States; (4) employment levels; (5) quantity and type of parts sourced in the United States; and (6) any other costs and activities in the United States directly leading to production of the like product. No single factor is determinative and the Commission may consider any other factors it deems relevant in light of the specific facts of any investigation. *Crystalline Silicon Photovoltaic Cells and Modules from China*, Inv. Nos. 701-TA-481 and 731-TA-1190 (Final), USITC Pub. 4360 at 12-13 (Nov. 2012).

[57] Pet. Postconference Br. at 17 n.62.

[58] Link-Belt Postconference Br. at 5-12.

[59] Link-Belt Postconference Br. at 10.

[60] Link-Belt Postconference Br. at 9.

completed LBCC.[61] Finally, Link-Belt asserts that it employs over 700 workers at its Lexington facility and an additional 150 employees at its two affiliated distributors.[62]

2. Analysis

We consider below whether Link-Belt's production-related activities are sufficient to qualify it as a domestic producer.

Source and Extent of Capital Investment. Link-Belt reported that the greenfield replacement cost of its U.S. production facility is $***, while Manitowoc's reported greenfield replacement cost is $***.[63] During the 2022 to 2024 period of investigation ("POI"), Link-Belt reported capital investments of $*** and Manitowoc reported capital investments of $***.[64] On the other hand, Link-Belt's assets ranged from $*** to $*** during the POI, while Manitowoc's assets ranged from $*** to $***.[65]

Technical Expertise Involved. Link-Belt asserts that its domestic production operations involve a high level of technical expertise and skill, including welders, machine operators, and design engineers.[66] Link-Belt reported that its annual research and development ("R&D") expenses ranged from $*** to $*** during the POI, and that its average hourly wages ranged from $*** to $***.[67] Manitowoc also reported that its domestic operations involve a high level of expertise and reported that its annual R&D expenses ranged from $*** to $*** during the POI, and that its average hourly wages ranged from $*** to $***.[68]

Value Added. The value added annually by Link-Belt's processing operations ranged from *** percent to *** percent during the POI.[69] By comparison, the value added annually during the same period by Manitowoc's operations ranged from *** to *** percent.[70]

[61] Link-Belt Postconference Br. at 8.
[62] Link-Belt Postconference Br. at 9.
[63] CR/PR at Table 3.9.
[64] CR/PR at Tables 6.9, 6.11.
[65] CR/PR at Tables 6.9, 6.11.
[66] CR/PR at Table 3.10; Link-Belt Postconference Br. at 9.
[67] CR/PR at Tables 3.26, 6.11.
[68] CR/PR at Tables 3.10, 3.25, 6.9.
[69] CR/PR at Table 3.9.
[70] CR/PR at Table 3.9.

Employment Levels. The average annual number of production and related workers ("PRWs") involved in Link-Belt's operations was *** for each year of the POI.[71] The average annual number of PRWs involved in Manitowoc's operations ranged from *** during the POI. [72]

Quantity and Type of Parts Sourced in the United States. The record indicates that Link-Belt sourced *** percent of its parts domestically.[73] In contrast, Petitioner sourced *** percent of its parts domestically.[74]

Conclusion. While Link-Belt's capital investments during the POI were significant, they were considerably lower than *** and the value added by Link-Belt's processing operations was ***. Furthermore, Link-Belt sources a *** portion of its inputs from import sources. On the other hand, Link-Belt's employment levels were appreciable, and its net sales quantity was *** than Manitowoc's throughout the POI. On the basis of the available evidence in this preliminary phase investigation, we cannot conclude that Link-Belt's production-related activities are not sufficient to qualify it as a domestic producer, and we intend to examine the issue further in any final phase of the investigation.[75] In any case, as explained below, even assuming Link-Belt's production-related activities are sufficient to qualify it as a domestic producer, we find that appropriate circumstances exist to exclude Link-Belt from the domestic industry as a related party.

[71] CR/PR at Table 3.9.

[72] CR/PR at Table 3.9.

[73] CR/PR at Table 3.9.

[74] CR/PR at Table 3.9.

[75] Commissioner Kearns finds that the record is sufficient to find that Link-Belt does not engage in sufficient production-related activities to be included in the domestic industry definition. Along with the value added by Link-Belt's processing operations being *** and Link-Belt sourcing a *** portion of its inputs from import sources, Link Belt's assets and estimated greenfield replacement costs were ***. Indeed, Link Belt's net sales quantity was *** than Manitowoc's throughout the POI, but its assets and estimated greenfield replacement costs were nonetheless much *** than Manitowoc's. CR/PR at Tables 3.9, 6.1, 6.3. Its employment levels, while appreciable, are also ***. Accordingly, Commissioner Kearns defines the domestic industry as consisting only of Manitowoc and does not join the related parties discussion concerning Link-Belt. Because the majority finds that appropriate circumstances exist to exclude Link-Belt from the domestic industry definition as a related party, Commissioner Kearns ultimately has the same domestic industry definition as the majority.

B. Related Parties

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.[76] Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.[77]

U.S. processor Link-Belt qualifies as a related party because it is related to a subject producer and exporter of subject merchandise through a common parent company, and because it imported subject LBCC assemblies from Japan during the POI.[78]

1. Arguments of the Parties

Petitioner's Arguments. Petitioner argues that Link-Belt is subject to the related parties provision by virtue of its relationship to a subject producer/exporter and because it imports subject merchandise.[79] Petitioner argues that the Commission should find that appropriate circumstances exist to exclude Link-Belt from the domestic industry because subject imported

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[76] *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).

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

(1) the percentage of domestic production attributable to the importing producer;

(2) the reason the U.S. producer has decided to import the product subject to investigation (whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market);

(3) whether inclusion or exclusion of the related party will skew the data for the rest of the industry;

(4) the ratio of import shipments to U.S. production for the imported product; and

(5) whether the primary interest of the importing producer lies in domestic production or importation. *Changzhou Trina Solar Energy Co. v. USITC*, 100 F. Supp.3d 1314, 1326-31 (Ct. Int'l. Trade 2015) *aff'd*, 879 F.3d 1377 (Fed. Cir. 2018); *see also Torrington Co. v. United States*, 790 F. Supp. at 1168.

[78] CR/PR at 3.2, Tables 3.2, 7.2; Conf. Tr. at 109 (Shultz). Specifically, Link-Belt is related to Sumitomo Heavy Industries Construction Crane Co., Ltd, a U.S. importer and foreign producer and exporter of subject merchandise from Japan through their common parent. *Id.*

[79] Pet. Postconference Br. at 16.

assemblies account for most of the value of its LBCCs and benefitted its domestic production operations. Petitioner contends that during the POI, the value of Link-Belt's subject imported LBCC assemblies represented between *** percent and *** percent of the value of its U.S. commercial shipments of completed LBCCs.[80] It also contends that Link-Belt's ratio of subject imports to U.S. production is at least 100 percent.[81]

Petitioner further argues that Link-Belt's financial performance was helped by its imports of dumped subject LBCC assemblies ***.[82] Specifically, Petitioner claims that Link-Belt's reliance on subject imported LBCC assemblies *** on its LBCC sales.[83] Petitioner also contends that Link-Belt's inclusion in the domestic industry would skew the industry data because Link-Belt's ***.[84] Because Link-Belt's primary interest lies in importation, Petitioner argues, the Commission should exclude Link-Belt from the domestic industry.[85]

Respondents' Arguments. Link-Belt asserts that the Commission should include it in the domestic industry because it is one of only two domestic producers and its interest lies in domestic production.[86] It emphasizes that all subject imported assemblies are for internal consumption to support further U.S. manufacturing of LBCCs.[87] Claiming that its global supply chain is not unique within the domestic crane industry, Link-Belt alleges that Petitioner also imports large parts and components used in the production of LBCCs, including engines from China.[88] It also asserts that its U.S. production facility is capable of developing and producing entire LBCCs, and has done so in the recent past.[89]

Finally, Link-Belt argues that while the lattice boom attachment constitutes approximately *** of the total unit cost of an LBCC, this calculation overlooks the significant

[80] Pet. Postconference Br. at 18.
[81] Pet. Postconference Br. at 18.
[82] Pet. Postconference Br. at 19.
[83] Pet. Postconference Br. at 19.
[84] Pet. Postconference Br. at 20.
[85] Pet. Postconference Br. at 20.
[86] Link-Belt Postconference Br. at 6.
[87] Link-Belt Postconference Br. at 7.
[88] Link-Belt Postconference Br. at 7.
[89] Link-Belt Postconference Br. at 8.

additional domestic value added through the labor-intensive operations necessary to assemble a finished LBCC.[90]

2. Analysis

Link-Belt accounted for 100 percent of U.S. processing in 2024.[91] It opposes the Petition.[92] Link-Belt imported subject LBCC assemblies from Japan during the POI, including *** units in 2022, *** units in 2023, and *** units in 2024, for processing into LBCCs.[93] The ratio of Link-Belt's subject imports to its U.S. processing declined irregularly during the POI, increasing from *** percent in 2022 to *** percent in 2023 before declining to *** percent in 2024.[94] Link-Belt explained that ***.[95] Link-Belt's financial performance was *** stronger than Manitowoc's throughout the POI.[96]

Link-Belt's domestic processing operations appear to have benefitted from its importation of subject assemblies. In particular, Link-Belt used subject subcomponents to produce completed LBCCs. Link-Belt's ratio of subject imports to production during the POI was high. Thus, Link-Belt's *** stronger financial performance compared to Manitowoc appears to have resulted, at least in part, from its use of subject imports which as discussed below significantly undersold the domestic like product. Thus, inclusion of Link-Belt in the domestic industry would risk skewing the domestic industry data and masking injury to the domestic industry. For these reasons, based on the record of the preliminary phase of the investigation, we find that appropriate circumstances exist to exclude Link-Belt from the domestic industry.

Accordingly, we define the domestic industry to include all domestic producers of in-scope assemblies and LBCCs (*i.e.*, Manitowoc), but not U.S. processor Link-Belt.

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[90] Link-Belt Postconference Br. at Attachment 1, Question 3.

[91] CR/PR at Table 3.1.

[92] Conf. Tr. at 13.

[93] CR/PR at Table 3.23.

[94] CR/PR at Table 3.23.

[95] CR/PR at 5.6 n. 8; 6.1 n.3; Link-Belt Postconference Br. at Attachment 1, Question 3.

[96] CR/PR at Table 6.3. Link-Belt's operating income to net sales ratio was *** percent in 2022, *** percent in 2023, and *** percent in 2024. *Id.* In contrast, Petitioner's operating income to net sales ratio was *** percent in 2022, *** percent in 2023 and *** percent in 2024. *Id.* at Table 6.1.

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 three 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.[97]

During the 12-month period preceding the filing of the petitions (April 2024 through March 2025), imports of LBCCs from Japan accounted for *** percent of total imports.[98] Because subject imports exceed the three percent negligibility threshold, we find that imports from Japan subject to the antidumping duty investigation are not negligible.

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

A. Legal Standard

In the preliminary phase of antidumping 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.[99] In making this determination, the Commission must consider the volume of subject imports, their effect on prices for the domestic like product, and their impact on domestic producers of the domestic like product, but only in the context of U.S. production operations.[100] The statute defines "material injury" as "harm which is not inconsequential, immaterial, or unimportant."[101] In assessing whether there is a reasonable indication that the domestic industry is materially injured by reason of subject imports, we consider all relevant

[97] 19 U.S.C. §§ 1671b(a), 1673b(a), 1677(24)(A)(i). The exceptions to the general three percent rule are not applicable to this investigation.

[98] CR/PR at Table 4.7. This calculation relies on the limited data concerning nonsubject imports reported by responding importers. Even based on Petitioner's estimate of nonsubject import volume during the 12 months preceding the filing of the petition, 86 units, subject imports from Japan would have accounted for *** percent of total imports during the period. CR/PR at Table 4.7 note, Table 4.4.

[99] 19 U.S.C. §§ 1671b(a), 1673b(a).

[100] 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).

[101] 19 U.S.C. § 1677(7)(A).

economic factors that bear on the state of the industry in the United States.[102] 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."[103]

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,[104] 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.[105] 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.[106]

In many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry. Such economic factors might include nonsubject imports; changes in technology, demand, or consumer tastes; competition among domestic producers; or management decisions by domestic producers. The legislative history explains that the Commission must examine factors other than subject imports to

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[102] 19 U.S.C. § 1677(7)(C)(iii).

[103] 19 U.S.C. § 1677(7)(C)(iii).

[104] 19 U.S.C. §§ 1671b(a), 1673b(a).

[105] *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'g* 944 F. Supp. 943, 951 (Ct. Int'l Trade 1996).

[106] 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).

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.[107] In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.[108] 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.[109] It is clear that the existence of injury caused by other factors does not compel a negative determination.[110]

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[107] SAA at 851–52 ("{T}he Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports."); S. Rep. No. 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. No. 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.

[108] 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 & 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.")).

[109] S. Rep. No. 96-249 at 74–75; H.R. Rep. No. 96-317 at 47.

[110] *See Nippon Steel Corp*., 345 F.3d at 1381 ("{A}n 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."[111] 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."[112] The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed "rigid adherence to a specific formula."[113]

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.[114] Congress has delegated this factual finding to the Commission because of the agency's institutional expertise in resolving injury issues.[115]

B. Conditions of Competition and the Business Cycle

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

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[111] *Mittal Steel*, 542 F.3d at 876, 878; *see also id.* at 873 ("While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured 'by reason of' subject imports, the Commission is not required to follow a single methodology for making that determination . . . {and has} broad discretion with respect to its choice of methodology." (citing *U.S. Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996); S. Rep. No. 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*.

[112] *Mittal Steel*, 542 F.3d at 873, 877–79 (quoting *Gerald Metals*, 132 F.3d at 722). 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.

[113] *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.").

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

[115] *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. No. 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. Demand Conditions

Domestic demand for LBCCs is largely driven by general economic conditions and non-residential construction, including infrastructure spending.[116] Between January 2022 and December 2024, total U.S. nonresidential construction spending and total U.S. public construction spending increased by 40.9 percent and 39.4 percent, respectively.[117] The U.S. real gross domestic product also increased in nearly every quarter of the POI, with the exception of a decline in the first quarter of 2022.[118]

Petitioner and two of the three responding importers reported that demand for LBCCs is subject to business cycles, including non-residential construction activity, infrastructure spending, the oil and gas market, and changes in interest rates.[119] Demand for LBCCs can also be influenced by the replacement cycle, with most large rental companies replacing LBCCs about every 15 years and contractors every 20 to 25 years.[120]

Most firms reported an increase in demand since January 1, 2022.[121] Petitioner reported that overall U.S. demand for LBCCs has increased significantly since 2022 while U.S. importers reported that demand has steadily increased or fluctuated upward.[122]

Apparent U.S. consumption of LBCCs increased from *** units in 2022 to *** units in 2023 and *** units in 2024, for an overall increase of *** percent during the POI.[123]

2. Supply Conditions

The domestic industry was the third largest source of LBCCs in the U.S. market throughout the POI.[124] The industry's share of apparent U.S. consumption increased from ***

[116] CR/PR at 2.8.
[117] CR/PR at Tables 2.6, 2.7.
[118] CR/PR at Table 2.5.
[119] CR/PR at 2.9.
[120] CR/PR at 2.9.
[121] CR/PR at 2.9.
[122] CR/PR at 2.9, Table 2.4.
[123] CR/PR at Tables 4.8 & C.1.
[124] CR/PR at Tables 4.8, 4.9.

percent in 2022 to *** percent in 2023 before declining to *** percent in 2024, for an overall decline of *** percentage points.[125]

The domestic industry reported excess capacity throughout the POI.[126] Its practical LBCC capacity was flat at *** units during the POI.[127] The industry's practical LBCC capacity utilization rate increased from *** percent in 2022 to *** percent in 2023 and *** percent in 2024, for an overall increase of *** percentage points.[128]

Subject imports were the largest source of LBCCs in the U.S. market throughout the POI.[129] Subject imports' share of apparent U.S. consumption increased from *** percent in 2022 to *** percent in 2023 and *** percent in 2024, for an overall increase of *** percentage points.[130]

Nonsubject imports were the second-largest source of LBCCs in the United States throughout the POI.[131] Their share of apparent U.S. consumption decreased from *** percent in 2022 to *** percent in 2023 and *** percent in 2024, for an overall decrease of *** percentage points.[132] The primary sources of nonsubject imports were Germany, Austria, and China.[133]

Manitowoc reported that it did not experience supply constraints during the POI.[134] However, both responding U.S. importers reported experiencing supply constraints during the period.[135] Kobelco stated that it stopped producing LBCCs with Hino engines in 2021 because Hino failed EPA emission standards, which led Kobelco to transition to Isuzu motors.[136] It claims that this issue required it to curtail its production of LBCCs manufactured in Japan from

[125] CR/PR at Tables 4.9 & C.1.
[126] CR/PR at Tables 3.3, 3.4.
[127] CR/PR at Table 3.3.
[128] CR/PR at Table 3.3.
[129] CR/PR at Tables 4.8 & C.1.
[130] CR/PR at Tables 4.8 & C.1. U.S. importers' U.S. shipments from Japan include Link-Belt's assemblies and Kobelco's finished units.
[131] CR/PR at Tables 4.8 & C.1.
[132] CR/PR at Tables 4.8 & C.1.
[133] Pet. Postconference Br. at Exhibit 4.
[134] CR/PR at 2.8.
[135] CR/PR at 2.8.
[136] CR/PR at 2.8.

2021-2023, with the most serious supply constraints occurring in 2022, although it was able to maintain some level of production using properly certified engines. According to Kobelco, its production and exports did not normalize until 2024.[137] *** reported that a domestic producer of chord lugs (boom connecting pins) had financial difficulties and was unable to obtain sufficient quantities of raw material to meet *** production schedule in 2022.[138] *** claims that this issue caused a reduction in its production during the first half of 2023.[139]

3. Substitutability and Other Conditions

Based on the record in the preliminary phase of these investigations, we find that there is a moderate-to-high degree of substitutability between subject imports and domestically produced LBCCs. The responding domestic producer reported that LBCCs from Japan were always interchangeable with the domestic like product while all responding U.S. importers reported that LBCCs from Japan were sometimes interchangeable.[140] Differences in non-price purchasing factors, such as reliability and after-sales technical support, may limit substitutability to some extent.[141]

We also find that price is an important factor in purchasing decisions for LBCCs, among other important factors. Of the two responding purchasers, purchaser *** reported price, availability, and support as its top three purchasing factors and purchaser *** reported "assigned territory based on dealer agreement."[142] The responding domestic producer reported that differences other than price are never significant in sales of the domestic like product and LBCCs from Japan, while three responding U.S. importers reported that differences other than price are always significant.[143] Importer *** reported that after sales-service, including parts supply, is very important, as is ease of maintenance, less LBCC downtime, and

[137] CR/PR at 2.8; Kobelco's Postconference Br. at 4. Two of Kobelco's customers reported resuming their purchasers from the firm in early-to mid-2023. Kobelco's Postconference Br. at Ex. 20.
[138] CR/PR at 2.8.
[139] CR/PR at 2.8; Link-Belt's Postconference Br. at 2.
[140] CR/PR at Table 2.9.
[141] CR/PR at 2.14.
[142] CR/PR at 2.15.
[143] CR/PR at Table 2.10.

quality.[144] Importer *** reported that the competitive environment is based on product quality, service and support, and customized product offerings, and that customers often assess competing products not only by considering up-front cost, but also total cost (including maintenance) during the life of the LBCC.[145] We intend to further investigate the importance of factors other than price in any final phase of the investigation.

Petitioner and respondents reported selling LBCCs to distributors/dealers, and end users, with the vast majority sold to distributors/dealers.[146] The domestic producer reported that *** percent of its commercial shipments were produced to order, with lead times averaging *** days, while *** percent were from inventory, with lead times averaging *** days. Responding importers reported selling exclusively from inventory, with lead times of *** days from foreign inventory and *** days from U.S. inventory.[147]

During the POI, the domestic producer sold LBCCs via spot sales, while subject importers sold LBCCs through a mix of spot sales and annual contracts.[148] The domestic producer and importers reported setting prices using *** and one importer also reported selling on a transaction-by-transaction basis and via contracts.[149] The domestic producer and U.S. importers reported that they typically quote prices on an f.o.b. basis and also offer discounts.[150]

The primary raw material used in the production of LBCCs is high strength steel plate, specifically hot-rolled coil and carbon grade cut-to-length ("CTL") plate.[151] According to data from ***, worldwide prices for hot-rolled coil and CTL plate declined irregularly by *** percent

[144] CR/PR at 2.17.
[145] CR/PR at 2.17.
[146] CR/PR at Table 2.1.
[147] CR/PR at 2.14, 2.15.
[148] CR/PR at Table 5.4.
[149] CR/PR at Table 5.3.
[150] CR/PR at 5.5. Petitioner stated that it provides distributors a discount off the list price and that it generally looks to offer the same prices to all of its customers. Importer *** reported quantity and total volume discounts while *** reported that additional discounts are limited and granted on a case-by-case basis depending on the specific transaction. Importer *** reported discounts based on customer category. We intend to explore sale practices further in any final phase of the investigation.
[151] CR/PR at 5.1.

and *** percent, respectively, from January 2022 to April 2025.[152] Nevertheless, Petitioner reported that raw material costs had fluctuated up, stating that the cost of raw materials, parts, and components has generally increased.[153] The domestic industry's raw material costs increased as a share of its total cost of goods sold ("COGS") from *** percent in 2022 to *** percent in 2024.[154] Importers Kobelco and Link-Belt also reported that raw material costs had steadily increased during the POI.[155]

*** reported that there are no substitutes for LBCCs.[156] *** reported that there are substitutes, including telescopic crawlers or rough terrain cranes for bridge construction, telescopic boom crawler cranes for construction, and hydraulic truck cranes or rough terrain cranes for the oil and gas industry. Importer *** stated that customers typically buy LBCCs for their intended use, so the price of the substitutes does not impact the price of LBCCs.[157]

Certain steel components of LBCCs are subject to trade actions under section 232 of the Trade Expansion Act of 1962.[158] Specifically, effective February 10, 2025, imports under HTS subheadings 8431.49.10 and 8431.49.90 became subject to 25 percent duties upon the value of their steel content.[159] The President, effective April 5, 2025, increased the tariff on imports of LBCCs from Japan by an additional 10 percent under the International Emergency Economic Powers Act of 1977.[160]

[152] CR/PR at 5.1. Hot-rolled coil prices declined by *** percent from January 2022 to December 2024 before increasing by *** percent the first four months of 2025. *Id.* at 5.1-5.2. Similarly, CTL plate prices declined by *** percent from January 2022 to December 2024 before increasing by *** percent the first four months of 2025. *Id.*

[153] CR/PR at 5.1.

[154] CR/PR at Table 6.1.

[155] CR/PR at 5.1.

[156] CR/PR at 2.14.

[157] CR/PR at 2.14

[158] CR/PR at 1.9.

[159] CR/PR at 1.9.

[160] CR/PR at 1.9.

C. Volume of Subject Imports

Section 771(7)(C)(i) of the Tariff Act provides that the "Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant."[161]

The volume of subject imports increased by *** percent over the POI, from *** units in 2022 to *** units in 2023 and *** units in 2024.[162] Subject imports as a share of apparent U.S. consumption increased by *** percentage points over the POI, from *** percent in 2022 to *** percent in 2023 and *** percent in 2024.[163] The ratio of subject imports to U.S. production increased irregularly by *** percentage points over the POI, increasing from *** percent in 2022 to *** percent in 2023, then decreasing to *** percent in 2024.[164]

Based on the record in the preliminary phase of this investigation, we find that the volume of subject imports is significant in absolute terms and relative to consumption and production in the United States, and that the increase in that volume is significant in absolute terms and relative to consumption and production in the United States.

D. Price Effects of the Subject Imports

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

> (I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and
>
> (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.[165]

[161] 19 U.S.C. § 1677(7)(C)(i).
[162] CR/PR at 4.2, Table 4.2.
[163] CR/PR at 4.7, Table 4.8.
[164] *Derived from* CR/PR at Tables 3.3, 4.2.
[165] 19 U.S.C. § 1677(7)(C)(ii).

As discussed in section VI.B.3 above, we find that there is a moderate-to-high degree of substitutability between subject imports and domestically produced LBCCs and that price is an important factor in purchasing decisions, among other important factors.

The Commission collected quarterly pricing data from the responding domestic producer and U.S. importers for the total quantity and f.o.b. value of three pricing products shipped to unrelated customers during the POI.[166] The domestic producer and one U.S. importer provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.[167] Pricing data reported by these firms accounted for *** percent of U.S. shipments of domestically produced LBCCs and *** percent of U.S. shipments of subject imports from Japan.[168]

Subject imports undersold the domestic like product in all nine quarterly comparisons, corresponding to reported subject import sales of *** units, at margins ranging from *** to *** percent and averaging *** percent.[169]

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[166] The three pricing products are as follows:

Product 1.—Lattice boom crawler crane with a maximum lift capacity of 110 U.S. tons, boom length of 140-160 ft, with a base engine and model configuration, and without any jib or other attachments.

Product 2.—Lattice boom crawler crane with a maximum lift capacity of 200 U.S. tons, boom length of 200-220 ft, with a base engine and model configuration, and without any jib or other attachments.

Product 3.—Lattice boom crawler crane with a maximum lift capacity of 275 U.S. tons, boom length of 215-235 ft, with a base engine and model configuration, and without any jib or other attachments.

CR/PR at 5.5.

[167] CR/PR at 5.6.

[168] CR/PR at 5.6. Pricing coverage is based on U.S. shipments reported in responses to the Commission's questionnaires. *Id.* at 5.6 n.9. We invite the parties to comment on the pricing product definitions, or on how the pricing data coverage could be improved, in their comments on the draft questionnaires in any final phase of the investigation.

[169] CR/PR at Table 5.9. We have also considered purchasers' responses to the Commission's lost sales/lost revenue survey. Commission staff contacted two purchasers identified by domestic producers and received responses to the survey from both, which reported purchasing *** domestically produced LBCCs during January 2022 to December 2024. CR/PR at 5.15 and Table 5.11. Both reported that, since 2022, they had not purchased imported LBCCs from Japan instead of U.S. produced LBCCs. *Id.* However, one of these purchasers, ***, reported that it lost sales on behalf of the domestic producer to subject imports during the POI. *Id*. at 5.16.

Given the moderate-to-high degree of substitutability between subject imports and the domestic like product, the importance of price in purchasing decisions, and the pricing data showing subject import underselling in all nine quarterly comparisons, we find subject import underselling to be significant. As subject imports undersold the domestic like product, subject imports gained *** percentage points of market share from domestic producers from 2022 to 2024, with intensified underselling in 2024 leading to subject imports gaining *** percentage points of market share from the domestic industry from 2023 to 2024.[170] We find based on the record in this preliminary phase of the investigation that the underselling led to a shift in market share from the domestic industry to subject imports during the 2023-2024 period.

We have also examined price trends during the POI. Between the first and last quarters of the POI, domestic prices increased *** percent for product 1.[171] Prices for imports of product 1 from Japan also increased by *** percent over the same period.[172] In response to the lost sales/lost revenue survey, purchaser ***, estimated that the domestic producer reduced prices by *** percent due to competition from lower-priced subject imports.[173]

We have also examined whether subject imports prevented price increases which otherwise would have occurred to a significant degree. The domestic industry's COGS-to-net-sales was high throughout the POI, declining from *** percent in 2022 to *** percent in 2023 and *** percent in 2024, for an overall decrease of *** percentage points.[174] Although this ratio and the industry's unit COGS declined over the POI, the domestic industry's net sales AUV also declined and was below its unit COGS in every year of the POI.[175] The domestic industry's

[170] CR/PR at Table 4.8.

[171] CR/PR at Table 5.8. Domestic prices for product 3 increased irregularly by *** percent between the first and last quarters for which data are available. *Id*. at 5.13 n.10, Table 5.7, and Figure 5.4. The U.S. producer did not report any shipments of product 2 during this period. *Id.* at 5.13.

[172] CR/PR at Table 5.8. Price trends are not available for imports of products 2 and 3 from Japan due to insufficient data. *Id.* at. 5.13.

[173] CR/PR at 5.15. *** also stated that "***." *Id.* Another responding purchaser indicated that it did not know whether the domestic producer reduced prices to compete with low-priced subject imports. *Id.* We recognize that Manitowoc sells LBCCs to other purchasers in addition to ***, *id*., and intend to investigate the question of lost sales and revenues further in any final phase of the investigation.

[174] CR/PR at Tables 6.1 & C.1.

[175] CR/PR at Tables 6.1 & C.1.

unit COGS decreased over the POI from $*** in 2022 to $*** in 2024, for an overall decrease of $***, or *** percent.[176] At the same time, the AUVs of the domestic industry's net sales decreased from $*** in 2022 to $*** in 2024, for an overall decrease of $***, or *** percent.[177]

Given the domestic industry's high ratio of COGS to net sales during the POI, the industry would have had a strong economic incentive to capitalize on the *** percent increase in apparent U.S. consumption from 2022 and 2024 by raising prices sufficiently to cover its costs. Furthermore, although the industry's unit raw material costs declined during the POI, Manitowoc and responding importers reported that raw material costs generally increased during the period and the industry's raw material costs increased as a share of its total COGS from *** percent in 2022 to *** percent in 2024.[178] Despite strong demand and increasing raw material costs, however, the domestic industry was unable to increase its prices to an economic level over the POI, while competing with increasing volumes of low-priced subject imports. Accordingly, we find that subject imports suppressed prices for the domestic like product to a significant degree.[179]

In sum, based on the record in the preliminary phase of this investigation, we find that subject imports significantly undersold the domestic like product during the POI. This underselling led to a shift in market share from the domestic industry to subject imports from 2023 to 2024, and low-priced subject imports also suppressed prices for the domestic like

[176] CR/PR at Tables 6.1 & C.1. The domestic industry's unit raw material costs decreased from $*** in 2022 to $*** in 2024, for an overall decrease of $*** per unit, or *** percent. *Id*. at Table 6.1.

[177] CR/PR at Tables 6.1 & C.1.

[178] CR/PR at 5.1, Table 6.1.

[179] Chair Karpel does not join in this finding. She observes that Manitowoc's unit COGS declined by *** per unit between 2022 and 2024, which outpaced the decline in its net sales AUV at ***. CR/PR at Table 6.1. This led to an "improvement" in the firm's COGS-to-net-sales ratio, which decreased from *** percent in 2022 to *** percent in 2024, for an overall decrease of *** percentage points. *Id*. However, Manitowoc's COGS-to-net-sales ratio was over *** percent throughout the POI, and thus despite an improvement in its ratio over the POI, the increasing volume of subject import which universally undersold the domestic like product, may have contributed to Manitowoc's cost-price squeeze that persisted throughout the POI. Chair Karpel intends to further investigate in any final phase investigation the extent to which subject imports contributed to this. For these reasons, Chair Karpel cannot conclude, based on the available evidence in this preliminary phase investigation, that subject imports did not prevent price increases that would have otherwise occurred.

product to a significant degree. We therefore find that subject imports had significant adverse price effects.

E. Impact of the Subject Imports[180]

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 ("R&D"), 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."[181]

The domestic industry's trade, employment, and financial indicators improved over the POI as apparent U.S. consumption increased *** percent. As subject imports took market share from the domestic industry between 2023 and 2024 and suppressed domestic prices, however, the industry was unable to fully capitalize on strong demand growth during the period.

The domestic industry's practical LBCC capacity, *** units, did not change between 2022 and 2024.[182] Its LBCC production increased by *** percent over the POI, from *** units in 2022 to *** units in 2023 and *** units in 2024.[183] The domestic industry's practical LBCC capacity utilization increased by *** percentage points over the POI, from *** percent in 2022 to *** percent in 2023 and *** percent in 2024.[184]

The domestic industry's employment indicators improved over the POI. The number of production and related workers ("PRWs") increased by *** percent over the POI, from ***

[180] Commerce initiated the antidumping duty investigation based on an estimated dumping margin of 157.43 percent for subject imports from Japan. *Lattice Boom Crawler Cranes From Japan: Initiation of Less-Than-Fair-Value Investigation,* 90 Fed. Reg. 19270 (May 7, 2025).

[181] 19 U.S.C. § 1677(7)(C)(iii).

[182] CR/PR at 3.3, Tables 3.3, 3.11.

[183] CR/PR at 3.3, Tables 3.3, 3.11.

[184] CR/PR at 3.3, Tables 3.3, 3.11.

PRWs in 2022 to *** PRWs in 2023 and *** PRWs in 2024.[185] The industry's total hours worked increased by *** percent over the POI, from *** hours in 2022 to *** hours in 2023 and *** hours in 2024.[186] Hourly wages paid increased by *** percent over the POI, from $*** per hour in 2022 to $*** per hour in 2023 and $*** per hour in 2024.[187] Productivity increased by *** percent over the POI, from *** units per million hours in 2022 to *** units per million hours in 2023 and *** units per million hours in 2024.[188]

The domestic industry's U.S. shipments increased by *** percent over the POI, from *** units in 2022 to *** units in 2023 and *** units in 2024.[189] The industry's share of apparent U.S. consumption decreased irregularly by *** percentage points over the POI, increasing from *** percent in 2022 to *** in 2023, then decreasing to *** percent in 2024.[190]

The domestic industry's end-of-period inventories decreased from *** unit in 2022 to *** units in 2023 and 2024.[191] As a share of total shipments, the domestic industry's end-of-period inventories decreased from *** percent in 2022 to *** percent in 2023 and 2024.[192]

The domestic industry's financial performance was better at the end than the beginning of the POI, although the industry experienced financial losses throughout the period. Its commercial sales value increased by *** percent over the POI, from $*** in 2022 to $*** in 2023 and $*** in 2024.[193] Its *** improved from *** in 2022 to *** in 2023 and *** in 2024.[194] The industry's operating and *** also improved irregularly during the POI, worsening from *** in 2022 to *** in 2023, then improving to *** in 2024.[195] The industry's operating and net losses as a ratio to net sales narrowed by *** percentage points over the POI, from *** percent in 2022 to *** percent in 2023 and *** percent in 2024.[196]

[185] CR/PR at 3.20, Table 3.25.
[186] CR/PR at 3.20, Table 3.25.
[187] CR/PR at 3.20, Table 3.25.
[188] CR/PR at 3.20, Table 3.25.
[189] CR/PR at 3.12, Table 3.14.
[190] CR/PR at 4.7, Table 4.8.
[191] CR/PR at 3.18, Table 3.21.
[192] CR/PR at 3.18, Table 3.21.
[193] CR/PR at Table 6.1.
[194] CR/PR at Tables 6.1 & C.1.
[195] CR/PR at Tables 6.1 & C.1.
[196] CR/PR at Tables 6.1 & C.1.

The domestic industry's capital expenditures increased irregularly by *** percent over the POI, increasing from $*** in 2022 to $*** in 2023, then decreasing to $*** in 2024.[197] The industry's R&D expenses increased irregularly by *** percent over the POI, decreasing from $*** in 2022 to $*** in 2023, then increasing to $*** in 2024.[198] The industry's return on assets improved irregularly by *** percentage points over the POI, increasing from *** percent in 2022 to *** percent in 2023, then decreasing slightly to *** percent in 2024.[199]

As discussed above, over the POI, the volume and market share of subject imports increased significantly as they undersold the domestic like product to a significant degree. Although the domestic industry's performance improved by most measures during the POI, increasing volumes of low-priced subject imports took market share from the domestic industry and suppressed domestic prices to a significant degree,[200] preventing the industry from fully capitalizing on the *** percent increase in apparent U.S. consumption during the period. As a result, the domestic industry's production, U.S. shipments, net sales values, gross profits, operating and net income, and operating and net income margins were weaker than they would have been but for subject imports. Consequently, we find that subject imports had a significant adverse impact on the domestic industry.[201]

Respondents argue that the increase in subject imports and their market share gain resulted not from underselling but from Kobelco re-entering the U.S. market after addressing EPA compliance issues with its engines.[202] They contend that subject import volumes did not have a significant impact on the domestic industry during the POI because they did not prevent Manitowoc from ***.[203] Kobelco also argues that there is no correlation between subject

[197] CR/PR at Tables 6.9 & C.1.

[198] CR/PR at Tables 6.9 & C.1.

[199] CR/PR at Table 6.9.

[200] As noted above, Chair Karpel cannot conclude that subject imports did not prevent price increases that would have otherwise occurred.

[201] Chair Karpel notes that there are several issues that require further investigation in any final phase investigation, including: the degree of competition between subject imports of LBCCs assemblies and finished LBCCs; the impact of the price of imported assemblies on the price of domestically-manufactured finished LBCCs; the impact of after-sales service and maintenance costs in purchasing decisions; and the nature of price negotiations and the degree of price transparency in this market.

[202] Link-Belt Postconference Br. at 20-21; Kobelco Postconference Br. at 10.

[203] Link-Belt Postconference Br. at 20-21; Kobelco Postconference Br. at 10.

imports and the domestic industry's performance.[204] All of respondents' arguments, however, fail to account for the significant underselling by subject imports and their significant suppressing effects that prevented the domestic industry from increasing its prices above its costs during a period of increasing U.S. consumption – leaving the industry to operate at a *** throughout the POI. In any final phase of the investigation, we intend to explore further whether a reentry by Kobelco into the U.S. market to supply loyal customers explains the market share shift from the domestic industry to subject imports at the end of the POI.

We have also considered whether there are other factors that may have had an impact on the domestic industry, to ensure that we are not attributing injury from such other factors to subject imports. As discussed in section VI.B.2 above, nonsubject imports' share of apparent U.S. consumption declined from 33.6 percent in 2022 to *** percent in 2023 and 23.4 percent in 2024. While the declining market share of nonsubject imports indicates that such imports do not explain the injury to the domestic industry during the POI, the record of this preliminary phase investigation contains limited information on nonsubject imports. Accordingly, in any final phase of the investigation, the Commission will seek to collect additional information on nonsubject imports.

Link-Belt and Sumitomo argue that any harm Manitowoc suffered during the POI resulted from a large fine imposed by the EPA, Manitowoc's LBCC marketing strategy, and tariffs on the imported components from China that Manitowoc utilizes to manufacture LBCCs.[205] We intend to further investigate the role of these factors in any final phase of the investigation.

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 imports of LBCCs from Japan that are allegedly sold in the United States at LTFV.

[204] Kobelco Postconference Br. at 16, 18-19.
[205] Link-Belt Postconference Br. at 26-27.

Part 1: Introduction

Background

This investigation results from a petition filed with the U.S. Department of Commerce ("Commerce") and the U.S. International Trade Commission ("USITC" or "Commission") by The Manitowoc Company, Inc. ("Manitowoc"), Milwaukee, WI, on April 10, 2025, alleging that an industry in the United States is materially injured and threatened with material injury by reason of less-than-fair-value ("LTFV") imports of lattice-boom crawler cranes ("LBCCs")[1] from Japan. Table 1.1 presents information relating to the background of this investigation.[2] [3]

Table 1.1 LBCCs: Information relating to the background and schedule of this proceeding

Effective date	Action
April 10, 2025	Petitions filed with Commerce and the Commission; institution of the Commission investigation (90 FR 15989, April 16, 2025)
May 1, 2025	Commission's conference
May 7, 2025	Commerce's notice of initiation (90 FR 19270, April 30, 2025)
May 23, 2025	Scheduled date for the Commission's vote
May 27, 2025	Scheduled date for the Commission's determination
June 3, 2025	Scheduled date for the Commission's views

[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.

Statutory criteria

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

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

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

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

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

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

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

Organization of report

Part 1 of this report presents information on the subject merchandise, alleged 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.

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

Market summary

LBCCs are generally used in the construction and repair of transportation systems (highways, bridges), dams, submarines, nuclear reactors, and wind towers.[6] The leading U.S. producers of LBCCs are Manitowoc and Link-Belt Cranes ("Link-Belt"), while leading producers of LBCCs outside the United States include Kobelco Construction Machinery ("Kobelco") and Sumitomo Heavy Industries Clean Construction Cranes Co., Ltd ("Sumitomo") of Japan, Liebherr Crane Co ("Liebherr") of Germany, and Sany International Development ("Sany") of China.[7] The leading U.S. importers of LBCCs from Japan are Kobelco and Link-Belt. Leading importers of LBCCs from nonsubject countries (primarily Austria, Germany, and China) include Liebherr and Sany. U.S. purchasers of LBCCs are firms that rent cranes, construction companies and distributors; the leading responding purchaser of LBCCs is ***.

Apparent U.S. consumption of LBCCs totaled approximately *** units in 2024.[8] Currently, one firm is known to produce LBCCs in the United States and one firm is known to process LBCCs in the United States. U.S. producer and processors' U.S. shipments of LBCCs totaled *** units in 2024. The U.S. producer's U.S. shipments of LBCCs totaled *** units (***) in 2024. The U.S. processor's U.S. shipments of LBCCs totaled *** units (***) in 2024. The U.S. processor added *** in value to imports in 2024. Total apparent consumption of U.S. imports from subject sources totaled *** units (***) in 2024 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from nonsubject sources totaled *** 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 this investigation 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 two firms that accounted for virtually all U.S. production of LBCCs during 2024. U.S. imports are based on data submitted in response to Commission questionnaires.[9]

[6] Petition, p. 1.

[7] Petition, exhibit 2.

[8] Value of domestic apparent consumption is omitted from this report because the source of this data is limited to estimates presented in the petition.

[9] Additional import data was collected via ***. Petition, p. 5.

Previous and related investigations

LBCCs have not been the subject of prior antidumping duty investigations in the United States.

Nature and extent of alleged sales at LTFV

Alleged sales at LTFV

On May 7, 2025, Commerce published a notice in the Federal Register of the initiation of its antidumping duty investigation on LBCCs from Japan. Commerce has initiated antidumping duty investigations based on estimated dumping margins of 157.43 percent for LBCCs from Japan.[10]

[10] 90 FR 19270, May 7, 2025.

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:[11]

> *The merchandise covered by this investigation consists of lattice boom crawler cranes, and lattice boom crawler crane assemblies. Lattice boom crawler cranes combine the assemblies defined below, among other components, including a lower carriage assembly fitted with tank-link crawler tracks, an upper carriage housing the operator cab, engine, and hydraulics, and a boom made of steel pipe welded together in a distinctive lattice pattern. The scope of this investigation covers lattice boom crawler cranes and lattice boom crawler crane assemblies, whether assembled or unassembled, and whether or not the lattice boom crawler crane contains any additional features that provide for functions beyond the primary lifting function. All lattice boom crawler cranes are included in the scope regardless of maximum lift capacity, lattice boom length, jib configuration, or other added features.*
>
> *Subject merchandise includes, but is not limited to, the following lattice boom crawler crane assemblies which can be imported in isolation or combined in different configurations at the time of import:*
>
> - *Lattice boom assemblies and pieces thereof. Lattice boom assemblies are formed of interlocking sections of welded high-strength steel pipe, that form the lifting attachment of the crane. A lattice boom is formed by welding main chords together with lacing pipes typically arranged in a "W" or "V" pattern. Lattice boom assemblies consist of a boom butt (also known as a boom bottom or boom base), which attaches to the upper carriage assembly, and a boom head (also known as a boom tip or boom hat), which forms the other end of the boom structure. In between the boom butt and boom head, boom inserts of various lengths can be inserted to reach the desired boom height and load bearing capability. Lattice boom assemblies may be imported with boom butt, boom tip, and boom inserts together, but boom butt, boom tip, and boom inserts imported alone are also covered by the scope.*
> - *Lower carriage assembly. The lower carriage assembly (also may be referred to as a carbody or lower works) is constructed with high-strength steel components and forms the base of the crawler crane. The lower carriage assembly typically includes various motors, drive*

[11] 90 FR 19270, May 7, 2025.

mechanisms, and hydraulics. The lower carriage assembly may also include a set of counterweights to provide backward stability for the assembled crane. The lower carriage typically has a circular center that is connected to the upper carriage assembly with a bearing. The lower and upper carriage assemblies may or may not be connected by a bearing at the time of importation. Steel arms extend from the center of the lower carriage and connect to the front and rear of the crawler assemblies that are positioned on both sides of the lower carriage assembly. The lower carriage assembly may also contain a hydraulic system that allows for the extension and retraction of the crawler assemblies to create a wider base. A lower carriage assembly may be imported with or without crawler assemblies.

- *Crawler assembly. Each lattice boom crawler crane contains at least two crawler assemblies, which are continuous tracks that provide mobility and distribute the crane's weight evenly across the ground. The tracks of a lattice boom crawler crane consist of steel track shoes, which are interlocking steel plates that form the tread of the tracks and make direct contact with the ground, a track chain, which is a continuous loop of interconnected steel links, and a crawler body and track rollers, which support the track shoes and track chain. Typically, drive motors mounted on the lower carriage assembly connect to crawler-mounted drive sprockets, which engage the track chain and allow the LBCC to move forward and backward.*
- *Upper carriage assembly. The upper carriage assembly, also known as the upper works, typically includes the operator's cab, hydraulic systems, engine, boom hoist, mast, and a turntable base with swing drive mechanism that connects to the lower carriage assembly and allows the upper carriage to pivot on the lower carriage assembly. The upper and lower carriage assemblies may or may not be connected by a bearing at the time of importation. The upper carriage assembly may also include a separate counterweight tray and counterweights, which allow the crane to maintain balance while lifting heavy loads, as well as a gantry, which helps lift the boom and counterweights during installation, although the counterweight tray, counterweights, and gantry are not required to be attached for the upper carriage assembly to be a subject assembly. The boom butt may or may not be attached to the upper carriage assembly at the time of entry.*
- *Hoisting assembly. The hoisting assembly, housed within the upper carriage assembly and lattice boom assembly, powers the lifting and lowering of loads and typically consists of a hoisting line of high strength steel cable, a hoist motor, hoist brakes, hoisting drums, and a hook block formed from steel sheaves, which helps distribute the load on the hoisting line and increases lifting capacity. The main hoisting line typically runs from the hoist drums, housed in the upper carriage*

assembly, up through the lattice boom (which may or may not house additional hoist drums) and hook block.

- *Jib assemblies. Jib assemblies are optional components that can be added to the top end of the boom to provide the crane with greater reach. Similar to lattice boom assemblies, jib assemblies typically consist of interlocking sections of welded steel pipe, arranged in a "V" or "W" lattice pattern. Jib assemblies can consist of either fixed jib, which extends from the main lattice boom at a fixed angle, or a luffing jib, which can be raised or lowered by the operator through a separate set of controls.*

Importation of any of these assemblies, whether assembled or unassembled, constitutes unfinished lattice boom crawler cranes for purposes of this investigation. Inclusion of other components not identified as comprising the finished or unfinished lattice boom crawler cranes and lattice boom crawler crane assemblies do not remove the products from the scope.

Processing of lattice boom crawler cranes and lattice boom crawler crane assemblies such as welding, joining, bolting, painting, coating, finishing, or assembly, either in the country of manufacture of the in-scope product or in a third country does not remove the product from the scope. Lattice boom crawler cranes and lattice boom crawler crane assemblies subject to this investigation include those that are produced in the subject country whether assembled with other components in the subject country or in a third country. Processing or completion of finished and unfinished lattice boom crawler cranes and the covered lattice boom crawler crane assemblies either in the subject country or in a third country does not remove the product from the scope.

Tariff treatment

Lattice boom crawler cranes (LBCCs) and assemblies are classified in the Harmonized Tariff Schedule of the United States ("HTS") under statistical reporting numbers 8426.49.0010, 8426.49.0090, and 8431.49.1090. LBCCs imported from Japan enter the United States market at a column 1-general duty rate of 0 percent ad valorem. LBCC assemblies are imported under HTS statistical reporting numbers 8487.90.0080 and 8425.19.0000. LBCCs assemblies imported from Japan enter the United States market at a column 1-general duty rate of 3.9 percent ad valorem for HTS statistical reporting number 8487.90.0080 and 0 percent ad valorem for HTS statistical reporting number 8425.19.0000. Additionally, on April 5, 2025, the Trump Administration implemented an additional 10 percent tariff on all Japanese exports to the United States under the International Emergency Economic Powers Act of 1977.[12] Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Certain steel components of LBCCs are subject to trade actions under section 232 of the Trade Expansion Act of 1962. As of February 10, 2025, HTS subheadings 8431.49.10 and 8431.49.90 are subject to 25 percent duties upon the value of steel content.

[12] White House, "Fact Sheet: President Donald J. Trump Declares National Emergency to Increase our Competitive Edge, Protect our Sovereignty, and Strengthen our National and Economic Security," April 2, 2025, https://www.whitehouse.gov/fact-sheets/2025/04/fact-sheet-president-donald-j-trump-declares-national-emergency-to-increase-our-competitive-edge-protect-our-sovereignty-and-strengthen-our-national-and-economic-security/.

The product

Description and applications

Lattice boom crawler cranes are gas-powered cranes used for lifting, lowering, and moving heavy loads at extended reach capacities. LBCCs are primarily used in the construction and heavy-lifting industries on construction projects, including ports, bridges, industrial buildings, power plants, wind turbines, and other projects where heavy lifting is required.[13] With lift capacities ranging from 70 tons to 2,300 tons, LBCCs are designed to lift varying weights of cargo at different heights.[14] The life expectancy of a LBCC is dependent on the use of the product. If a LBCC is rented out, the life expectancy is 15 to 20 years, while if the LBCC is bought by an end user, the life expectancy is between 50 and 60 years.[15] Additionally, an LBCC can be refurbished and released back into the market for up to 20 years.[16] Since LBCCs range in size, larger parts like the crawler are not interchangeable with LBCCs of different sizes; however, smaller parts like valves can be salvaged for other types of LBCCs.[17] While one LBCC includes thousands of materials and components, the assemblies can be broken up into the lattice boom assemblies, lower carriage assembly, crawler assembly, upper carriage assembly, hoisting assembly, and jib assemblies (figure 1.1).[18]

[13] Petition, p. 11.

[14] Petition, p. 11; Manitowac, "Lattice-Boom Crawler Cranes," https://www.manitowoc.com/manitowoc/lattice-boom-crawler-cranes, retrieved April 23, 2025.

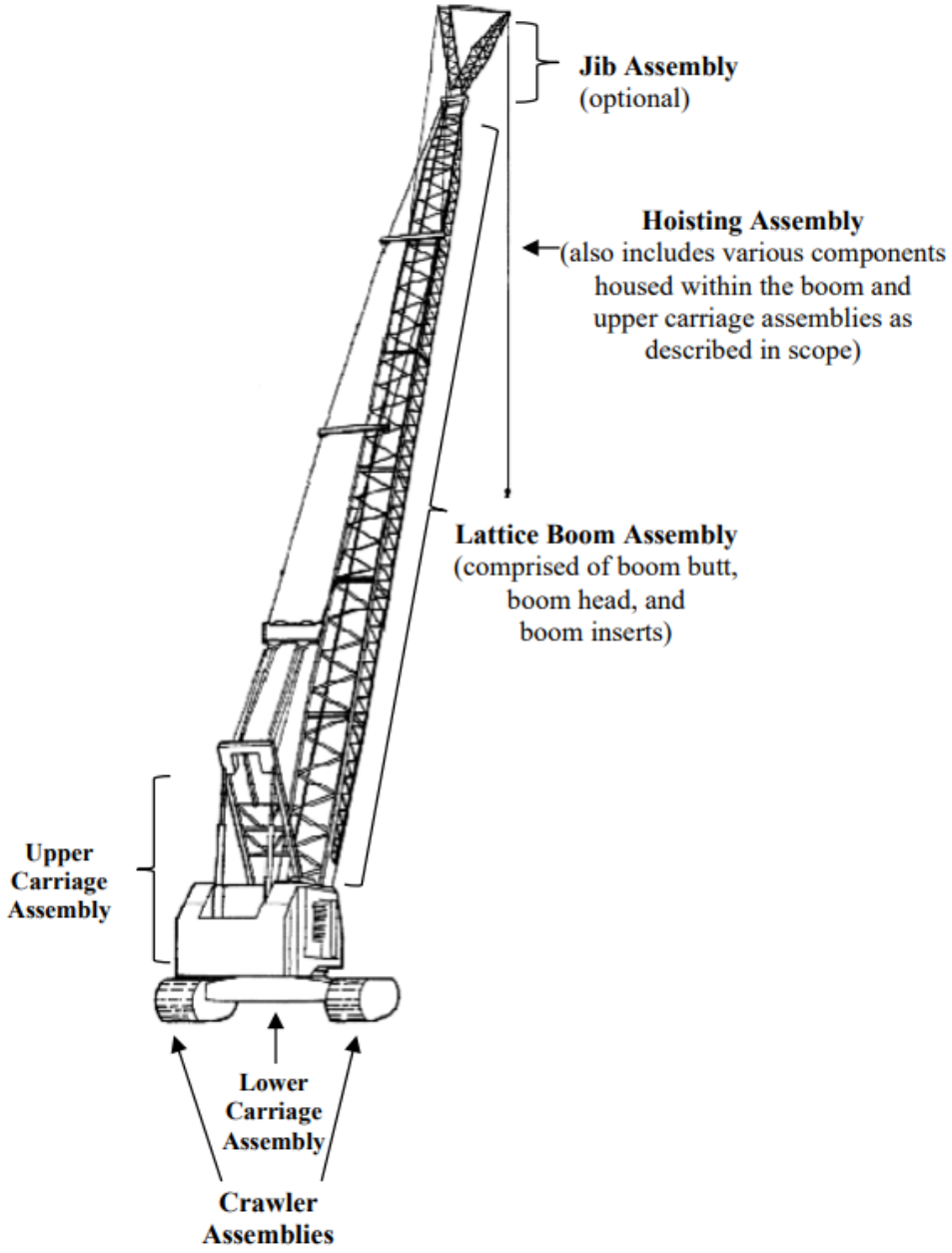
[15] *See* Transcript of Preliminary Staff Conference, EDIS Doc. 850632 (May 1, 2025) 35 (Konkle).

[16] *See* Transcript of Preliminary Staff Conference, EDIS Doc. 850632 (May 1, 2025) 36 (Konkle).

[17] *See* Transcript of Preliminary Staff Conference, EDIS Doc. 850632 (May 1, 2025) 41 (Konkle).

[18] *See* Transcript of Preliminary Staff Conference, EDIS Doc. 850632 (May 1, 2025); Petition, pp. 8 to 10.

Figure 1.1. Key Assemblies of a Lattice Boom Crawler Crane



Source: Petition, p. 12.

The lattice-patterned boom assembly is the lifting attachment of the crane, and it is primarily fabricated from high strength steel pipe and interlocking sections.[19] It is formed by welding the components together arranged in a "W" or "V" pattern.[20] The boom butt is used to

[19] Petition, pp. 8–9.
[20] Petition, p. 8.

attach the upper carriage assembly and the boom head to form the boom structure.[21] Between the boom butt and the boom head, boom inserts can be inserted to reach the desired length and load bearing capacity.[22] Jib assemblies are optional components that can be added to the top of the crane to provide greater reach; these assemblies typically consist of interlocking sections of welded steel pipe, arranged in a "V" or "W" lattice pattern.[23]

The upper carriage assembly typically includes the operator's cab, hydraulic systems, engine, boom hoist, mast, and a turntable base.[24] This assembly may also include a separate counterweight tray and counterweights to ensure stability while the crane is lifting heavy loads.[25] A gantry is used to help lift the counterweights for installation and removal. The upper carriage includes the circular swing drive mechanism or bearing that connects to the lower carriage assembly and allows the upper carriage to swivel 360 degrees.[26]

The lower carriage assembly is constructed using high strength steel components that form the base of the crane; this assembly includes various motors, drive mechanisms, and hydraulics.[27] The lower carriage assembly may also include counterweights to further ensure stability.[28] Extending from the center of the lower carriage assembly are steel arms which connect to the front and rear of the crawler assembly that are positioned on the left and right sides of the lower carriage assembly.[29] The crawler assembly is composed of at least two continuous tracks that provide mobility and distribute the crane's weight evenly. The tracks consist of steel track shoes forming the tread of the track, a track chain (a continuous loop of interconnected steel links), a crawler body, and track rollers which support the track shoes and train.[30] Drive motors are located within the lower carriage assembly and connect to the crawler-mounted drive sprockets allowing the crane to move forward and backward.[31]

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[21] Petition, pp. 8 to 9. A boom butt is also known as a boom bottom or boom base, and the boom head is also known as a boom tip or boom hat.

[22] Petition, pp. 8 to 9.

[23] Jib assemblies can be either fixed jibs which extend from the lattice boom at a fixed angle, or luffing jib which can be raised or lowered using a separate set of controls. Petition, p. 10.

[24] Petition, p. 9.

[25] Petition, p. 9.

[26] The lower carriage assembly is also called the car body. Staff conference; Petition, p. 9.

[27] Petition, p. 9.

[28] Petition, p. 9.

[29] The lower carriage assembly may also include a hydraulic system for extending and retracting of the crawler assembly to create a wider base. Petition, p. 9.

[30] Petition, p. 9.

[31] Petition, p. 9.

Housed within the upper carriage assembly and the lattice boom assembly is the hoisting assembly.[32] The hoisting assembly is used for lifting and lowering loads; it is made of the hook block, hoist motor, hoist brakes, hoisting drums, and hoisting line. The hook block is made of steel sheaves which helps to distribute the load and increase lifting capacity.[33] The hoisting line is made of high-strength steel cable and runs through the hoist drum (located in the upper carriage) and through the lattice boom and hook block.[34] Finally, LBCCs are typically transported to the project site in subassemblies which are assembled using other cranes or through self-assembly functions (figure 1.2).[35]

Figure 1.2. Lattice boom crawler crane

Source: Manitowoc, "Lattice-Boom Crawler Cranes," https://www.manitowoc.com/manitowoc/lattice-boom-crawler-cranes, retrieved April 23, 2025.

[32] Petition, p. 10.

[33] Petition, p. 10.

[34] The hook block connects the lattice boom to the load. Petition, p. 10; RIS, "The Way To Use A Crane Block," January 4, 2024, https://www.valuecrane.com/the-way-to-use-a-crane-block/.

[35] Self-assembly functions enable the crane to be assembled using its own parts.

Manufacturing processes

Manufacturing facilities have adopted lean manufacturing principles to help eliminate waste and continuously improve the product.[36] LBCC manufacturing includes the use of robotic welding to weld 85-90 percent of the product, and highly skilled welders weld the other 10-15 percent.[37] Since LBCCs can greatly range in size and lift capacities, manufacturing timelines vary from product to product and range from 40 to 150 days.[38]

Producers start in the design and engineering process, where engineers use advanced technology to design the components to ensure proper lift capacity; it is common for customers to provide input during the design and engineering process.[39] On the manufacturing side, high strength steel plates are laser cut to specific shapes; these components are then joined together through laser welding or fastened with bolts to create structures of various assemblies.[40] Additional components including electronics, hydraulics, and motors are then added to the assemblies.[41]

For the crawler, the track chain, seen in figure 1.3, is forged using high strength alloy steel which is then shaped through multiple forging strokes and heat cycles before the chain links are cooled and cleaned.[42] The upper and lower carriage assemblies are manufactured using high strength steel components and include various systems and electronics required to operate the crane.[43]

[36] *See* Transcript of Preliminary Staff Conference, EDIS Doc. 850632 (May 1, 2025) 46 (Konkle); Transcript of Preliminary Staff Conference, EDIS Doc. 850632 (May 1, 2025) 107 (Collins).

[37] *See* Transcript of Preliminary Staff Conference, EDIS Doc. 850632 (May 1, 2025) 45 (Konkle).

[38] *See* Transcript of Preliminary Staff Conference, EDIS Doc. 850632 (May 1, 2025) 66 (Konkle).

[39] *See* Transcript of Preliminary Staff Conference, EDIS Doc. 850632 (May 1, 2025) 20, 84 (Konkle).

[40] These assemblies include the upper carriage assembly, lower carriage assembly, crawler assembly, and hoisting assembly; Petition, p. 13.

[41] Petition, p. 13.

[42] RIS, "How To Produce A Crawler Crane Track Chain?" January 18, 2024, https://www.valuecrane.com/how-to-produce-a-crawler-crane-track-chain/.

[43] Petition, p. 9.

Figure 1.3. Crawler track chain

Source: RIS, "How To Produce A Crawler Crane Track Chain?" January 18, 2024, https://www.valuecrane.com/how-to-produce-a-crawler-crane-track-chain/.

Using steel products, workers will weld together pieces of the lattice boom and jib assemblies from high strength structural steel pipe.[44] In order to form the pipes, the sides of a flat steel sheet are welded together or by piercing steel rods (figure 1.3).[45] The assemblies are then sent off to painting and testing before joining upper carriage, lower carriage, crawler, and hoisting assemblies on the assembly line.[46] Assemblies are then joined together to create the final LBCC, which is then sent off for inspection and testing. LBCCs are often disassembled before shipment, which can require between 3 and 50 truckloads depending on the size of the product; they are then reassembled at the job site.[47] The manufacturing process for imported LBCC assemblies is labor-intensive and contains multiple steps at the manufacturing facility and the job site.[48]

[44] Petition, p. 13.

[45] Landwehr, "How cranes are made", December 7, 2020, https://landwehrconstruction.com/how-cranes-are-made/.

[46] Petition, p. 13.

[47] Petition, p. 13.

[48] The manufacturing process in the United States is very similar to the manufacturing process in Japan. Kobelco's Postconference Brief, Appendix A, p. 8.

Figure 1.4. Lattice boom section of a crane

Source: Crane Market, “Kobelco CK1600G 160-Ton Lattice Boom Crawler Crane For Sale or Rent,” retrieved April 28, 2025, https://cranemarket.com/kobelco-ck1600g-160-ton-lattice-boom-crawler-crane-for-sale-or-rent-id1600.

Domestic like product issues

The petitioner proposes that the Commission should define a single domestic like product consisting of LBCCs, coextensive with the proposed scope of the investigations.[49] Respondent Link-Belt proposes that the Commission finds that finished LBCCs and subassemblies are separate like products.[50]

U.S. producers and importers were asked to assess any differences between complete LBCCs and in-scope subassemblies of LBCCs based on factors the Commission considers in a semi-finished products analysis, including (1) whether the upstream article is dedicated to the production of the downstream article or has independent uses; (2) whether there are perceived to be separate markets for the upstream and downstream articles; (3) differences in the physical characteristics and functions of the upstream and downstream articles; (4) differences in the costs or value of the vertically differentiated articles; and (5) the significance and extent of the processes used to transform the upstream into the downstream articles. Responses provided by firms are summarized in table 1.2 below (where a 'no' response generally corresponds to indicating no differences or distinctions between complete LBCCs and in-scope subassemblies of LBCCs). Additional narratives on finished and unfinished merchandise can be found in Appendix D.

Table 1.2 LBCCs: Count of firms' responses regarding semi-finished product analysis comparing semi-finished LBCC subassemblies to finished LBCCs, by factor and firm type

Count in number of firms reporting

Firm type	Factor	No	Yes
U.S. producers and U.S. processors	Other uses	***	***
U.S. producers and U.S. processors	Separate market	***	***
U.S. producers and U.S. processors	Differences in characteristics	***	***
U.S. producers and U.S. processors	Differences in costs	***	***
U.S. producers and U.S. processors	Transformation intensive	***	***
Importers	Other uses	***	***
Importers	Separate market	***	***
Importers	Differences in characteristics	***	***
Importers	Differences in costs	***	***
Importers	Transformation intensive	***	***

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

Note: Firm by firm narratives regarding semi-finished product analysis are available in appendix D.

[49] Petitioner's petition, p. 22.

[50] Link-Belt postconference brief, p. 2.

Part 2: Conditions of competition in the U.S. market[1]

U.S. market characteristics

LBCCs are a type of mobile heavy-duty crane that is characterized by a fixed lattice-boom and tank-like crawler tracks.[2] The ultimate use of an LBCC is to lift and move large and heavy loads over a wide radius. They are commonly used in major construction projects such as those for large buildings, stadiums, power plants, refineries, wind farms, and infrastructure projects like bridges and highways. LBCCs are also rated to operate on barges and heavily used in off-shore and coastal environments.[3] Purchasers can include large national rental companies, regional rental companies, general contractors, and entities such as the U.S. government.[4] LBCCs can last 15 to 20 years for rental companies and 40 to 60 years for end users.[5] LBCCs can also be refurbished, adding another 15 to 20 years of use.[6]

U.S. producer *** and importer *** stated that the LBCC market was not subject to distinctive conditions of competition. However, *** added that *** had regulatory issues with its engines and was not in the market from February 2021 until mid-2023, during which time Link-Belt increased its market share. Only importer *** indicated that the market was subject to distinctive conditions of competition. Specifically, it stated that the market is subject to public investment and government policies.

Apparent U.S. consumption of LBCCs increased *** during 2022 to 2024. Overall, apparent U.S. consumption in 2024 was *** percent higher than in 2022.

[1] U.S. processor and importer Link-Belt responded to market conditions questions in both the U.S. producer's and importer's questionnaires. Unless otherwise stated, Link-Belt's responses are categorized as importer responses to limit double counting of its responses. Importer *** responded to some market conditions questions. Unless otherwise noted, staff has not included its responses in this section because it did not sell into the U.S. market.

[2] Conference transcript, p. 18 (Konkle).

[3] Conference transcript, p. 22 (Konkle).

[4] Respondent Link-Belt's postconference brief, Exhibit 1, p. 24.

[5] Conference transcript, p. 35 (Konkle).

[6] Conference transcript. P. 36 (Konkle).

Impact of section 232 and new or modified tariffs

U.S. producers and importers were asked to report the impact of section 232 tariffs and new or modified tariffs associated with executive orders since January 1, 2025 on overall demand, supply, prices, or raw material costs.[7] With respect to the section 232 tariffs, only *** reported an impact, stating that steel prices have been steadily increasing due to the section 232 tariffs, as well as increasing demand. It added that the Ukraine war in 2022 also caused disruption in the steel industry.

U.S. producer *** and *** reported that there had been an impact from the new or modified tariffs as a result of executive orders since January 1, 2025; importer *** reported that it did not know. *** reported that it expects new tariffs to substantially increase costs of LBCC raw materials and components. *** reported that its domestic suppliers have raised prices regardless of whether the suppliers will experience any actual tariffs, and that the reciprocal and additional steel and aluminum tariffs are increasing production costs, which will eventually be passed along to customers.

Channels of distribution

Firms sold mainly to distributors, with a vast majority sold to unrelated distributors, as shown in table 2.1.

Petitioner stated that it sells LBCCs mostly to distributors, which in turn sell its cranes to rental companies and end users, typically large construction contractors. Petitioner also sells directly to several "rental houses" which rent equipment including crawler cranes to construction companies. Certain distributors may also rent and sell used cranes.[8] Petitioner also stated that distributors will order LBCCs based on their forecasted needs which are informed by the distributors' interactions with rental companies and end users. It continued that purchasers generally understand their equipment needs well in advance given the significant advanced planning required for large construction projects.[9]

[7] Firms were also asked about the impact of the section 301 tariffs; *** firms reported an impact.
[8] Conference transcript, pp. 24-25 (Hull).
[9] Conference transcript, p. 25 (Hull).

Respondent Kobelco stated that it has two primary sales channels in the United States: (1) dealers that resell, rent, or rent/lease-to-buy LBCCs to end users; and (2) direct sales to end users, such as construction companies. It added that it is not affiliated with any of its customers. [10] Respondent Link-Belt stated that its North American distribution network comprises approximately 32 distributors, of which two distributors, both operating for close to 25 years, are owned by Link-Belt, and all other dealer partners remain independently owned and operated.[11]

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

Shares in percent

Source	Channel	2022	2023	2024
U.S. producer	End users	***	***	***
U.S. producer	Related distributors/dealers/rental	***	***	***
U.S. producer	Unrelated distributors/dealers/rental	***	***	***
U.S. processor	End users	***	***	***
U.S. processor	Related distributors/dealers/rental	***	***	***
U.S. processor	Unrelated distributors/dealers/rental	***	***	***
Japan	End users	***	***	***
Japan	Related distributors/dealers/rental	***	***	***
Japan	Unrelated distributors/dealers/rental	***	***	***
Nonsubject sources	End users	***	***	***
Nonsubject sources	Related distributors/dealers/rental	***	***	***
Nonsubject sources	Unrelated distributors/dealers/rental	***	***	***
All import sources	End users	***	***	***
All import sources	Related distributors/dealers/rental	***	***	***
All import sources	Unrelated distributors/dealers/rental	***	***	***

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

[10] Respondent Kobelco's postconference brief, Appendix A, p. 5.

[11] Respondent Link-Belt's postconference brief, Exhibit 1, p. 23.

Geographic distribution

U.S. producers reported selling LBCCs to all regions in the United States (table 2.2). Importers reported selling to all regions except other. U.S. producer Manitowoc estimated that *** percent of its LBCCs were shipped within 100 miles from its ***, *** percent between 101 and 1,000 miles, and *** percent over 1,000 miles.[12] Importers sold *** percent within 100 miles of their U.S. point of shipment, *** percent between 101 and 1,000 miles, and *** percent over 1,000 miles.

Table 2.2 LBCCs: Count of U.S. producer's and U.S. importers' geographic markets

Region	U.S. producer	Japan
Northeast	***	***
Midwest	***	***
Southeast	***	***
Central Southwest	***	***
Mountain	***	***
Pacific Coast	***	***
Other	***	***
All regions (except Other)	***	***
Reporting firms	1	2

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 LBCCs from the U.S. producer, U.S. processor, and Japanese producers. All supply sources showed high capacity utilization in 2024, although Japanese producers were more export-oriented than the U.S. producer.

[12] Manitowoc ***. Staff email correspondence with Myles Getlan, Counsel for Manitowoc, May 8, 2025.

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

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

Factor	Measure	U.S. producer	U.S. processor	Japan
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 (firms reporting “yes”)	Count	***	***	***

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

Note: Responding U.S. producer Manitowoc accounted for all of U.S. production of LBCCs, and U.S. processor Link-Belt accounted for all of U.S. processing of LBCCs in 2024. Responding foreign producer/exporter firms accounted for the vast majority of U.S. imports of LBCCs from Japan during 2024. 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. U.S. processor and Japanese producer capacities are not additive, as the U.S. processor is processing imported crawler assembles from Japan and domestically produced lattice booms to manufacture a finished LBCC.

Domestic production

Based on available information, U.S. producer Manitowoc has the ability to respond to changes in demand with moderate changes in the quantity of shipments of U.S.-produced LBCCs to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity or inventories and an ability to shift production to or from alternate products. Factors mitigating responsiveness of supply include limited availability of inventories and limited ability to shift shipments from alternate markets. U.S. producer Manitowoc’s practical capacity was *** from 2022 to 2024 as production increased, leading to an increase in capacity utilization. Inventories and export shipments were *** in 2024. Other products that producers reportedly can produce on the same equipment as LBCCs are rough terrain cranes, boom truck cranes, truck mounted cranes, and industrial cranes. Factors affecting U.S. producers’ ability to shift production include market conditions, including order volumes and market pricing. Manitowoc did not report any supply constraints since 2022.

Based on available information, U.S. processor Link-Belt has the ability to respond to changes in demand with small changes in the quantity of shipments of U.S.-produced LBCCs to the U.S. market. The main contributing factor to this degree of responsiveness of supply is the ability to shift production to or from alternate products. Factors mitigating responsiveness of supply include limited availability of unused capacity and inventories and limited ability to shift shipments from alternate markets. U.S. processor Link-Belt's practical capacity declined at a slower rate than production declined from 2022 to 2024, leading to a decrease in capacity utilization. Inventories declined to *** in 2024. Other products that it reportedly can produce on the same equipment as LBCCs are lattice structures for telescopic boom cranes. Link-Belt reported that the factors affecting U.S. producers' ability to shift production were that ***.

Subject imports from Japan

Based on available information, producers of LBCCs from Japan have the ability to respond to changes in demand with moderate changes in the quantity of shipments of LBCCs 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 some ability to shift production to or from alternate products. Factors mitigating responsiveness of supply include limited availability of unused capacity and inventories.

Japanese producers' production increased at a slightly faster rate than practical capacity increased, leading to an increase in capacity utilization from 2022 to 2024. Inventories increased slightly but were less than *** percent during 2022 to 2024. Approximately one-third of Japanese producers' shipments were exported to non-U.S. markets, including Western Europe, the Middle East, Oceania, Southeast Asia, South Korea, and Taiwan. Both Japanese producers reported that there are no third country trade actions on LBCCs. Other products that Japanese producer Sumitomo reportedly ***. Japanese producer Kobelco reported ***.

Imports from nonsubject sources

There were no imported LBCCs from nonsubject sources reported by questionnaire respondents during 2022 to 2024. Industry witnesses indicated that LBCCs are also produced in Germany and China.[13]

[13] Conference transcript, p. 37 (Hull), pp. 100 to 101, and pp. 126 to 127 (Collins). See also Respondent Kobelco's postconference brief, p. 9.

Supply constraints

Both importers reported that they had experienced supply constraints since January 1, 2022, while U.S. producer Manitowoc reported that it had not. Importers Kobelco and Link-Belt reported supply constraints in 2022 and 2023, but no supply constraints in 2024. Importer Kobelco stated that it stopped producing LBCCs with Hino engines in 2021 because its LBCC engine supplier, Hino, failed EPA emission standards, and that it transitioned to Isuzu motors in 2022 and 2023, returning to the U.S. market in 2024.[14] *** reported that a domestic producer of chord lugs (boom connecting pins) had financial difficulties and was unable to obtain sufficient quantities of raw material to meet *** production schedule in 2022. It added that the disruption continued into 2023, leading *** engineering team to re-design and convert to cast lugs sourced from a different domestic vendor.[15]

U.S. demand

Based on available information, the overall demand for LBCCs is likely to experience small changes in response to changes in price. The main contributing factors are the somewhat limited range of substitute products.

End uses and cost share

U.S. demand for LBCCs is driven primarily by general economic conditions and non-residential construction spending, including infrastructure spending.[16] Reported end uses include lifting and movement of materials, construction (bridge and general), and oil and gas industry. LBCCs are not used in any end-use products.

[14] Conference transcript, p. 11 (Eppard), p. 116 (Hodges). See also Respondent Kobelco's postconference brief, pp. 4 to 6, and Appendix A, p. 7. Kobelco noted ***. Id at Appendix A, p. 7.

[15] See also Respondent Link-Belt's postconference brief, pp. 16 to 17.

[16] Conference transcript, pp. 25-26 (Hull).

Business cycles

U.S. producer Manitowoc and two of three importers indicated that the market was subject to business cycles. Specifically, *** reported that the LBCCs market follows macroeconomic conditions, with non-residential construction activity and infrastructure spending as primary drivers of demand. *** reported that the oil and gas market is a strong driver in the 110-130 tonnage class machines. It added that this market has been very strong, that increased infrastructure spending has also had a favorable impact on the business cycle, and that the LBCC industry is significantly impacted by changes in interest rates.

Demand trends

Most firms reported an increase in U.S. demand for LBCCs since January 1, 2022 (table 2.4). Petitioner stated that demand for LBCCs has increased significantly since 2022 due to a relatively strong economy in recent years as well as stimulus in the form of the 2021 Infrastructure Investment and Jobs Act and the CHIPS Act.[17] Demand for LBCCs can be influenced by the replacement cycle, with most large rental companies replacing LBCCs in their fleet about every 15 years and contractors every 20 to 25 years.[18] An industry witness for the petitioner stated that the largest, peak crane market in the world was in 2006 to 2008 and cranes purchased during that period may soon be due for replacement.[19]

Table 2.4 LBCCs: Count of firms' responses regarding overall domestic and foreign demand, by firm type

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

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

[17] Conference transcript, p. 26 (Hull).

[18] Respondent Link-Belt's postconference brief, Exhibit 1, pp. 12 to 13.

[19] Petitioner postconference brief, p. 22.

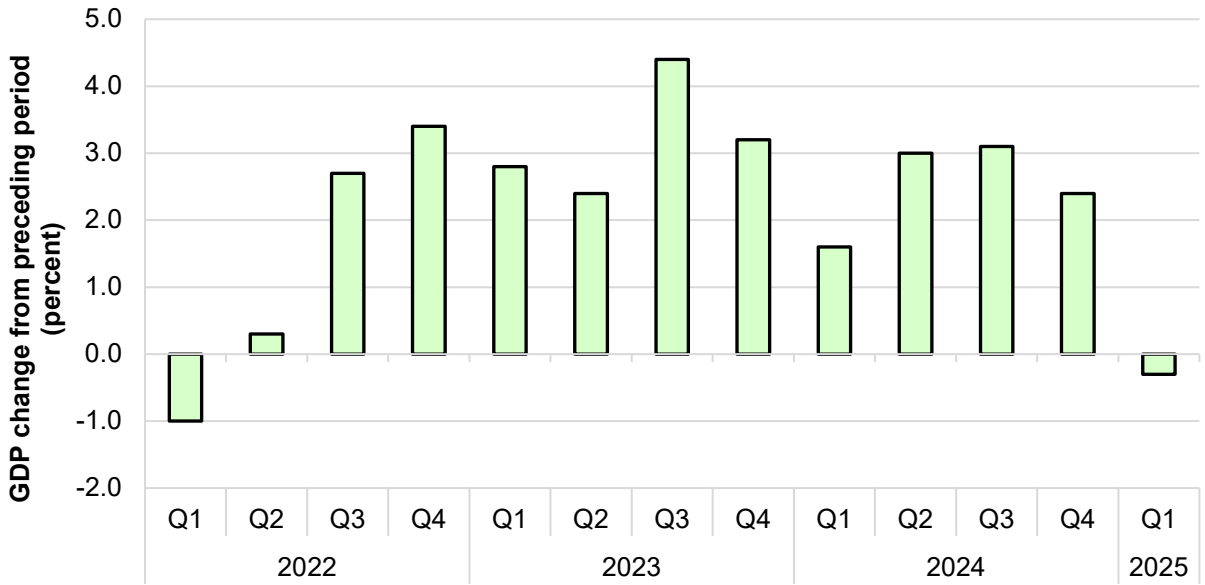
Real gross domestic product (GDP) generally increased over the period, though the first quarter of 2022 and the first quarter of 2025 declined from the previous quarter (table 2.5 and figure 2.1). Both total nonresidential construction spending and total public construction spending increased by 40.3 percent and 39.7 percent, respectively, from January 2022 to March 2025 (tables 2.6 and 2.7, figure 2.2). The rig count, a proxy for oil and gas production, increased in 2022 and the first half of 2023, then declined in the second half of 2023 through March 2025, for an overall slight decline of 1.5 percent (table 2.8 and figure 2.3).

Table 2.5 Real GDP: Percent change from preceding period, seasonally adjusted at annual rates, 2022 to 2024

Quarter	2022	2023	2024	2025
Q1	(1.0)	2.8	1.6	(0.3)
Q2	0.3	2.4	3	NA
Q3	2.7	4.4	3.1	NA
Q4	3.4	3.2	2.4	NA

Source: U.S. Bureau of Economic Analysis, "Table 1.1.1. Percent Change From Preceding Period in Real Gross Domestic Product," https://www.bea.gov/data/gdp/gross-domestic-product, accessed May 5, 2025.

Figure 2.1 Real GDP: Percent change from preceding period, seasonally adjusted at annual rates, 2022 to 2024



Source: U.S. Bureau of Economic Analysis, "Table 1.1.1. Percent Change From Preceding Period in Real Gross Domestic Product," https://www.bea.gov/data/gdp/gross-domestic-product, accessed May 5, 2025.

Table 2.6 Construction spending: Total nonresidential construction spending, monthly, seasonally adjusted, billions of dollars, January 2022 to March 2025

Month	2022	2023	2024	2025
January	888,350	1,066,812	1,206,831	1,252,896
February	905,108	1,087,027	1,208,252	1,253,424
March	912,632	1,107,380	1,211,846	1,246,592
April	937,724	1,134,962	1,213,820	NA
May	940,399	1,139,236	1,215,061	NA
June	952,471	1,147,474	1,220,340	NA
July	984,914	1,142,315	1,221,997	NA
August	990,846	1,159,850	1,227,007	NA
September	1,007,570	1,166,763	1,238,485	NA
October	1,013,855	1,182,437	1,242,391	NA
November	1,033,422	1,200,999	1,247,949	NA
December	1,052,240	1,204,109	1,251,392	NA

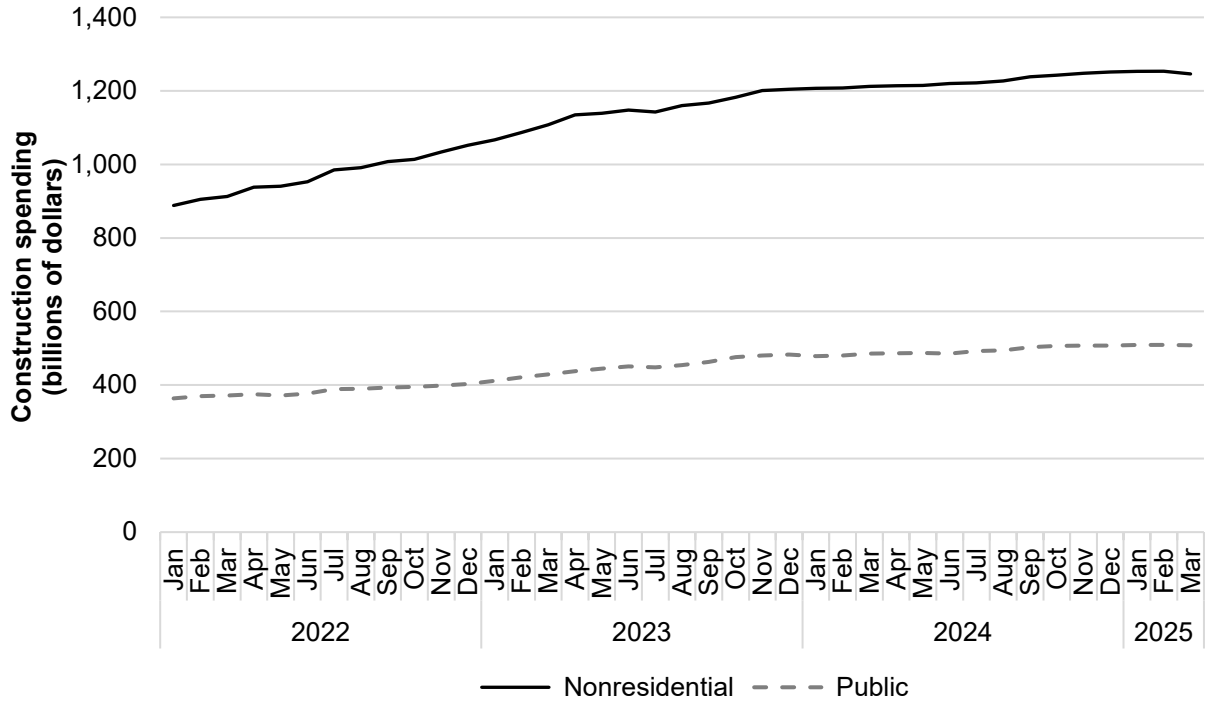
Sources: U.S. Census Bureau, Total Construction Spending: Nonresidential in the United States TLNRESCONS, retrieved from FRED, Federal Reserve Bank of St. Louis; https://fred.stlouisfed.org/series/TLNRESCONS, May 5, 2025.

Table 2.7 Construction spending: Total public construction spending, monthly, seasonally adjusted, billions of dollars, January 2022 to March 2025

Month	2022	2023	2024	2025
January	363,749	411,273	478,203	508,965
February	369,992	421,310	480,395	509,201
March	371,309	429,297	485,488	508,090
April	375,146	437,776	486,849	NA
May	371,762	444,607	487,104	NA
June	376,389	450,969	485,921	NA
July	389,187	447,772	492,691	NA
August	389,811	454,126	494,540	NA
September	393,057	462,829	502,947	NA
October	394,667	476,064	506,694	NA
November	398,105	479,940	507,220	NA
December	403,063	482,887	506,928	NA

Sources: U.S. Census Bureau, Total Public Construction Spending: Total Construction in the United States TLPBLCONS, retrieved from FRED, Federal Reserve Bank of St. Louis; https://fred.stlouisfed.org/series/TLPBLCONS, May 5, 2025.

Figure 2.2 Construction spending: Total nonresidential and public construction spending, monthly, seasonally adjusted, billions of dollars, January 2022 to March 2025



Sources: U.S. Census Bureau, Total Construction Spending: Nonresidential in the United States TLNRESCONS, retrieved from FRED, Federal Reserve Bank of St. Louis; https://fred.stlouisfed.org/series/TLNRESCONS, May 5, 2025. U.S. Census Bureau, Total Public Construction Spending: Total Construction in the United States TLPBLCONS, retrieved from FRED, Federal Reserve Bank of St. Louis; https://fred.stlouisfed.org/series/TLPBLCONS, May 5, 2025.

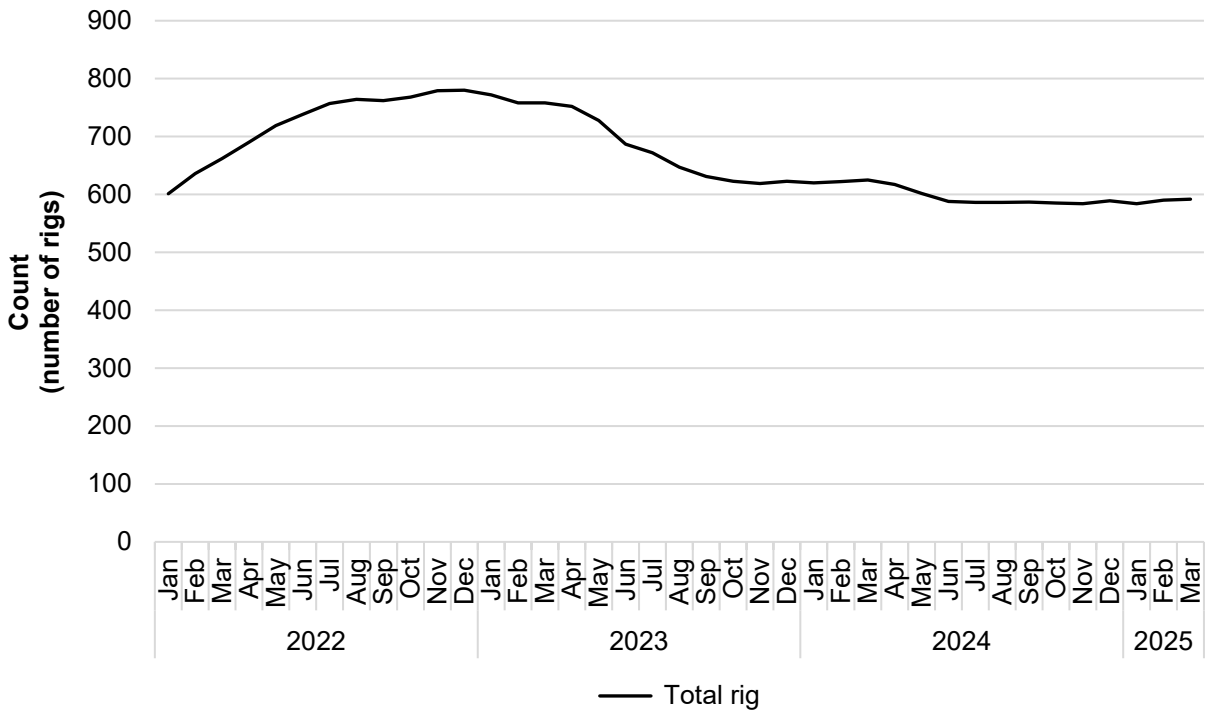
Table 2.8 Rig count: Baker Hughes North America Rig Count, average monthly, January 2022 to March 2025

Month	2022	2023	2024	2025
January	601	772	620	584
February	636	758	622	590
March	662	758	625	592
April	690	752	617	NA
May	719	728	602	NA
June	738	687	588	NA
July	757	672	586	NA
August	764	647	586	NA
September	762	631	587	NA
October	768	623	585	NA
November	779	619	584	NA
December	780	623	589	NA

Source: Baker Hughes North America Rig Count, https://rigcount.bakerhughes.com/na-rig-count, accessed May 7, 2025.

Note: Staff calculated the monthly average rig count from the weekly rig count data available.

Figure 2.3 Rig count: Baker Hughes North America Rig Count, average monthly, January 2022 to March 2025



Source: Baker Hughes North America Rig Count, https://rigcount.bakerhughes.com/na-rig-count, accessed May 7, 2025.

Note: Staff calculated the monthly average rig count from the weekly rig count data available.

Substitute products

Substitutes for LBCCs are limited. *** reported that there were no substitutes while *** reported that there are substitutes. Reported substitutes include telescopic crawlers or rough terrain cranes for bridge construction, telescopic boom crawler cranes for construction, and hydraulic truck cranes or rough terrain cranes for the oil and gas industry. Importer *** stated that customers typically buy LBCCs for their intended use, so the price of the substitutes does not impact the price of LBCCs.

Substitutability issues

This section assesses the degree to which U.S.-produced LBCCs and imports of LBCCs from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of LBCCs from domestic and imported sources based on those factors. Based on available data, staff believes that there is a moderate-to-high degree of substitutability between domestically produced LBCCs and LBCCs imported from subject sources.[20] U.S. producer Manitowoc reported exclusively producing its LBCCs to order. It also indicated that LBCCs are interchangeable no matter the source and that there are never significant factors other than price. On the other hand, importers reported selling exclusively from inventory. They also reported that LBCCs are sometimes interchangeable and that there are always significant factors other than price. Industry witnesses testified to the importance of reliability and after-sale technical support to customers.[21]

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

[21] Conference transcript, p. 33 and pp. 38 to 39 (Poff); p. 122 (Schultz); and pp. 115 to 116 (Hodges).

Factors affecting purchasing decisions

Most important purchase factors

Purchasers responding to lost sales lost revenue allegations[22] were asked to identify the main purchasing factors their firm considered in their purchasing decisions for LBCCs. Purchaser *** reported price, availability, and support as its top three purchasing factors and purchaser *** reported "assigned territory based on dealer agreement." Industry representatives noted that customers in local regions know who their distributor is and every distributor in their own territory knows who their other competing distributors are.[23]

Lead times

Domestically produced LBCCs are primarily produced-to-order while LBCCs imported from Japan are primarily sold from inventory. U.S. producer Manitowoc reported that *** percent of their commercial shipments were produced-to-order, with lead times averaging *** days. The remaining *** percent of their commercial shipments came from inventories, with lead times averaging *** days.[24] Importers reported that they sold *** percent of their LBCCs imported from Japan from foreign inventory and *** percent from U.S. inventories, with lead times of *** days and *** days, respectively.

Link-Belt stated that it maintains a build schedule that is synchronized with the delivery of Sumitomo-supplied boom attachments, so that domestic subassembly work and inbound logistics for the attachment align around the same target completion date. Lead-time variability is driven primarily by the specific attachment required; simpler attachments may arrive more quickly, while complex or custom attachments can extend the schedule. In practice, the interval from order placement to receipt of a fully assembled, tested lattice-boom crawler crane is approximately six months, which includes the time required for attachment fabrication in Japan, ocean freight transit, customs clearance, inland transport to Lexington, and the domestic processes needed to complete final assembly and quality inspection.[25]

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

[23] Conference transcript, p. 173 (Collins and Hodges).

[24] ***.

[25] Respondent Link-Belt's postconference brief, exhibit 1, p. 2.

Comparison of U.S.-produced and imported LBCCs

In order to determine whether U.S.-produced LBCCs can generally be used in the same applications as imports from Japan, U.S. producers and importers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables 2.9, Manitowoc reported that domestically produced LBCCs and LBCCs imported from all sources are *** interchangeable while both importers of LBCCs from Japan reported that they are *** interchangeable.[26] Importer *** reported that there are different safety standards across the world. Importer *** reported that the design of its products has focused on lower cost of transportation and minimizing the number of loads that must be transported. It continued that the United States has a multitude of road regulations with different DOT regulations in each state, and its LBCCs deliver superior mobilization and demobilization features which aid in transporting its LBCCs.

Table 2.9 LBCCs: Count of U.S. producers and importers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Firm type	Always	Frequently	Sometimes	Never
U.S. vs. Japan	Producer	***	***	***	***
U.S. vs. other	Producer	***	***	***	***
Japan vs. Other	Producer	***	***	***	***
U.S. vs. Japan	Importer	***	***	***	***
U.S. vs. other	Importer	***	***	***	***
Japan vs. Other	Importer	***	***	***	***

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

[26] Importer *** reported that domestically produced LBCCs and imported LBCCs are sometimes interchangeable due to "lift carts and/or crane features."

In addition, U.S. producers and importers were asked to assess how often differences other than price were significant in sales of LBCCs from the United States, Japan, or nonsubject countries. As seen in table 2.10, Manitowoc reported that there are *** significant factors other than price between domestically produced LBCCs and LBCCs imported from all sources while *** importers reported that they are *** significant factors.[27] Importer *** reported that after sales-service like parts supply is very important, as is ease of maintenance and less LBCC downtime. It added that Japanese quality is higher than that of any other country. Importer *** reported that the competitive environment is based on product quality, service and support and customized product offerings. It continued that customers often assess competing products not only by considering up-front cost, but also total cost (including maintenance) during the life of the LBCC.

Table 2.10 LBCCs: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

Country pair	Firm type	Always	Frequently	Sometimes	Never
U.S. vs. Japan	Producer	***	***	***	***
U.S. vs. other	Producer	***	***	***	***
Japan vs. Other	Producer	***	***	***	***
U.S. vs. Japan	Importer	***	***	***	***
U.S. vs. other	Importer	***	***	***	***
Japan vs. Other	Importer	***	***	***	***

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

[27] Importer *** reported that there are always significant factors other than price between domestically produced LBCCs and imported LBCCs, including service/parts/support, expertise, warranty, and durability.

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 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 two firms that accounted for virtually all U.S. production of LBCCs during 2024.

U.S. producers and U.S. processors

The Commission issued a U.S. producer questionnaire to all known firms based on information contained in the petition, and through staff research. Two firms provided usable data on their operations. Table 3.1 lists the U.S. producer and U.S. processor of LBCCs, their production locations, positions on the petition, and shares of total production.

Table 3.1 LBCCs: U.S. producer Manitowoc's and U.S. processor Link-Belt's position on the petition, location of production, and share of reported production / processing, 2024

Shares in percent

Firm	Position on petition	Production location(s)	Share of production	Share of processing / assembly
Link-Belt	***	Lexington, KY	—	100.0
Manitowoc	Petitioner	Shady Grove, PA Port Washington, WI	100.0	—
All firms	Various	Various	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 "—".

Table 3.2 presents information on the U.S. producer's and U.S. processor's ownership, related and/or affiliated firms.

Table 3.2 LBCCs: U.S. producer Manitowoc's and U.S. processor Link-Belt's ownership, related and/or affiliated firms

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

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

As indicated in table 3.2, the U.S. processor is related to foreign producers of the subject merchandise and the U.S. processor is related to U.S. importers of the subject merchandise.[1]

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of LBCCs since 2024. *** producers or processors indicated in their questionnaires that they had experienced such changes.

[1] *See* Transcript of Preliminary Staff Conference, EDIS Doc. 850632 (May 1, 2025) 161 (Shultz).

U.S. producer's and U.S. processor's, capacity, and capacity utilization

Table 3.3 presents U.S. producer Manitowoc's installed and practical capacity and production on the same equipment. From 2022 to 2024, installed overall capacity ***. Practical overall capacity *** from 2022 to 2024. Practical overall production increased by *** percent from 2022 to 2023, and increased by *** percent from 2023 to 2024, for an overall increase of *** percent between 2022 and 2024. Both installed and practical overall capacity utilization increased from 2022 to 2024 by *** percentage points and *** percentage points, respectively.[2]

Table 3.3 LBCCs: U.S. producer Manitowoc's installed and practical capacity, production, and utilization on the same equipment as subject production, by period[3]

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 LBCC	Capacity	***	***	***
Practical LBCC	Production	***	***	***
Practical LBCC	Utilization	***	***	***

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

[2] In addition to LBCCs, Manitowoc produces *** on the same equipment as subject production.

[3] U.S. processor Link-Belt did not provide questionnaire data regarding installed overall capacity, practical overall capacity, or production of other products.

Table 3.4 presents U.S. producer Manitowoc and U.S. processor Link-Belt's reported narratives regarding practical capacity constraints.

Table 3.4 LBCCs: U.S. producer Manitowoc's and U.S. processor Link-Belt's reported capacity constraints since January 1, 2022

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

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

Table 3.5 presents U.S. producer Manitowoc and U.S. processor Link-Belt's narratives on their domestic activities.

Table 3.5 LBCCs: U.S. producer Manitowoc's and U.S. processor Link-Belt's narratives on their domestic activities

Item	Firm name and narrative response
Link-Belt	***
Manitowoc	***

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

Table 3.6 presents U.S. producer Manitowoc and U.S. processor Link-Belt's share of value inputs in 2024.

Table 3.6 LBCCs: U.S. producer Manitowoc's and U.S. processor Link-Belt's share of value of inputs in 2024

Capacity and production in units; utilization in percent

Production/processing input type	U.S. producer Manitowoc	Sourcing	U.S. processor Link-Belt	Sourcing
Lattice boom assembly	***	Internally produce	***	Internally produce
Hoisting assembly	***	Internally produce	***	Import
Lower carriage assembly	***	Internally produce	***	Import
Crawler assembly	***	Internally produce	***	Import
Upper carriage assembly	***	Internally produce	***	Import
All other inputs to a complete LBCC	***	Internally produce	***	Import
All inputs	100.0	Internally produce	100.0	Various

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

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

Table 3.7 presents U.S. producer Manitowoc's and U.S. processor Link-Belt's estimated unit value of lattice boom assemblies versus all other assemblies in an average finished unit, based on 2024 data.

Table 3.7 LBCCs: U.S. producer Manitowoc's and U.S. processor Link-Belt's estimated unit value of lattice boom assemblies versus all other assemblies in an average finished unit, based on 2024 data

Average unit value (AUV) in 1,000 dollars per unit; percent lower/(higher) in percent

Production/processing input type	U.S. producer Manitowoc AUV	U.S. processor Link-Belt AUV	Percent processor lower / (higher)
Lattice boom assemblies	***	***	***
All other subassemblies	***	***	***

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

Table 3.8 presents U.S. producer Manitowoc and U.S. processor Link-Belt's rating and narratives on the complexity and importance of operations.

Table 3.8 LBCCs: U.S. producer Manitowoc's and U.S. processor Link-Belt's reported complexity and importance of operations

Ratings of 1 are minimally complex, intense, or important; Ratings of 5 are extremely complex, intense, or important

Firm	Rating	Narrative response on complexity and importance rating
Link-Belt	***	***
Manitowoc	***	***

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

Table 3.9 presents U.S. producer Manitowoc's and U.S. processor Link-Belt's reported domestic operations, by factor.

Table 3.9 LBCCs: U.S. producer Manitowoc's and U.S. processor Link-Belt's reported domestic operations, by factor

Value in 1,000 dollars; value added in percent; employment in average number of PRWs

Factor	Link-Belt (processor)	Manitowoc (producer)
Capital investments: Greenfield	*** million	*** million
Capital investments: Assets	*** million	*** million
Capital investments: Capital expenditures	*** million	*** million
Technical expertise: R & D expenses	*** thousand	*** thousand
Value added	*** percent	*** percent
Employment	*** PRWs	*** PRWs
Quantity, type, and source of parts	Domestic: *** percent, Imported *** percent	Domestic: *** percent, Imported *** percent

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

Table 3.10 presents U.S. producer Manitowoc's and U.S. processor Link-Belt's narratives on their domestic activities, by item.

Table 3.10 LBCCs: U.S. producer Manitowoc's and U.S. processor Link-Belt's narratives on their domestic activities, by item

Item	Firm name and narrative response
Capital investments	***
Capital investments	***
Technical expertise	***
Technical expertise	***
Value added	***
Value added	***
Employment	***
Employment	***
Quantity, type, and source of parts	***
Quantity, type, and source of parts	***
Costs and activities	***
Costs and activities	***

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

Table 3.11 and figure 3.1 present U.S. producer Manitowoc's LBCC capacity, production, and capacity utilization. Practical LBCCs capacity *** from 2022 to 2024. Practical LBCCs production increased by *** percent from 2022 to 2024. Capacity utilization increased by *** percentage points from 2022 to 2024.

Table 3.11 LBCCs: U.S. producer Manitowoc's practical capacity, production, and capacity utilization, by period

Capacity and production in units; capacity utilization in percent

Firm	2022	2023	2024
Practical capacity	***	***	***
Production	***	***	***
Capacity utilization	***	***	***

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

Figure 3.1 LBCCs: U.S. producer Manitowoc's practical capacity, production, and capacity utilization, by period

* * * * * * *

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

Table 3.12 and figure 3.2 present U.S. processor Link-Belt's LBCC capacity, processing, and capacity utilization. Practical LBCC capacity decreased by *** percent from 2022 to 2023 before increasing by *** percent from 2023 to 2024, for an overall decrease of *** percent from 2022 to 2024**.** Practical LBCCs processing decreased by *** percent from 2022 to 2023 before increasing by *** percent from 2023 to 2024 for an overall decrease of *** percent. Capacity utilization decreased by *** percentage points from 2022 to 2024.

Table 3.12 LBCCs: U.S. processor Link-Belt's practical capacity, processing, and capacity utilization, by period

Capacity and production in units; capacity utilization in percent

Firm	2022	2023	2024
Practical capacity	***	***	***
Processing	***	***	***
Capacity utilization	***	***	***

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

Note: Processing is when a firm purchases or otherwise procures in-scope LBCCs from another entity (i.e., either domestically manufactured or imported LBCCs subassemblies) in whole or in part, and conducts further processing of and/or assembly in the United States. The firm may or may not also produce one or more (but not all) LBCC subassemblies domestically using raw materials.

Figure 3.2 LBCCs: U.S. processor Link-Belt's practical capacity, processing, and capacity utilization, by period

* * * * * * *

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

Alternative products

As shown in table 3.13, LBCCs accounted for the smallest share of total production by U.S. producer Manitowoc ranging between *** percent from 2022 to 2024.

Table 3.13 LBCCs: U.S. producer Manitowoc's overall production on the same equipment as in-scope production, by product type and period

Quantity in units; share in percent

Product type	Measure	2022	2023	2024
LBCCs	Quantity	***	***	***
Other products	Quantity	***	***	***
All products	Quantity	***	***	***
LBCCs	Share	***	***	***
Other products	Share	***	***	***
All products	Share	100.0	100.0	100.0

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

U.S. producer's and U.S. processor's U.S. shipments and exports

Table 3.14 presents the U.S. producer's U.S. shipments, export shipments, and total shipments. The U.S. producer's U.S. shipments, by quantity, increased by *** percent from 2022 to 2023 and increased by *** percent from 2023 to 2024, for an overall increase of *** percent between 2022 and 2024. The U.S. producer's U.S. shipments, by value, increased by *** percent from 2022 to 2023 and increased by *** percent from 2023 to 2024, for an overall increase of *** percent between 2022 and 2024. The average unit value of U.S. shipments decreased yearly from 2022 to 2024, ending *** percent lower in the same period.

By quantity, export shipments accounted for a small share of U.S. producer's total shipments in 2023 and 2024, and none were reported in 2022. Export shipments quantity and value decreased by *** percent, respectively from 2023 to 2024. The unit value of export shipments decreased by *** percent from 2023 to 2024.

Table 3.14 LBCCs: U.S. producer Manitowoc's total shipments, by destination and period

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

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

Table 3.15 presents the U.S. processor's U.S. shipments, export shipments, and total shipments. The U.S. processor's U.S. shipments, by quantity, decreased by *** percent from 2022 to 2023 and increased by *** percent from 2023 to 2024, for an overall decrease of *** percent between 2022 and 2024. The U.S. processor's U.S. shipments, by value, decreased by *** percent from 2022 to 2023 and by *** percent from 2023 to 2024, for an overall increase of *** percent between 2022 and 2024. The unit value of their U.S. shipments steadily rose from 2022 to 2024, increasing by *** percent from 2022 to 2023 and increased by *** percent from 2023 to 2024, ending *** percent higher overall.

By quantity, export shipments accounted for *** share of the U.S. processor's total shipments from 2022 to 2024. The unit value of its U.S. shipments steadily rose from 2022 to 2024, increasing by *** percent from 2022 to 2023 by *** percent from 2023 to 2024, ending *** percent higher overall.

Table 3.15 LBCCs: U.S. processor Link-Belt's total shipments, by destination and period

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

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

Table 3.16 presents the U.S. producer's U.S. shipments, by type and period. The U.S. producer's commercial U.S. shipments, by quantity, increased by *** percent from 2022 to 2023 and increased by *** percent from 2023 to 2024, for an overall increase of *** percent between 2022 and 2024. The U.S. producer's commercial U.S. shipments, by value, increased by *** percent from 2022 to 2023 and increased by *** percent from 2023 to 2024, for an overall increase of *** percent between 2022 and 2024. The U.S. producer's transfers to related firms, by quantity, increased by *** percent from 2022 to 2023 and was unchanged from 2023 to 2024, for an overall increase of *** percent between 2022 and 2024. The U.S. producer's transfers to related firms, by value, increased by *** percent from 2022 to 2023 and decreased by *** percent from 2023 to 2024, for an overall decrease of *** percent between 2022 and 2024.

The average unit value of the U.S. producer's U.S. commercial shipments decreased by *** percent from 2022 to 2023 and increased by *** percent from 2023 to 2024, for an overall decrease of *** percent between 2022 and 2024. Average unit value of transfers to related firms saw the most significant decrease in unit value from 2023 to 2024, increasing by *** percent from 2022 to 2023 and decreasing by *** percent from 2023 to 2024, for an overall decrease of *** percent.

Table 3.16 LBCCs: U.S. producer Manitowoc's U.S. shipments, by type and period

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

Item	Measure	2022	2023	2024
Commercial U.S. shipments	Quantity	***	***	***
Transfers to related firms	Quantity	***	***	***
U.S. shipments	Quantity	***	***	***
Commercial U.S. shipments	Value	***	***	***
Transfers to related firms	Value	***	***	***
U.S. shipments	Value	***	***	***
Commercial U.S. shipments	Unit value	***	***	***
Transfers to related firms	Unit value	***	***	***
U.S. shipments	Unit value	***	***	***
Commercial U.S. shipments	Share of quantity	***	***	***
Transfers to related firms	Share of quantity	***	***	***
U.S. shipments	Share of quantity	100.0	100.0	100.0
Commercial U.S. shipments	Share of value	***	***	***
Transfers to related firms	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 3.17 presents the U.S. processor's U.S. shipments, by type and period. The U.S. processor's commercial U.S. shipments, by quantity, decreased *** percent from 2022 to 2023 and increased *** percent from 2023 to 2024, for an overall decrease of *** percent between 2022 and 2024. The U.S. processor's commercial U.S. shipments, by value, decreased by *** percent from 2022 to 2023 and increased *** percent from 2023 to 2024, for an overall increase of *** percent between 2022 and 2024. The U.S. processor's transfers to related firms, by quantity, decreased by *** percent from 2022 to 2023 and increased by *** percent from 2023 to 2024, for an overall increase of *** percent between 2022 and 2024. The U.S. processor's transfers to related firms, by value, decreased by *** percent from 2022 to 2023 and increased by *** percent from 2023 to 2024, for an overall increase of *** percent between 2022 and 2024.

The average unit value of the U.S. processor's commercial U.S. shipments increased by *** percent from 2022 to 2023 and *** percent from 2023 to 2024, for an overall increase of *** percent between 2022 and 2024. Unit value of transfers to related firms saw the most significant increase in unit value from 2023 to 2024, decreasing by *** percent from 2022 to 2023 and increasing by *** percent in 2024, for an overall increase of *** percent.

Table 3.17 LBCCs: U.S. processor Link-Belt's U.S. shipments, by type and period

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

Item	Measure	2022	2023	2024
Commercial U.S. shipments	Quantity	***	***	***
Transfers to related firms	Quantity	***	***	***
U.S. shipments	Quantity	***	***	***
Commercial U.S. shipments	Value	***	***	***
Transfers to related firms	Value	***	***	***
U.S. shipments	Value	***	***	***
Commercial U.S. shipments	Unit value	***	***	***
Transfers to related firms	Unit value	***	***	***
U.S. shipments	Unit value	***	***	***
Commercial U.S. shipments	Share of quantity	***	***	***
Transfers to related firms	Share of quantity	***	***	***
U.S. shipments	Share of quantity	100.0	100.0	100.0
Commercial U.S. shipments	Share of value	***	***	***
Transfers to related firms	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 3.18 presents the U.S. producer's and processor's U.S. shipments for use in apparent consumption, by period. The U.S. producer's shipments for use in apparent consumption, by value, increased by *** percent from 2022 to 2023 and increased by *** percent from 2023 to 2024, for an overall increase of *** percent between 2022 and 2024. The U.S. processor's shipments for use in apparent consumption, by value added to imports, decreased by *** percent from 2022 to 2023 and increased by *** percent from 2023 to 2024, for an overall increase of *** percent between 2022 and 2024. Total value added to imports increased by *** percent from 2022 to 2023 and increased by *** percent from 2023 to 2024, for an overall increase of *** percent between 2022 and 2024.

Table 3.18 LBCCs: U.S. producer Manitowoc's and U.S. processor Link-Belt's U.S. shipments, for use in apparent consumption, by period

Quantity in units; value in 1,000 dollars

Item	Measure	2022	2023	2024
U.S. producer	Quantity	***	***	***
U.S. producer	Value	***	***	***
U.S. processor: Value added to domestic	Value	***	***	***
U.S. producer and processor: Fully domestic	Value	***	***	***
U.S. processor: Valued added to imports	Value	***	***	***
U.S. producer and processor: Total	Value	***	***	***

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

Note: Quantity for U.S. shipments reflect only producers' U.S. shipment quantities. Value for U.S. shipments reflect LBCCs sold in the United States from domestically manufactured LBCCs (including the value added by U.S. processors to domestic LBCCs, as well as the incremental value added by U.S. processors to imported LBCCs products. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported as an import. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Table 3.19 presents the U.S. producer's U.S. shipments in 2024, by product type.

Table 3.19 LBCCs: U.S. producer Manitowoc's U.S. shipments in 2024, by product type

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

Product type	Quantity	Value	Unit value	Share of quantity	Share of value
70 to 250 ST max load capacity	***	***	***	***	***
251 to 500 ST max load capacity	***	***	***	***	***
501 to 750 ST max load capacity	***	***	***	***	***
All other max load capacities	***	***	***	***	***
All complete units	***	***	***	***	***
Carriage-related subassemblies	***	***	***	***	***
All other subassemblies	***	***	***	***	***
All subassemblies	***	***	***	***	***
All in-scope LBCCs	***	***	***	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 "—". See appendix E for additional data by product type across the period of investigation.

Table 3.20 presents the U.S. processor's U.S. shipments in 2024, by product type.

Table 3.20 LBCCs: U.S. processor Link-Belt's U.S. shipments in 2024, by product type

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

Product type	Quantity	Value	Unit value	Share of quantity	Share of value
70 to 250 ST max load capacity	***	***	***	***	***
251 to 500 ST max load capacity	***	***	***	***	***
501 to 750 ST max load capacity	***	***	***	***	***
All other max load capacities	***	***	***	***	***
All complete units	***	***	***	***	***
Carriage-related subassemblies	***	***	***	***	***
All other subassemblies	***	***	***	***	***
All subassemblies	***	***	***	***	***
All in-scope LBCCs	***	***	***	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 "—". See appendix E for additional data by product type across the period of investigation.

U.S. producer's and U.S. processor's inventories

Table 3.21 presents the U.S. producer's inventories and their ratio to select items, by period. The U.S. producer's end-of-period inventory, by quantity, decreased by *** percent from 2022 to 2023 and *** from 2023 to 2024, for an overall decrease of *** percent between 2022 and 2024.

Table 3.21 LBCCs: U.S. producer Manitowoc's inventories and their ratio to select items, by period

Quantity in units; ratios 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.

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

Table 3.22 presents the U.S. processor's inventories and their ratio to select items, by period. The U.S. processor's end-of-period inventory, by quantity, decreased by *** percent from 2022 to 2023 and increased by *** percent from 2023 to 2024, for an overall decrease of *** percent between 2022 and 2024.

Table 3.22 LBCCs: U.S. producer Manitowoc's inventories and their ratio to select items, by period

Quantity in units; ratios 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.

U.S. processor's imports from subject source[4]

Information about the U.S. processor's imports of subassemblies from the subject source are presented in tables 3.23 and 3.24. The U.S. processor reported U.S. processing, by quantity, decreased *** percent from 2022 to 2023 and increased *** percent from 2023 to 2024, for an overall decrease of *** percent between 2022 and 2024. The U.S. processor's imports from Japan, by quantity, increased by *** percent from 2022 to 2023 and decreased *** percent from 2023 to 2024, for an overall decrease of *** percent between 2022 and 2024.

Table 3.23 LBCCs: U.S. processor Link-Belt's U.S. processing, U.S. imports from Japan, and ratio to processing, by period

Quantity in units; ratios in percent

Item	Measure	2022	2023	2024
U.S. processing	Quantity	***	***	***
Imports from Japan	Quantity	***	***	***
Imports from Japan to U.S. processing	Ratio	***	***	***

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

Table 3.24 LBCCs: U.S. processor Link-Belt's reason for imports

Item	Narrative response on reasons for importing
Link-Belt's reason for importing	***

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

[4] The U.S. producer reported no purchases of LBCCs from 2022 to 2024.

U.S. employment, wages, and productivity

Table 3.25 shows the U.S. producer's employment-related data. The number of production and related workers ("PRWs") reported by the U.S. producer increased by *** percent from 2022 to 2023 and increased by *** percent from 2023 to 2024, for an overall increase of *** percent from 2022 to 2024. Total hours worked increased by *** percent from 2022 to 2023 and increased by *** percent from 2023 to 2024 for an overall increase of *** percent from 2022 to 2024. Total hours worked per PRW increased by *** percent from 2022 to 2023 and increased by *** percent from 2023 to 2024 for an overall increase of *** percent from 2022 to 2024. From 2022 to 2023, hourly wages *** by *** percent and from 2023 to 2024 increased by *** percent for an overall increase between 2022 and 2024 of *** percent. Productivity increased by *** percent from 2022 to 2023, and increased by *** percent from 2023 to 2024, for an overall increase of *** percent. Unit labor costs decreased by *** percent from 2022 to 2023, and decreased by *** percent from 2023 to 2024, for an overall decrease of *** percent.

Table 3.25 LBCCs: U.S. producer Manitowoc's employment related information, by item and 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 million hours)	***	***	***
Unit labor costs (1,000 dollars per unit)	***	***	***

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

Table 3.26 shows the U.S. processor's employment-related data. The number of processing and related workers ("PRWs") reported by the U.S. processor was unchanged from *** in 2022 to *** in 2024. Total hours worked and wages paid were unchanged from *** in 2022 to *** in 2024. Total hours worked per PRW was unchanged from *** in 2022 to *** in 2024. During the same period, hourly wages *** by *** percent. Productivity decreased by *** percent from 2022 to 2023, and increased by *** percent from 2023 to 2024, for an overall decrease of *** percent. Unit labor costs increased by *** percent from 2022 to 2023, and decreased by *** percent from 2023 to 2024, for an overall increase of *** percent.

Table 3.26 LBCCs: U.S. processor Link-Belt's employment related information, by item and 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 million hours)	***	***	***
Unit labor costs (1,000 dollars per unit)	***	***	***

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

Table 3.27 shows the U.S. producer's and U.S. processor's combined employment-related information, by item and period. Employment related measures for U.S. producer Manitowoc combined with U.S. processor Link-Belt were *** in 2024 than in 2022.

Table 3.27 LBCCs: U.S. producer Manitowoc's and U.S. processor Link-Belt's employment related information, by item and 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)	***	***	***

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 two firms believed to be importers of subject LBCCs, as well as to all U.S. producers of LBCCs.[1] Usable questionnaire responses were received from two companies, representing all of U.S. imports from Japan in 2024 under HTS subheadings 8426.49.0010 and 8426.49.0090, "basket" categories. Table 4.1 lists all responding U.S. importers of LBCCs from Japan and other sources, their locations, and their shares of U.S. imports, in 2024.[2]

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

Shares in percent

Firm	Headquarters	Japan	Nonsubject sources	All import sources
Kobelco	Katy, TX	***	***	***
Link-Belt	Lexington, KY	***	***	***
Tadano	Houston, TX	***	***	***
All firms	Various	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.[3]

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

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

[2] Importer *** reported *** U.S. shipments because their total of *** units over the period of investigation that were either *** or ***.

[3] Nonsubject importers from Germany/Austria (Liebherr) and China (Sany) did not provide a completed USITC U.S. importers' questionnaire response. Petitioner's post-conference brief, p. 2.

U.S. imports

Table 4.2 and figure 4.1 presents data for U.S. imports of LBCCs from Japan and all other sources. Subject imports increased by *** percent by quantity from 2022 to 2024. Subject imports increased by *** percent by value from 2022 to 2024 and accounted for at least *** percent by quantity and at least *** percent by value of all imports during 2022 to 2024. The unit value of subject imports increased by *** percent from 2022 to 2023, and *** percent from 2023 to 2024, with an overall increase of *** percent between 2022 and 2024.[4]

Table 4.2 LBCCs: U.S. imports, by source and period

Quantity in units; value in 1,000 dollars; unit values in 1,000 dollars per unit; share and ratio in percent; ratio represents the ratio to U.S. production

Source	Measure	2022	2023	2024
Japan	Quantity	***	***	***
Nonsubject sources	Quantity	***	***	***
All import sources	Quantity	***	***	***
Japan	Value	***	***	***
Nonsubject sources	Value	***	***	***
All import sources	Value	***	***	***
Japan	Unit value	***	***	***
Nonsubject sources	Unit value	***	***	***
All import sources	Unit value	***	***	***
Japan	Share of quantity	***	***	***
Nonsubject sources	Share of quantity	***	***	***
All import sources	Share of quantity	***	***	***
Japan	Share of value	***	***	***
Nonsubject sources	Share of value	***	***	***
All import sources	Share of value	***	***	***
Japan	Ratio	***	***	***
Nonsubject sources	Ratio	***	***	***
All import sources	Ratio	***	***	***

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

Note: Only one U.S. importer *** submitted a questionnaire response with nonsubject import data, none of which were consumed in the United States. These import volumes are shown above in this table. The petitioner estimates, however, that they are additional volumes of nonsubject import not captured in Commission questionnaire responses for import from Germany and China. The petitioner and all respondent parties relied on the petitioners estimated nonsubject import volumes, which are shown in table 4.4.

[4] The quantity of subject imports includes data from the U.S. processor, which imported *** units from Japan in 2024.

Figure 4.1 LBCCs: 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 LBCCs: Changes in U.S. imports, by source and period

Changes (Δ) in percent (%) or percentage point (ppt)

Source	Measure	2022 to 2024	2022 to 2023	2023 to 2024
Japan	%Δ Quantity	▲***	▲***	▲***
Nonsubject sources	%Δ Quantity	▲***	***	▲***
All import sources	%Δ Quantity	▲***	▲***	▲***
Japan	%Δ Value	▲***	▲***	▲***
Nonsubject sources	%Δ Value	▲***	▲***	▲***
All import sources	%Δ Value	▲***	▲***	▲***
Japan	%Δ Unit value	▲***	▲***	▲***
Nonsubject sources	%Δ Unit value	***	▲***	▼***
All import sources	%Δ Unit value	▲***	▲***	▲***
Japan	ppt Δ Quantity	▼***	▲***	▼***
Nonsubject sources	ppt Δ Quantity	▲***	▼***	▲***
All import sources	ppt Δ Quantity	***	***	***
Japan	ppt Δ Value	▲***	▲***	▼***
Nonsubject sources	ppt Δ Value	▼***	▼***	▲***
All import sources	ppt Δ Value	***	***	***
Japan	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: 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.

Table 4.4 presents data for nonsubject U.S. imports, by period.

Table 4.4 LBCCs: Estimated nonsubject U.S. imports, by period

Quantity in units

Source	Measure	2022	2023	2024
Estimated nonsubject import volumes	Quantity	***	***	***

Source: Petitioner's postconference brief, p. 27 and Kobelco's postconference brief, exh. 1.

Table 4.5 and 4.6 present data for U.S. importers' U.S. imports by product type.

Table 4.5 LBCCs: U.S. importers' U.S. imports from Japan in 2024, by product type

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

Product type	Quantity	Value	Unit value	Share of quantity	Share of value
70 to 250 ST max load capacity	***	***	***	***	***
251 to 500 ST max load capacity	***	***	***	***	***
501 to 750 ST max load capacity	***	***	***	***	***
All other max load capacities	***	***	***	***	***
All complete units	***	***	***	***	***
Carriage-related subassemblies	***	***	***	***	***
All other subassemblies	***	***	***	***	***
All subassemblies	***	***	***	***	***
All in-scope LBCCs	***	***	***	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 "—". See appendix E for additional data by product type across the period of investigation.

Table 4.6 LBCCs: U.S. importers' U.S. imports from nonsubject sources in 2024, by product type

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

Product type	Quantity	Value	Unit value	Share of quantity	Share of value
70 to 250 ST max load capacity	***	***	***	***	***
251 to 500 ST max load capacity	***	***	***	***	***
501 to 750 ST max load capacity	***	***	***	***	***
All other max load capacities	***	***	***	***	***
All complete units	***	***	***	***	***
Carriage-related subassemblies	***	***	***	***	***
All other subassemblies	***	***	***	***	***
All subassemblies	***	***	***	***	***
All in-scope LBCCs	***	***	***	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 "—". See appendix E for additional data by product type across the period of investigation.

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.[5] Negligible imports are generally defined in the Act, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.[6] Table 4.7 presents information on imports from Japan and nonsubject sources. Imports from Japan accounted for *** percent of total imports of LBCCs by quantity in the 12-month period preceding the filing of the petition (i.e. April 2024 through March 2025).

Table 4.7 LBCCs: U.S. imports in the twelve-month period preceding the filing of the petition, period, April 2024 through March 2025

Quantity in units; share in percent

Source of imports	Quantity	Share of quantity
Japan	***	***
Nonsubject sources	***	***
All import sources	***	***

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

Note: The twelve-month period preceding the filing of the petition is April 2024 through March 2025. This table does not include missing questionnaire response data for the two largest importers from nonsubject sources as discussed above. However, Japan would still be above the three percent negligibility threshold were the nonsubject import quantities in the 12 months preceding the petition equal to the 2024 estimated nonsubject import quantity of 86 units (see table 4.4); in that scenario the Japan share would be *** percent.

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

[6] Section 771 (24) of the Act (19 U.S.C § 1677(24)).

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 LBCCs. U.S. consumption, by quantity, *** by *** percent from 2022 to 2024. During the same period, U.S. producers' market share *** from *** percent to *** percent, while the share of subject imports *** from *** percent to *** percent.

Table 4.8 LBCCs: Apparent U.S. 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	***	***	***
Japan	Quantity	***	***	***
Nonsubject sources	Quantity	***	***	***
All import sources	Quantity	***	***	***
All sources	Quantity	***	***	***
U.S. producers	Share	***	***	***
Japan	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 and the petitioner's postconference brief, p. 27.

Note: This version of apparent consumption is the same for both scenarios for the definition of the domestic industry: Either defining Link-Belt as a U.S. producer or not. This is because the Commission's methodology for constructing apparent consumption for second level producers (such as U.S. processor Link-Belt) is to not reclassify volumes already included in imports of subject merchandise defined by Commerce. Quantity for U.S. shipments reflect only producers' U.S. shipment quantities. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported as an import when analyzing the domestic industry defined as both the U.S. producer and U.S. processor.

Figure 4.2 LBCCs: Apparent U.S. consumption based on quantity, by source and period

* * * * * * *

Source: Compiled from data submitted in response to Commission questionnaires

Note: Only quantity data are show because the petitioner's estimated nonsubject import volumes were used to construct apparent consumption. There is not adequate record evidence to estimate the missing value data for nonsubject import volumes.

Part 5: Pricing data[1]

Factors affecting prices

Raw material costs

Production of LBCCs begins with high strength steel plate that is cut into specific shapes and welded together to form the structures of the assemblies. Lattice-booms are made from structural steel tubes.[2]

Raw materials, as a share of U.S. producer Manitowoc's cost of goods sold (COGS), increased from *** percent in 2022 to *** percent in 2024. U.S. producer Manitowoc reported that raw material costs had fluctuated up, stating that costs of raw materials, parts, and components generally have increased. Importers Kobelco and Link-Belt reported that raw material costs had steadily increased. Importer *** stated that the increase in raw material costs affected price increases from 2022 to 2024. Importer *** reported that sales prices are more influenced by competitive pressures rather than fluctuations in material costs.

As shown in tables 5.1 and 5.2, and figure 5.1, prices for hot-rolled coil and carbon grade cut-to-length (CTL) plate declined irregularly from January 2022 to April 2025. Hot-rolled coil prices declined by *** percent from January 2022 to December 2024 before increasing by *** percent the first four months of 2025. Similarly, CTL plate prices declined by *** percent from January 2022 to December 2024 before increasing by *** percent the first four months of 2025. Overall, hot-rolled coil and CTL plate prices declined by *** percent and *** percent, respectively, from January 2022 to April 2025.

[1] U.S. processor and importer Link-Belt responded to price setting questions in both the U.S. Producers' and Importers' questionnaires. Unless otherwise stated, Link-Belt's responses are categorized as importer responses to limit double counting of its responses. Importer *** responded to price setting questions. Unless otherwise noted, staff has not included its responses in this section because it did not sell into the U.S. market.

[2] Conference transcript, pp. 19, 21 (Konkle).

Table 5.1 Raw materials: Prices per short ton of hot-rolled coil, monthly, January 2022 to April 2025

Price in dollars per short ton

Month	2022	2023	2024	2025
January	***	***	***	***
February	***	***	***	***
March	***	***	***	***
April	***	***	***	***
May	***	***	***	NA
June	***	***	***	NA
July	***	***	***	NA
August	***	***	***	NA
September	***	***	***	NA
October	***	***	***	NA
November	***	***	***	NA
December	***	***	***	NA

Sources: ***.

Table 5.2 Raw materials: Prices per short ton of cut-to-length carbon grade plate, monthly, January 2022 to April 2025

Price in dollars per short ton

Month	2022	2023	2024	2025
January	***	***	***	***
February	***	***	***	***
March	***	***	***	***
April	***	***	***	***
May	***	***	***	NA
June	***	***	***	NA
July	***	***	***	NA
August	***	***	***	NA
September	***	***	***	NA
October	***	***	***	NA
November	***	***	***	NA
December	***	***	***	NA

Sources: ***.

Figure 5.1 Raw materials: Prices per short ton of hot-rolled coil and cut-to-length carbon grade plate, monthly, January 2022 to April 2025

* * * * * * *

Sources: *** and ***.

Transportation costs to the U.S. market

Transportation costs for LBCCs shipped from Japan to the United States averaged 3.4 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

U.S. producer Manitowoc and importer *** reported that their customers typically arrange transportation; importer *** reported that it arranges transportation. Importers reported that their U.S. inland transportation costs ranged from 1.1 (***) to 2.0 percent (***).[4]

[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 numbers 8426.49.0010 and 8426.49.0090.

[4] ***.

Pricing practices

Pricing methods

U.S. producer Manitowoc and both importers reported setting prices using *** (table 5.3). Importer *** also reported selling on a transaction-by-transaction basis and via contracts. Manitowoc generally prices LBCCs based on a list price which present a price for a base crane of a particular model, as well as prices for various options including different boom lengths, luffing jib options, and capacity maximizers.[5]

Table 5.3 LBCCs: Count of U.S. producers' and importers' reported price setting methods

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

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. producer Manitowoc and importer *** reported selling all of their LBCCs in the spot market while importer *** reported selling approximately *** percent under annual contracts and *** percent in the spot market in 2024 (summarized in table 5.4). Importer *** reported that its short-term and annual contracts fix price but allow for price renegotiation. Its short-term contracts average *** days.

Table 5.4 LBCCs: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2024

Share in percent

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

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

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

[5] Conference transcript, p. 26 (Hull).

Sales terms and discounts

The U.S. producer and importers typically quote prices on an f.o.b. basis. Petitioner stated that it provides distributors a discount off the list price and that it generally looks to offer the same prices to all of its customers.[6] Importer *** reported quantity and total volume discounts while *** reported that additional discounts are limited and granted on a case-by-case basis depending on the specific transaction. Importer *** reported discounts based on customer category.

Price data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following LBCC products shipped to unrelated U.S. customers during January 2022 to December 2024.

Product 1.—Lattice-boom crawler crane with a maximum lift capacity of 110 U.S. tons, boom length of 140-160 ft, with a base engine and model configuration, and without any jib or other attachments.

Product 2.—Lattice-boom crawler crane with a maximum lift capacity of 200 U.S. tons, boom length of 200-220 ft, with a base engine and model configuration, and without any jib or other attachments.

Product 3.—Lattice-boom crawler crane with a maximum lift capacity of 275 U.S. tons, boom length of 215-235 ft, with a base engine and model configuration, and without any jib or other attachments.

[6] Conference transcript, p. 26 (Hull).

Manitowoc and Kobelco provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.[7] [8] Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' U.S. shipments of LBCCs and *** percent of U.S. shipments of subject imports from Japan in 2024.[9] Price data for products 1 to 3 are presented in tables 5.5 to 5.7 and figures 5.2 to 5.4.

[7] 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.

[8] U.S. processor and importer Link-Belt provided sales price data for *** products. However, Link-Belt imports the crawler assemblies from its sister company in Japan. Respondent Link-Belt's postconference brief, exhibit 1, p. 6. ***. Staff email correspondence with ***. This price data accounts for *** percent of Link-Belt's reported U.S. shipments of LBCCs. Because the LBCCs price data reported by Link-Belt is of mixed origin, staff has presented this data separately from U.S. producer and importer price data reported by Manitowoc and Kobelco. Appendix F presents Link-Belt's price data when categorized as an import source of LBCCs from Japan. Appendix G presents Link-Belt's price data when categorized as a U.S. producer of LBCCs

[9] Pricing coverage is based on U.S. shipments reported in questionnaires.

Table 5.5 LBCCs: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter

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

Period	U.S. producer price	U.S. producer quantity	Japan price	Japan quantity	Japan 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	***	***	***	***	***

Period	U.S. processor price	U.S. processor quantity
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: Lattice boom crawler crane with a maximum lift capacity of 110 U.S. tons, boom length of 140-160 ft, with a base engine and model configuration, and without any jib or other attachments.

Table 5.6 LBCCs: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter

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

Period	U.S. producer price	U.S. producer quantity	Japan price	Japan quantity	Japan 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	***	***	***	***	***

Period	U.S. processor price	U.S. processor quantity
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: Lattice boom crawler crane with a maximum lift capacity of 200 U.S. tons, boom length of 200-220 ft, with a base engine and model configuration, and without any jib or other attachments.

Table 5.7 LBCCs: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter

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

Period	U.S. producer price	U.S. producer quantity	Japan price	Japan quantity	Japan 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	***	***	***	***	***

Period	U.S. processor price	U.S. processor quantity
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: Lattice boom crawler crane with a maximum lift capacity of 275 U.S. tons, boom length of 215-235 ft, with a base engine and model configuration, and without any jib or other attachments.

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

Price of product 1

* * * * * * *

Volume of product 1

* * * * * * *

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

Note: Product 1: Lattice boom crawler crane with a maximum lift capacity of 110 U.S. tons, boom length of 140-160 ft, with a base engine and model configuration, and without any jib or other attachments.

Figure 5.3 LBCCs: 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: Lattice boom crawler crane with a maximum lift capacity of 200 U.S. tons, boom length of 200-220 ft, with a base engine and model configuration, and without any jib or other attachments.

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

Price of product 3

* * * * * * *

Volume of product 3

* * * * * * *

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

Note: Product 3: Lattice boom crawler crane with a maximum lift capacity of 275 U.S. tons, boom length of 215-235 ft, with a base engine and model configuration, and without any jib or other attachments.

Price trends

In general, prices increased during January 2022 to December 2024. Table 5.8 summarizes the price trends, by country and by product. As shown in the table, the U.S. producer's price for product 1 increased by *** during January 2022 to December 2024 while the importer's price increased by *** percent. There was insufficient reporting for domestically produced and imported products 2 and 3 to calculate a trend for the entire period of investigation.[10] U.S. processor and importer Link-Belt's price increases ranged from *** percent to *** percent during January 2022 to December 2024.

Table 5.8 LBCCs: Summary of price data, by product and source, January 2022 to December 2024

Quantity in units, price in 1,000 dollars per unit

Product	Source	Number of quarters	Quantity of shipments	Low price	High price	First quarter price	Last quarter price	Percent change in price over period
Product 1	U.S. producer	10	***	***	***	***	***	***
Product 1	U.S. processor	12	***	***	***	***	***	***
Product 1	Japan	8	***	***	***	***	***	***
Product 2	U.S. producer	—	***	***	***	***	***	***
Product 2	U.S. processor	12	***	***	***	***	***	***
Product 2	Japan	5	***	***	***	***	***	***
Product 3	U.S. producer	9	***	***	***	***	***	***
Product 3	U.S. processor	12	***	***	***	***	***	***
Product 3	Japan	1	***	***	***	***	***	***

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

Note: Percent change column is percentage change from the first quarter 2022 to the last quarter in 2024.

[10] U.S. producer *** prices for product 3 increased by *** percent from the third quarter of 2022 to the fourth quarter of 2024.

Price comparisons

As shown in tables 5.9 and 5.10, prices for product imported from Japan were below those for U.S.-produced product in all nine instances (*** units); margins of underselling ranged from *** to *** percent.

Table 5.9 LBCCs: Instances of underselling and overselling and the range and average of margins, by product

Quantity in units; margin in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	***	***	***	***	***
Product 2	Underselling	***	***	***	***	***
Product 3	Underselling	***	***	***	***	***
Total, all products	Underselling	9	***	***	***	***
Product 1	Overselling	***	***	***	***	***
Product 2	Overselling	***	***	***	***	***
Product 3	Overselling	***	***	***	***	***
Total, all products	Overselling	0	***	***	***	***

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Table 5.10 LBCCs: Instances of underselling and overselling and the range and average of margins, by year

Quantity in units; margin in percent

Year	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
2022	Underselling	***	***	***	***	***
2023	Underselling	***	***	***	***	***
2024	Underselling	***	***	***	***	***
Total, all years	Underselling	9	***	***	***	***
2022	Overselling	***	***	***	***	***
2023	Overselling	***	***	***	***	***
2024	Overselling	***	***	***	***	***
Total, all years	Overselling	0	***	***	***	***

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Lost sales and lost revenue

The Commission requested that U.S. producers of LBCCs report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of LBCCs from Japan during 2022 to 2024. Petitioner Manitowoc reported that it ***.[11] Petitioner Manitowoc submitted lost sales and lost revenue allegations that identified two firms with which they lost sales or revenue (one lost sales allegation occurring during 2022 to 2025, and one consisting of both types of allegations occurring in 2025). Petitioner stated that it is often unable to pinpoint a lost sales opportunity because end users are not consistently providing information to it or its distributors.[12] As described in part 2, petitioner often sells to affiliated or other distributors, which in turn compete for sales with the distributors of Japanese product for sales to construction companies.[13]

Staff contacted two purchasers and received responses from both purchasers. ***. Responding purchasers reported purchasing *** units of LBCCs during January 2022 to December 2024 (table 5.11). During 2024, responding purchasers purchased *** percent from U.S. producers, *** percent from Japan, *** percent from nonsubject countries, and *** percent from "unknown source" countries. Purchasers were asked about changes in their purchasing patterns from different sources since 2022; both responding purchasers reported no change in their purchase patterns.

Of the two responding purchasers, both reported that, since 2022, they had not purchased imported LBCCs from Japan instead of U.S.-produced product. Of the two responding purchasers, one reported that U.S. producers had reduced prices in order to compete with lower-priced imports from Japan; one reported that they did not know. Purchaser *** estimated that Manitowoc reduced prices by *** percent and stated that "***."

[11] U.S. processor Link-Belt responded to these questions as well and reported that it ***.
[12] Conference transcript, p. 27 (Hull).
[13] Conference transcript, pp. 24-25 (Hull).

Table 5.11 LBCCs: Purchasers' reported purchases and imports, by firm and source

Quantity in units, share in percent

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

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

Note: All other includes all other sources and unknown sources. Change is the percentage point change in the share of the firm's total purchases of domestic and/or subject country imports between first and last years.

In responding to the lost sales lost revenue survey, purchaser *** provided additional information on purchases and market dynamics. Purchaser *** stated that while it only purchases from Manitowoc, it has extensive experience with the relevant purchasing factors in the crawler crane market given its own sales to end users. It continued that given its relationship to Manitowoc, *** experienced lost sales on behalf of Manitowoc when selling to crane rental companies during the period. As an example, it lost a sale to ***.

*** stated that its volume of quotes has stayed relatively flat while its close rate has declined, despite a growing market.[14]

[14] Conference transcript, p. 33 (Poff). Close rate was described as quoted to secured sales. Id.

Part 6: Financial experience of U.S. producers and processors

Background[1]

One U.S. producer (Manitowoc) and one U.S. processor (Link-Belt) provided usable financial results on their LBCCs operations. Both firms reported financial data on a calendar year basis and on the basis of GAAP.[2] [3]

Operations on LBCCs

Table 6.1 presents the data of U.S. producer Manitowoc's operations in relation to LBCCs, while table 6.2 presents the corresponding changes in AUVs. Table 6.3 presents the data of U.S. processor Link-Belt's operations in relation to LBCCs, and table 6.4 presents the corresponding changes in AUVs. Figure 6.1 presents U.S. producer Manitowoc's and U.S. processor Link-Belt's share of the combined total net sales quantity in 2024. Lastly, table 6.5 presents the data of U.S. producer Manitowoc's and U.S. processor Link-Belt's aggregate financial results in relation to their LBCCs operations, and table 6.6 presents the corresponding changes in AUVs.

[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] Manitowoc stated that ***. The firm added that "while some parts and components are imported, the majority of its LBCCs production is within the United States." *** U.S. producer questionnaire, section 5.2, and conference transcript p. 44 (Middleton).

[3] Link-Belt stated that it manufactures "the entire boom assembly, the jib assembly, the luffing jib if so equipped, and the live mast" in the United States, and added that ***. Conference transcript p. 144 (Preheim), and Link-Belt's postconference brief, exhibit 1, p. 6.

Table 6.1 LBCCs: U.S. producer Manitowoc's results of operations, by item and period

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

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

Table continued.

Table 6.1 (Continued) LBCCs: U.S. producer Manitowoc's results of operations, by item and period

Shares in percent; unit values in 1,000 dollars per unit; 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	***	***	***
Transfers to related firms	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	1	1	1

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

Note: Shares represent the share of COGS.

Table 6.2 LBCCs: Changes in AUVs between comparison periods for U.S. producer Manitowoc

Changes in percent

Item	2022–24	2022–23	2023–24
Commercial sales	▼***	▼***	▲***
Transfers to related firms	▼***	▲***	▼***
Total net sales	▼***	▼***	▼***
COGS: Raw materials	▼***	▼***	▼***
COGS: Direct labor	▼***	▼***	▼***
COGS: Other factory	▼***	▼***	▼***
COGS: Total	▼***	▼***	▼***

Table continued.

Table 6.2 (Continued) LBCCs: Changes in AUVs between comparison periods for U.S. producer Manitowoc

Changes in 1,000 dollars per unit

Item	2022–24	2022–23	2023–24
Commercial sales	▼***	▼***	▲***
Transfers to related firms	▼***	▲***	▼***
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 LBCCs: U.S. processor Link-Belt's results of operations, by item and period

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

Item	Measure	2022	2023	2024
Commercial sales	Quantity	***	***	***
Transfers to related firms	Quantity	***	***	***
Total net sales	Quantity	***	***	***
Commercial sales	Value	***	***	***
Transfers to related firms	Value	***	***	***
Total net sales	Value	***	***	***
COGS: Subject LBCC subassemblies	Value	***	***	***
COGS: Total LBCC subassemblies	Value	***	***	***
COGS: All other raw materials	Value	***	***	***
COGS: Total 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	***	***	***
Cash flow	Value	***	***	***
COGS: Total 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 6.3 (Continued) LBCCs: U.S. processor Link-Belt's results of operations, by item and period

Shares in percent; unit values in 1,000 dollars per unit; count in number of firms reporting

Item	Measure	2022	2023	2024
COGS: Total LBCC subassemblies	Share	***	***	***
COGS: All other raw materials	Share	***	***	***
COGS: Total raw materials	Share	***	***	***
COGS: Direct labor	Share	***	***	***
COGS: Other factory	Share	***	***	***
COGS: Total	Share	100.0	100.0	100.0
Commercial sales	Unit value	***	***	***
Transfers to related firms	Unit value	***	***	***
Total net sales	Unit value	***	***	***
COGS: Subject LBCC subassemblies	Unit value	***	***	***
COGS: All other raw materials	Unit value	***	***	***
COGS: Total 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	1	1	1

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

Note: Shares represent the share of COGS. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Table 6.4 LBCCs: Changes in AUVs between comparison periods for U.S. processor Link-Belt

Changes in percent

Item	2022–24	2022–23	2023–24
Commercial sales	▲***	▲***	▲***
Transfers to related firms	▲***	▼***	▲***
Total net sales	▲***	▲***	▲***
COGS: Total LBCC subassemblies	▲***	▲***	▲***
COGS: All other raw materials	▲***	▲***	▼***
COGS: Total raw materials	▲***	▲***	▲***
COGS: Direct labor	▲***	▲***	▼***
COGS: Other factory	▲***	▲***	▲***
COGS: Total	▲***	▲***	▲***

Table continued.

Table 6.4 (Continued) LBCCs: Changes in AUVs between comparison periods for U.S. processor Link-Belt

Changes in 1,000 dollars per unit

Item	2022–24	2022–23	2023–24
Commercial sales	▲***	▲***	▲***
Transfers to related firms	▲***	▼***	▲***
Total net sales	▲***	▲***	▲***
COGS: Total LBCC subassemblies	▲***	▲***	▲***
COGS: All other raw materials	▲***	▲***	▼***
COGS: Total raw materials	▲***	▲***	▲***
COGS: Direct labor	▲***	▲***	▼***
COGS: Other factory	▲***	▲***	▲***
COGS: Total	▲***	▲***	▲***
Gross profit or (loss)	▲***	▲***	▲***
SG&A expense	▲***	▲***	▼***
Operating income or (loss)	▲***	▲***	▲***
Net income or (loss)	▲***	▲***	▲***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

Figure 6.1 LBCCs: U.S. producer Manitowoc's and U.S. processor Link-Belt's share of net sales quantity in 2024

* * * * * * *

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

Table 6.5 LBCCs: U.S. producer Manitowoc's and U.S. processor's Link-Belt's combined results of operations, by item and period

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

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

Table continued.

Table 6.5 (Continued) LBCCs: U.S. producer's and processor's combined results of operations, by item and period

Shares in percent; unit values in 1,000 dollars per unit; 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	***	***	***
Commercial sales	Unit value	***	***	***
Transfers to related firms	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	2	2	2

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

Note: Shares represent the share of COGS.

Table 6.6 LBCCs: Changes in AUVs between comparison periods for U.S. producer Manitowoc and U.S. processor Link-Belt combined

Changes in percent

Item	2022–24	2022–23	2023–24
Commercial sales	▲***	▲***	▲***
Transfers to related firms	▼***	▲***	▼***
Total net sales	▲***	▲***	▲***
COGS: Raw materials	▲***	▲***	▲***
COGS: Direct labor	▲***	▲***	▼***
COGS: Other factory	▲***	▲***	▼***
COGS: Total	▲***	▲***	▼***

Table continued.

Table 6.6 (Continued) LBCCs: Changes in AUVs between comparison periods for U.S. producer Manitowoc and U.S. processor Link-Belt combined

Changes in 1,000 dollars per unit

Item	2022–24	2022–23	2023–24
Commercial sales	▲***	▲***	▲***
Transfers to related firms	▼***	▲***	▼***
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.

Net sales

U.S. producer Manitowoc

As shown in table 6.1, commercial sales of LBCCs ranged between *** percent of total sales quantity from 2022 to 2024 accounting for the majority of total sales quantity, while transfers to related firms ranged between *** percent.[4] Total sales quantity and value increased consistently from 2022 to 2024, with the majority of the increase occurring between 2022 and 2023.[5] On a 1,000 dollars per unit basis, total sales value decreased from $*** in 2022 to $*** in 2024. Commercial sales' and transfers to related firms' unit sales values ***.[6]

[4] ***. *** U.S. producers questionnaire response, section 2.12.

[5] Petitioner stated that demand for crawler cranes is driven primarily by general economic conditions and non-residential construction spending, and that a relatively strong economy in recent years, the 2021 Infrastructure Investment and Jobs act stimulus, and the CHIPS act contributed to a "significant" increase in demand since 2022. Conference transcript pp. 25-26 (Hull).

[6] ***. Email from ***, April 29, 2025.

U.S. processor Link-Belt

As shown in table 6.3, commercial sales of LBCCs ranged between *** percent of total sales quantity, while transfers to related firms ranged between *** percent from 2022 to 2024.[7] Total sales quantity decreased irregularly, while total sales value increased overall from 2022 to 2024.[8] On a 1,000 dollars per unit basis, total sales value increased from $*** in 2022 to $*** in 2024.

Combined net sales

As shown in table 6.5, the combined total sales quantity of U.S. producer Manitowoc and U.S. processor Link-Belt increased irregularly from 2022 to 2024, while sales value increased consistently during the same period. On a 1,000 dollars per unit basis, total sales value increased from $*** in 2022 to $*** in 2024. Unit sales value of Manitowoc and Link-Belt ***.[9]

Cost of goods sold and gross profit or loss

U.S. producer Manitowoc

As shown in table 6.1, raw materials cost was the largest component of COGS, ranging between *** percent of total COGS from 2022 to 2024. Raw materials cost increased consistently from 2022 to 2024 in absolute value, and decreased on a 1,000 dollars per unit basis from $*** in 2022 to $*** in 2024. As a ratio to net sales, raw materials cost decreased irregularly from *** percent in 2022 to *** percent in 2024.

[7] ***. *** U.S. producers questionnaire response, section 2.12.

[8] ***. Link-Belt's postconference brief, exhibit 1, p. 1.

[9] ***. Petitioner also stated that crawler cranes can range in price from about $800,000 to over $8.0 million. U.S. producers questionnaire response, section 2.10 and 6.4, and conference transcript p. 27 (Hull).

Table 6.7 shows that fabricated steel accounted for the largest share of raw materials cost in 2024 accounting for *** percent of raw materials cost. Hydraulic components, steel plates, power trains and electronic components accounted for *** percent, and other raw material inputs accounted for the remaining *** percent of total raw materials cost in 2024. [10]

Table 6.7 LBCCs: U.S. producer Manitowoc's raw material costs in 2024, by type

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

Item	Value	Share of value
Fabricated steel components	***	***
Hydraulic components	***	***
Steel plates and steel tubes	***	***
Powertrains	***	***
Electronic components	***	***
Other material inputs	***	***
All raw materials	***	100.0

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

Note: Other raw material inputs include ***.

As shown in table 6.1, direct labor cost (mostly related to welding) is the smallest component of COGS, ranging between *** percent of total COGS from 2022 to 2024.[11] Direct labor cost increased irregularly in absolute value and decreased consistently on a 1,000 dollars per unit basis from 2022 to 2024.[12] As a ratio to net sales, direct labor cost decreased from *** percent in 2022 to *** percent in 2024.

As shown in table 6.1, other factory costs are the second largest component of COGS ranging between *** percent of total COGS from 2022 to 2024. Other factory costs increased irregularly in absolute value, and decreased consistently on a 1,000 dollars per unit basis from 2022 to 2024. As a ratio to net sales, other factory costs decreased from *** percent in 2022 to *** percent in 2024.

[10] ***. *** U.S. producer questionnaire response, section 3.9f, and petitioner's postconference brief pp. 6-7.

[11] Manitowoc stated that LBCCs manufacturing is labor intensive as the material and labor costs that go into an individual crane are substantial. The majority of workers are welders. Conference transcript, p. 21 (Konkle).

[12] Manitowoc indicated that it experienced some difficulties obtaining labor. Conference transcript p. 43 (Middleton).

As shown in table 6.1, total COGS increased by *** percent from 2022 to 2024 mainly reflecting the trends of raw materials cost. On a 1,000 dollars per unit basis, total COGS decreased from $*** in 2022 to $*** in 2024, and decreased as a ratio to net sales from *** percent in 2022 to *** percent in 2024.[13]

Total net sales value was consistently *** than total COGS from 2022 to 2024, which resulted in a *** in each year. Sales value, however, increased at a higher rate than total COGS from 2022 to 2024, thus, *** improved from *** in 2022 to *** in 2024. As a ratio to net sale, *** improved from *** percent in 2022 to *** percent in 2024 (see table 6.1).

U.S. processor Link-Belt

As shown in table 6.3, raw materials cost which included imported LBCCs subassemblies and other raw material inputs, is the largest component of COGS, ranging between *** percent of total COGS from 2022 to 2024.[14] Raw materials cost increased irregularly from 2022 to 2024 in absolute value, and consistently on a 1,000 dollars per unit basis from $*** in 2022 to $*** in 2024. As a ratio to net sales, raw materials cost decreased irregularly from *** percent in 2022 to *** percent in 2024.

Table 6.8 shows the share of raw materials, by type and source. LBCC subassemblies from subject source accounted for *** percent of raw materials cost, while all other raw materials (***) accounted for the remaining *** percent in 2024.[15] [16]

Table 6.8 LBCCs: U.S. processor Link-Belt's raw material costs in 2024, by type

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

Item	Value	Share of value
Subject LBCCs	***	***
All LBCCs	***	***
Other raw material input	***	***
All raw material input	***	100.0

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

[13] In its postconference brief, ***. Petitioner's post conference brief p. 32.

[14] ***.

[15] ***. Link-Belt's Postconference brief p. 10.

[16] Link-Belt's U.S. producers questionnaire, section 6.6a.

As shown in table 6.3, direct labor cost is the smallest component of COGS, ranging between *** percent from 2022 to 2024. Direct labor cost increased in absolute value and on a 1,000 dollars per unit basis from 2022 to 2024. As a ratio to net sales, direct labor cost somewhat increased irregularly from *** percent in 2022 to *** percent in 2024.[17]

As shown in table 6.3, other factory costs are the second largest component of COGS, ranging between *** percent from 2022 to 2024. Other factory costs increased consistently in absolute value and on a 1,000 dollars per unit basis, from 2022 to 2024. As a ratio to net sales, other factory costs increased irregularly from *** percent in 2022 to *** in 2024.

As shown in table 6.3, total COGS increased irregularly by *** percent from 2022 to 2024 with all the increase occurring from 2023 to 2024. On a 1,000 dollars per unit basis, total COGS increased from $*** in 2022 to $*** in 2024, and decreased as a ratio to net sales from *** percent in 2022 to *** percent in 2024.

As shown in table 6.3, total net sales value was consistently *** than total COGS from 2022 to 2024 which resulted in *** in each year. Total sales value also increased at a higher rate than total COGS from 2022 to 2024, thus *** increased irregularly from *** in 2022 to *** in 2024. As a ratio to net sales, *** increased from *** percent in 2022 to *** percent in 2024.

Combined gross profit or loss

For U.S. producer Manitowoc and U.S. processor Link-Belt, the combined total gross profit increased irregularly from *** in 2022 to *** in 2024, driven primarily by the increase in *** gross profit. As a ratio to net sales, combined gross profit also increased irregularly from 2022 (*** percent) to 2024 (*** percent) (see table 6.5).

[17] Link-Belt stated that it faced some difficulty with labor shortages and assembly welding manpower. Conference transcript p. 136 (Shultz).

SG&A expenses and operating income or loss

U.S. producer Manitowoc

As shown in table 6.1, SG&A expenses for U.S. producer Manitowoc increased consistently in absolute value, but decreased irregularly as a ratio to net sales from 2022 to 2024.

Similar to *** improved overall from *** in 2022 to *** in 2024. As ratio to net sales, operating income ***, but improved overall from 2022 to 2024 (see table 6.1).

U.S. processor Link-Belt

As shown in table 6.3, SG&A expenses for U.S. processor Link-Belt increased consistently in absolute value and irregularly as a ratio to net sales from 2022 to 2024.

The increase in gross profit was *** than the increase in SG&A expenses from 2022 to 2024, thus, operating income increased irregularly from *** to ***. As a ratio to net sales, operating income increased consistently from 2022 to 2024 (see table 6.3).

Combined operating income or loss

For U.S. producer Manitowoc and U.S. processor Link-Belt, the combined operating income impacted by *** was *** from 2022 to 2024, but overall improved from *** in 2022 to *** in 2024. As a ratio to net sales, operating income ***, but improved from 2022 (*** percent) to 2024 (*** percent) (see table 6.5).

All other expenses and net income or loss

U.S. producer Manitowoc

Classified bellow the operating income level are interest expense, all other expense, and all other income items. Interest expense, other expense, and other income were combined and only the net amount is shown in table 6.1. The net amount primarily reflecting *** in 2022 and 2023 decreased during that period and was offset by *** in 2024.

As show in in table 6.1, *** improved irregularly in absolute value and consistently as a ratio to net sales from 2022 to 2024.

U.S. processor Link-Belt

For U.S. processor Link-Belt interest expense, all other expense, and all other income items were also combined and only the net amount is shown in table 6.3. The net amount primarily comprised of *** increased from 2022 to 2024.

As shown in table 6.3, *** increased irregularly in absolute value and consistently as a ratio to net sales from 2022 to 2024.

Combined net income or loss

For U.S. producer Manitowoc and U.S. processor Link-Belt, the combined net income followed the same directional trends as the combined operating income, it was *** from 2022 to 2024, but overall improved from *** in 2022 to *** in 2024. As a ratio to net sales, net income ***, but improved irregularly from 2022 (*** percent) to 2024 (*** percent). [18]

[18] A variance analysis is not shown due to ***.

Capital expenditures, R&D expenses, assets and ROA

Table 6.9 presents U.S. producer Manitowoc's capital expenditures, R&D expenses, assets, and ROA. The firm's narrative explanations of the nature, focus, and significance of the items are presented in table 6.10. Capital expenditures, R&D expenses, and assets increased overall from 2022 to 2024, while ROA was *** but improved irregularly during the same period.

Table 6.9 LBCCs: U.S. producer Manitowoc's capital expenditures, R&D expenses, total net assets, and ROA, by item and period

Value in 1,000 dollars; ratios in percent

Item	Measure	2022	2023	2024
Capital expenditures	Value	***	***	***
R&D expenses	Value	***	***	***
Assets	Value	***	***	***
Return on assets	Ratio	***	***	***

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

Table 6.10 LBCCs: U.S. producer Manitowoc's narrative descriptions of its capital expenditures, R&D expenses, and total net assets

Item	Narrative on item
Capital expenditures	***
R&D expenses	***
Assets	***

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

Table 6.11 presents U.S. processor Link-Belt's capital expenditures, R&D expenses, assets, and return on assets. The firm's narrative explanations of the nature, focus, and significance of the items are presented in table 6.12. Capital expenditures, R&D expenses, and assets and ROA increased overall from 2022 to 2024.

Table 6.11 LBCCs: U.S. processor Link-Belt's capital expenditures, R&D expenses, total net assets, and ROA, by item and period

Value in 1,000 dollars; ratios in percent

item	Measure	2022	2023	2024
Capital expenditures	Value	***	***	***
R&D expenses	Value	***	***	***
Assets	Value	***	***	***
Return on assets	Ratio	***	***	***

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

Table 6.12 LBCCs: U.S. processor Link-Belt's narrative descriptions of its capital expenditures, R&D expenses, and total net assets

Item	Narrative on item
Capital expenditures	***
R&D expenses	***
Assets	***

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

Table 6.13 presents U.S. producer Manitowoc and U.S. processor Link-Belt's combined capital expenditures, R&D expenses, assets, and ROA. Capital expenditures, R&D expenses, and assets increased overall from 2022 to 2024, while ROA was *** but improved during the same period.

Table 6.13 LBCCs: U.S. producers and U.S. processors combined capital expenditures, R&D expenses, total net assets, and ROA, by item and period

Value in 1,000 dollars; ratios in percent

Item	Measure	2022	2023	2024
Capital expenditures	Value	***	***	***
R&D expenses	Value	***	***	***
Assets	Value	***	***	***
Return on assets	Ratio	***	***	***

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

Capital and investment[19]

The Commission requested U.S. producers and U.S. processors of LBCCs to describe any actual or potential negative effects of imports of LBCCs from Japan on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table 6.14 presents the impact in each category and table 6.15 provides *** narrative responses.

Table 6.14 LBCCs: * 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.

[19] ***. *** U.S. producers questionnaire, sections 10, 11 and 12.

Table 6.15 LBCCs: * 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
***	***
***	***
***	***
***	***

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 factors*[1]*--*
>
> *(I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,*
>
> *(II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,*
>
> *(III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,*
>
> *(IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports,*
>
> *(V) inventories of the subject merchandise,*

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

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

(VII) in any investigation under this title which involves imports of both a raw agricultural product (within the meaning of paragraph (4)(E)(iv)) and any product processed from such raw agricultural product, the likelihood that there will be increased imports, by reason of product shifting, if there is an affirmative determination by the Commission under section 705(b)(1) or 735(b)(1) with respect to either the raw agricultural product or the processed agricultural product (but not both),

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

(IX) any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).[2]

Information on the volume and pricing of imports of the subject merchandise is presented in Parts 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 Japan

The Commission issued foreign producers' or exporters' questionnaires to two firms believed to produce and/or export LBCCs from Japan.[3] Usable responses to the Commission's questionnaire were received from two firms: Kobelco Construction Machinery and Sumitomo Heavy Industries.

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

Table 7.1 LBCCs: Number of responding producers/exporters, approximate share of production, and exports to the United States as a share of U.S. imports from Japan, 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)
Japan	2	***	***

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

Table 7.2 presents information on the LBCCs operations of the responding subject producers/exporters in 2024.

Table 7.2 LBCCs: Summary data for subject foreign producers, by firm 2024

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)
Kobelco	***	***	***	***	***	***
Sumitomo	***	***	***	***	***	***
All individual producers	***	100.0	***	100.0	***	***

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

There were no important industry events in the Japanese industry identified by interested parties in this proceeding and no relevant information from outside sources was found.

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

Changes in operations

Producers in Japan were asked to report any change in the character of their operations or organization relating to the production of LBCCs since 2022. *** reported production curtailments.[4]

Installed and practical overall capacity

Table 7.3 presents data on subject producers' installed capacity, practical overall capacity, and practical LBCCs capacity and production on the same equipment. Installed overall capacity was unchanged from 2022 to 2024. Practical overall capacity increased from 2022 to 2023 by *** percent and increased in 2024 by *** percent, for an overall increase of *** percent between 2022 to 2024. Practical LBCCs capacity increased by *** percent from 2022 to 2023 and increased in 2024 by *** percent for an overall increase of *** percent between 2022 and 2024. During the same period, installed overall utilization increased by *** percentage points from 2022 to 2023 and decreased in 2024 by *** percentage points, for an overall increase of *** percentage points between 2022 to 2024. Practical overall utilization increased by *** percentage points from 2022 to 2023 and decreased in 2024 by *** percentage points, for an overall decrease of *** percentage points between 2022 to 2024. Practical LBCCs utilization increased by *** percentage points from 2022 to 2023 and decreased in 2024 by *** percentage points, for an overall increase of *** percentage points between 2022 to 2024.

Table 7.3 LBCCs: Producers' in Japan installed and practical capacity and production on the same equipment as subject production, by period

Capacity and production in units; utilization in percent

Item	Measure	2022	2023	2024
Installed overall	Capacity	***	***	***
Installed overall	Production	***	***	***
Installed overall	Utilization	***	***	***
Practical overall	Capacity	***	***	***
Practical overall	Production	***	***	***
Practical overall	Utilization	***	***	***
Practical LBCC	Capacity	***	***	***
Practical LBCC	Production	***	***	***
Practical LBCC	Utilization	***	***	***

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

[4] Compiled from data submitted in response to Commission questionnaires.

Constraints on capacity

Table 7.4 presents producers' reported capacity constraints in Japan since January 1, 2022. Both subject producers reported such constraints. *** reported a constraint on the existing labor force and *** reported inconsistent supply of material inputs.[5]

Table 7.4 LBCCs: Producers' reported constraints to practical overall capacity in Japan since January 1, 2022, by constraint and firm

Type of constraint	Subject foreign industry, firm name, and narrative response on constraints to practical overall capacity
Existing labor force	***
Supply of material inputs	***

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

[5] One firm, Kobelco, was absent from the U.S. market between February 2021 to October 2022 following that their engine supplier was not meeting the EPA Tier 4 final standard emission standards. Conference transcript, p. 136 (Hodges). Kobelco claims that any increase in production is a return to its normal presence in the U.S. market. Conference transcript, p. 171 (Hodges).

Operations on LBCCs

Table 7.5 presents information on the LBCCs operations of the responding producers/exporters (aggregate data for the subject foreign industry). Subject producers' combined capacity increased by *** percent from 2022 to 2023 and increased by *** percent in 2024 for an overall increase of *** percent between 2022 and 2024. Subject producers' combined capacity is projected to *** increase in 2025 and remain stable in 2026. Production increased by *** percent from 2022 to 2023 and decreased by *** percent in 2024, for an overall increase of *** percent between 2022 to 2024. Production is projected to decrease in 2025 and 2026. Capacity utilization increased from *** percent in 2022 to *** percent in 2023 before decreasing to *** percent in 2024. Capacity utilization is projected to decrease in 2025 and 2026. Inventory ratio to production levels increased from 2022 to 2023 before decreasing in 2024. It is projected to decrease in 2025 and increase in 2026.

Exports of LBCCs to the U.S. accounted for the minority of subject producers' shipments. Such exports increased from *** percent of total shipments in 2022 to *** percent in 2023 before *** decreasing in 2024. Exports of LBCCs to the U.S. as a share of total shipments are projected to decrease in 2025 and 2026 but will still remain above the share in 2024.

Table 7.5 LBCCs: Data on industry in Japan, by period

Quantity in units

Item	2022	2023	2024	Projection 2025	Projection 2026
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Internal consumption	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Home market shipments	***	***	***	***	***
Exports to the United States	***	***	***	***	***
Exports to all other markets	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***

Table continued

Table 7.5 (Continued) LBCCs: Data on industry in Japan, 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	***	***	***	***	***

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

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

Alternative products

As shown in table 7.6, responding firms in Japan produced other products on the same equipment and machinery used to produce LBCCs. LBCCs accounted for the majority of overall production, increasing from *** percent of overall production in 2022 to *** in 2024.

Table 7.6 LBCCs: Producers' overall production on the same equipment as in-scope production in Japan, by period

Quantity in units; share in percent

Product type	Measure	2022	2023	2024
LBCCs	Quantity	***	***	***
Other products	Quantity	***	***	***
All products	Quantity	***	***	***
LBCCs	Share	***	***	***
Other products	Share	***	***	***
All products	Share	100.0	100.0	100.0

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

Exports

Table 7.7 presents Global Trade Atlas ("GTA") data for exports of "ships' derricks; cranes, including cable cranes; mobile lifting frames, straddle carriers and works trucks fitted with a crane", a broad category that includes many out-of-scope products from the subject country to the United States and to all destination markets. Exports to Taiwan accounted for a plurality of such exports, and to a lesser extent, the United States.

Table 7.7 LBCCs: Derricks, cranes, and work trucks fitted with a crane: exports from Japan, by destination market and by period

Quantity in units; value in 1,000 dollars

Destination market	Measure	2022	2023	2024
United States	Quantity	189	338	252
Taiwan	Quantity	220	229	267
Vietnam	Quantity	254	211	207
South Korea	Quantity	63	82	82
Australia	Quantity	62	82	80
United Kingdom	Quantity	63	41	73
United Arab Emirates	Quantity	2	29	26
Netherlands	Quantity	31	25	24
Qatar	Quantity	11	3	20
All other destination markets	Quantity	405	319	293
Non-U.S. destination markets	Quantity	1,111	1,021	1,072
All destination markets	Quantity	1,300	1,359	1,324
United States	Value	69,015	152,591	161,964
Taiwan	Value	28,529	30,295	41,762
Vietnam	Value	11,309	9,524	6,575
South Korea	Value	22,670	31,319	33,678
Australia	Value	17,688	20,698	22,869
United Kingdom	Value	9,195	4,785	25,066
United Arab Emirates	Value	86	8,830	7,384
Netherlands	Value	10,318	7,936	14,167
Qatar	Value	8,949	914	18,261
All other destination markets	Value	69,625	47,426	34,400
Non-U.S. destination markets	Value	178,369	161,727	204,163
All destination markets	Value	247,384	314,318	366,127

Table continued.

Table 7.7 (Continued): Derricks, cranes, and work trucks fitted with a crane: exports from Japan, by destination market and by period

Unit values in 1,000 dollars per unit; shares in percent

Destination market	Measure	2022	2023	2024
United States	Unit value	365.16	451.45	642.72
Taiwan	Unit value	129.68	132.29	156.41
Vietnam	Unit value	44.53	45.14	31.76
South Korea	Unit value	359.85	381.94	410.71
Australia	Unit value	285.29	252.41	285.86
United Kingdom	Unit value	145.96	116.72	343.37
United Arab Emirates	Unit value	43.20	304.49	284.02
Netherlands	Unit value	332.82	317.45	590.28
Qatar	Unit value	813.50	304.54	913.05
All other destination markets	Unit value	171.91	148.67	117.40
Non-U.S. destination markets	Unit value	160.55	158.40	190.45
All destination markets	Unit value	190.30	231.29	276.53
United States	Share of quantity	14.5	24.9	19.0
Taiwan	Share of quantity	16.9	16.9	20.2
Vietnam	Share of quantity	19.5	15.5	15.6
South Korea	Share of quantity	4.8	6.0	6.2
Australia	Share of quantity	4.8	6.0	6.0
United Kingdom	Share of quantity	4.8	3.0	5.5
United Arab Emirates	Share of quantity	0.2	2.1	2.0
Netherlands	Share of quantity	2.4	1.8	1.8
Qatar	Share of quantity	0.8	0.2	1.5
All other destination markets	Share of quantity	31.2	23.5	22.1
Non-U.S. destination markets	Share of quantity	85.5	75.1	81.0
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 842649 as reported by Japan in the Global Trade Atlas Suite database, accessed April 21, 2025.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—". United States is shown at the top followed by the top destination markets in descending order of 2024 quantity data.

U.S. inventories of imported merchandise

Table 7.8 presents data on U.S. importers' reported inventories of LBCCs. U.S. importers' inventories of imports from subject sources increased by *** percent from 2022 to 2023 before decreasing by *** percent in 2024 for an overall increase of *** percent between 2022 to 2024. U.S. importers' ratio of inventories to U.S. shipments of imports increased from *** percent in 2022 to *** percent in 2023 before *** to *** percent in 2024. *** accounted for the majority of inventories.

Table 7.8 LBCCs: 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	Japan	***	***	***
Ratio to imports	Japan	***	***	***
Ratio to U.S. shipments of imports	Japan	***	***	***
Ratio to total shipments of imports	Japan	***	***	***
Inventories quantity	Nonsubject sources	***	***	***
Ratio to imports	Nonsubject sources	***	***	***
Ratio to U.S. shipments of imports	Nonsubject sources	***	***	***
Ratio to total shipments of imports	Nonsubject sources	***	***	***
Inventories quantity	All import sources	***	***	***
Ratio to imports	All import sources	***	***	***
Ratio to U.S. shipments of imports	All import sources	***	***	***
Ratio to total shipments of imports	All import sources	***	***	***

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

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

U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of LBCCs from Japan after December 31, 2024. Their reported data are presented in table 7.9. The leading individual source of U.S. importers' total arranged subject imports was Japan, which accounted for the majority of arranged subject imports of LBCCs. The subject source accounted for *** of reported arranged imports of LBCCs after January 1. 2025.

Table 7.9 LBCCs: Arranged imports, by source and by period

Quantity in units

Source	Q4 2024	Q1 2025	Q2 2025	Q3 2025	Total
Japan	***	***	***	***	***
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

Based on available information, lattice boom crawler cranes from Japan have not been subject to other antidumping or countervailing duty investigations outside the United States.

Information on nonsubject countries

Table 7.10 presents global export data for HS subheadings 8426.49, 8487.90, and 8425.19, categories that include lattice boom crawler cranes and assemblies as well as out-of-scope products.

Table 7.10 LBCCs: Derricks, cranes, and work trucks fitted with a crane: exports from Japan, by destination market and by period

Quantity in units; share in percent

Exporting country	Measure	2022	2023	2024
United States	Value	99,305	82,120	86,011
China	Value	584,204	837,663	953,635
Japan	Value	247,384	314,318	366,127
Austria	Value	183,276	271,937	284,071
Italy	Value	169,950	220,160	230,689
Netherlands	Value	63,152	165,039	102,145
Belgium	Value	48,603	52,860	71,719
Finland	Value	46,010	46,539	50,716
Singapore	Value	35,144	43,850	39,685
India	Value	11,988	27,571	34,089
Canada	Value	10,461	43,830	23,586
All other exporters	Value	728,918	877,303	756,138
All reporting exporters	Value	2,228,394	2,983,191	2,998,611
United States	Share	4.5	2.8	2.9
China	Share	26.2	28.1	31.8
Japan	Share	11.1	10.5	12.2
Austria	Share	8.2	9.1	9.5
Italy	Share	7.6	7.4	7.7
Netherlands	Share	2.8	5.5	3.4
Belgium	Share	2.2	1.8	2.4
Finland	Share	2.1	1.6	1.7
Singapore	Share	1.6	1.5	1.3
India	Share	0.5	0.9	1.1
Canada	Share	0.5	1.5	0.8
All other exporters	Share	32.7	29.4	25.2
All reporting exporters	Share	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 842649 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed April 21, 2025.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". United States is shown at the top followed by the countries under investigation, all remaining top exporting countries in descending order of 2020 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 15989, April 16, 2025	Lattice-Boom Crawler Cranes (LBCCs) From Japan; Institution of Antidumping Duty Investigation and Scheduling of Preliminary Phase Investigation	https://www.govinfo.gov/app/details/FR-2025-04-16/2025-06451
90 FR 19270, April 30, 2025	Lattice Boom Crawler Cranes From Japan: Initiation of Less-Than-Fair-Value Investigation	https://www.govinfo.gov/app/details/FR-2025-05-07/2025-07897

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: Lattice-Boom Crawler Cranes (LBCCS) from Japan

Inv. No.: 731-TA-1742 (Preliminary)

Date and Time: May 1, 2025 – 9:30 a.m.

Sessions were held in connection with this preliminary phase investigation all virtually via Webex.

OPENING REMARKS:

In Support of Imposition (**Roop K. Bhatti,** Cassidy Levy Kent LLP)
In Opposition to Imposition (**Julia K. Eppard,** Akin Gump Strauss Hauer & Feld LLP)

In Support of the Imposition of the Antidumping Duty Orders:

Cassidy Levy Kent LLP
Washington, DC
on behalf of

The Manitowoc Company, Inc.
MGX Equipment Services, LLC

Leslie Middleton, Executive Vice President, Americas and EU Mobile Cranes, The Manitowoc Company, Inc.

David Hull, Senior Vice President, Mobile Sales, Americas and EU, The Manitowoc Company, Inc.

Andrew Konkle, Senior Value Stream Director – Crawler Cranes, The Manitowoc Company, Inc.

In Support of the Imposition of the
Antidumping Duty Orders (continued):

Keith Poff, Vice President & General Manager, U.S. Distribution, MGX Equipment Services, LLC

Myles S. Getlan	)
Thomas M. Beline	)
	) – OF COUNSEL
Roop K. Bhatti	)
Nicole Brunda	)

In Opposition to the Imposition of
Antidumping Duty Orders:

Akin Gump Strauss Hauer & Feld LLP
Washington, DC
on behalf of

Kobelco Construction Machinery U.S.A. Inc.
Kobelco Construction Machinery Co., Ltd.

James Hodges, General Manager, Kobelco Construction Machinery U.S.A. Inc.

Takashi Yanagisawa, Sales Coordinator, Kobelco Construction Machinery U.S.A. Inc.

Travis Pope, Principal, Capital Trade, Inc.

Yujin K. McNamara	)
Julia K. Eppard	) – OF COUNSEL
Sydney L. Stringer	)

In Opposition of the Imposition of the
Antidumping Duty Orders (continued):

Barnes & Thornburg LLP
Washington, DC
on behalf of

Link-Belt Cranes Inc.

Richard Shultz, Vice President of Manufacturing, Link-Belt Cranes Inc.

Pat Collins, Director of Sales, Link-Belt Cranes Inc.

Adetayo Osuntogun)
Luis Arandia)
Yusra Siddique) – OF COUNSEL
Hendricks Valenzuela)
Michelle Rosario)

Hogan Lovells LLP
Washington, DC
on behalf of

Sumitomo Heavy Industries Construction Cranes Co., Ltd.

Jared R. Wessel)
) – OF COUNSEL
Michael G. Jacobson)

REBUTTAL/CLOSING REMARKS:

In Support of Imposition (**Myles S. Getlan**, Cassidy Levy Kent LLP)
In Opposition to Imposition (**Michael Jacobson,** Hogan Lovells LLP)

APPENDIX C

SUMMARY DATA

U.S. producers

Table C.1

LBCCs: Summary data concerning the U.S. market defining the domestic industry to be U.S. producer Manitowoc, by item and period

Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=1,000 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. consumption quantity:						
Amount	***	***	***	▲***	▲***	▲***
Producers' share (fn1)	***	***	***	▼***	▲***	▼***
Importers' share (fn1):						
Japan	***	***	***	▲***	▲***	▲***
Nonsubject sources	***	***	***	▼***	▼***	▼***
All import sources	***	***	***	▲***	▼***	▲***
U.S. importers' U.S. shipments of imports from:						
Japan:						
Quantity	***	***	***	▲***	▲***	▲***
Value	***	***	***	▲***	▲***	▲***
Unit value	***	***	***	▲***	▲***	▲***
Ending inventory quantity	***	***	***	▲***	▲***	▼***
Nonsubject sources:						
Quantity	***	***	***	▲***	▼***	▲***
Ending inventory quantity	***	***	***	▲***	***	▲***
All import sources:						
Quantity	***	***	***	▲***	▲***	▲***
Ending inventory quantity	***	***	***	▲***	▲***	▼***
U.S. producers':						
Practical capacity quantity	***	***	***	***	***	***
Production quantity	***	***	***	▲***	▲***	▲***
Capacity utilization (fn1)	***	***	***	▲***	▲***	▲***
U.S. shipments:						
Quantity	***	***	***	▲***	▲***	▲***
Value	***	***	***	▲***	▲***	▲***
Unit value	***	***	***	▼***	▼***	▼***
Export shipments:						
Quantity	***	***	***	▲***	▲***	▼***
Value	***	***	***	▲***	▲***	▼***
Unit value	***	***	***	▲***	▲***	▼***
Ending inventory quantity	***	***	***	▼***	▼***	***
Inventories/total shipments (fn1)	***	***	***	▼***	▼***	***
Production workers	***	***	***	▲***	▲***	▲***
Hours worked (1,000s)	***	***	***	▲***	▲***	▲***
Wages paid ($1,000)	***	***	***	▲***	▲***	▲***
Hourly wages (dollars per hour)	***	***	***	▲***	▲***	▲***
Productivity (units per million hours)	***	***	***	▲***	▲***	▲***
Unit labor costs	***	***	***	▼***	▼***	▼***

Table continued.

Table C.1 Continued

LBCCs: Summary data concerning the U.S. market defining the domestic industry to be U.S. producer Manitowoc, by item and period

Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=1,000 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':						
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.

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

fn1.--Reported data are in percent and period changes are in percentage points.
fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

U.S. producers and U.S. processors

Table C.2

LBCCs: Summary data concerning the U.S. market defining the domestic industry to be U.S. producer Manitowoc and U.S. processor Link-Belt, by item and period

Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=1,000 dollars per unit; Productivity=units per million hours; 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' and processors':						
Producers: Practical capacity quantity	***	***	***	***	***	***
Producers: Production quantity	***	***	***	▲***	▲***	▲***
Producers: Capacity utilization (fn1)	***	***	***	▲***	▲***	▲***
Processors: Practical capacity quantity	***	***	***	▼***	▼***	▲***
Processors: Production quantity	***	***	***	▼***	▼***	▲***
Processors: Capacity utilization (fn1)	***	***	***	▼***	▼***	▼***
U.S. shipments (fn2):						
Quantity	***	***	***	▲***	▲***	▲***
Value:						
Fully domestic value:	***	***	***	▲***	▲***	▲***
Incremental value added to imports	***	***	***	▲***	▼***	▲***
Total value	***	***	***	▲***	▲***	▲***
Unit value	***	***	***	▼***	▼***	▼***
Export shipments:						
Quantity	***	***	***	▲***	▲***	▼***
Value	***	***	***	▲***	▲***	▼***
Unit value	***	***	***	▲***	▲***	▼***
Producers: Ending inventory quantity	***	***	***	▼***	▼***	***
Producers: Inv./total shipments (fn1)	***	***	***	▼***	▼***	***
Processors: Ending inventory quantity	***	***	***	▼***	▼***	▲***
Processors: Inv./total shipments (fn1)	***	***	***	▼***	▼***	▲***
Production workers	***	***	***	▲***	▲***	▲***
Hours worked (1,000s)	***	***	***	▲***	▲***	▲***
Wages paid ($1,000)	***	***	***	▲***	▲***	▲***
Hourly wages (dollars per hour)	***	***	***	▲***	▲***	▲***
Producers: Productivity	***	***	***	▲***	▲***	▲***
Producers: Unit labor costs	***	***	***	▼***	▼***	▼***
Processors: Productivity	***	***	***	▼***	▼***	▲***
Processors: Unit labor costs	***	***	***	▲***	▲***	▼***

Table continued.

Table C.2 Continued
LBCCs: Summary data concerning the U.S. market defining the domestic industry to be U.S. producer Manitowoc and U.S. processor Link-Belt, by item and period

Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=1,000 dollars per unit; Productivity=units per million hours; 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':						
Net sales:						
Quantity	***	***	***	▲***	▲***	▲***
Value	***	***	***	▲***	▲***	▲***
Unit value	***	***	***	▼***	▼***	▼***
Cost of goods sold (COGS)	***	***	***	▲***	▲***	▲***
Gross profit or (loss) (fn3)	***	***	***	▲***	▲***	▲***
SG&A expenses	***	***	***	▲***	▲***	▲***
Operating income or (loss) (fn3)	***	***	***	▲***	▼***	▲***
Net income or (loss) (fn3)	***	***	***	▲***	▼***	▲***
Unit COGS	***	***	***	▼***	▼***	▼***
Unit SG&A expenses	***	***	***	▼***	▼***	▲***
Unit operating income or (loss) (fn3)	***	***	***	▲***	▲***	▲***
Unit net income or (loss) (fn3)	***	***	***	▲***	▲***	▲***
COGS/sales (fn1)	***	***	***	▼***	▼***	▼***
Operating income or (loss)/sales (fn1)	***	***	***	▲***	▲***	▲***
Net income or (loss)/sales (fn1)	***	***	***	▲***	▲***	▲***
Capital expenditures	***	***	***	▲***	▲***	▼***
Research and development expenses	***	***	***	▲***	▼***	▲***
Total assets	***	***	***	▲***	▲***	▼***
U.S. processors':						
Net sales:						
Quantity	***	***	***	▼***	▼***	▲***
Value	***	***	***	▲***	▼***	▲***
Unit value	***	***	***	▲***	▲***	▲***
Cost of goods sold (COGS)	***	***	***	▲***	▼***	▲***
Gross profit or (loss) (fn3)	***	***	***	▲***	▼***	▲***
SG&A expenses	***	***	***	▲***	▲***	▲***
Operating income or (loss) (fn3)	***	***	***	▲***	▼***	▲***
Net income or (loss) (fn3)	***	***	***	▲***	▼***	▲***
Unit COGS	***	***	***	▲***	▲***	▲***
Unit SG&A expenses	***	***	***	▲***	▲***	▼***
Unit operating income or (loss) (fn3)	***	***	***	▲***	▲***	▲***
Unit net income or (loss) (fn3)	***	***	***	▲***	▲***	▲***
COGS/sales (fn1)	***	***	***	▼***	▼***	▼***
Operating income or (loss)/sales (fn1)	***	***	***	▲***	▲***	▲***
Net income or (loss)/sales (fn1)	***	***	***	▲***	▲***	▲***
Capital expenditures	***	***	***	▲***	▲***	▼***
Research and development expenses	***	***	***	▲***	▲***	▼***
Total assets	***	***	***	▲***	▲***	▲***

Table C.2 Continued
LBCCs: Summary data concerning the U.S. market defining the domestic industry to be U.S. producer Manitowoc and U.S. processor Link-Belt, by item and period

Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=1,000 dollars per unit; Productivity=units per million hours; 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' and processors':						
Net sales:						
Quantity	***	***	***	▲***	▼***	▲***
Value	***	***	***	▲***	▲***	▲***
Unit value	***	***	***	▲***	▲***	▲***
Cost of goods sold (COGS)	***	***	***	▲***	▲***	▲***
Gross profit or (loss) (fn3)	***	***	***	▲***	▼***	▲***
SG&A expenses	***	***	***	▲***	▲***	▲***
Operating income or (loss) (fn3)	***	***	***	▲***	▼***	▲***
Net income or (loss) (fn3)	***	***	***	▲***	▼***	▲***
Unit COGS	***	***	***	▲***	▲***	▼***
Unit SG&A expenses	***	***	***	▲***	▲***	▼***
Unit operating income or (loss) (fn3)	***	***	***	▲***	▼***	▲***
Unit net income or (loss) (fn3)	***	***	***	▲***	▼***	▲***
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.

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

fn1.--Reported data are in percent and period changes are in percentage points.
fn2.--Quantity for U.S. shipments reflects U.S. producers' U.S. shipment quantities. Value for U.S. shipments reflects LBCCs sold in the United States from domestically manufactured LBCCs (including the value added by U.S. processors to domestic LBCCs), as well as the incremental value added by U.S. processors to imported LBCCs. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported as an import. Unit value reflects the fully domestic value.
fn3.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

APPENDIX D

SEMI-FINISHED PRODUCT ANALYSIS NARRATIVE RESPONSES

Table D.1 LBCCs: U.S. producers' narrative responses regarding the semi-finished product analysis comparing finished cranes to cranes subassemblies

Factor	Producer name and narrative regarding semi-finished product analysis
Differences in characteristics	***
Differences in characteristics	***
Differences in cost	***
Differences in cost	***
Transformation intensive	***

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

Table D.2 LBCCs: U.S. importers' narrative responses regarding the semi-finished product analysis comparing finished cranes to cranes subassemblies

Factor	Importer name and narrative regarding semi-finished product analysis
Differences in characteristics	***
Differences in characteristics	***
Differences in cost	***
Transformation intensive	***

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

APPENDIX E

DETAILED SHIPMENT/IMPORT DATA BY PRODUCT TYPE

Table E.1 LBCCs: U.S. producer Manitowoc's U.S. shipments of LBCCs, by product type and period

Quantity in units; Value in 1,000 dollars; Unit values in dollars per unit; Shares in percent

Product grouping	Product type	Measure	2022	2023	2024
Complete units	70 to 250 ST max load capacity	Quantity	***	***	***
Complete units	251 to 500 ST max load capacity	Quantity	***	***	***
Complete units	501 to 750 ST max load capacity	Quantity	***	***	***
Complete units	All other max load capacities	Quantity	***	***	***
Complete units	All complete units	Quantity	***	***	***
Subassemblies	Carriage-related subassemblies	Quantity	***	***	***
Subassemblies	Other subassemblies	Quantity	***	***	***
Subassemblies	All subassemblies	Quantity	***	***	***
All in-scope products	All LBCCs	Quantity	***	***	***
Complete units	70 to 250 ST max load capacity	Value	***	***	***
Complete units	251 to 500 ST max load capacity	Value	***	***	***
Complete units	501 to 750 ST max load capacity	Value	***	***	***
Complete units	All other max load capacities	Value	***	***	***
Complete units	All complete units	Value	***	***	***
Subassemblies	Carriage-related subassemblies	Value	***	***	***
Subassemblies	Other subassemblies	Value	***	***	***
Subassemblies	All subassemblies	Value	***	***	***
All in-scope products	All LBCCs	Value	***	***	***
Complete units	70 to 250 ST max load capacity	Unit value	***	***	***
Complete units	251 to 500 ST max load capacity	Unit value	***	***	***
Complete units	501 to 750 ST max load capacity	Unit value	***	***	***
Complete units	All other max load capacities	Unit value	***	***	***
Complete units	All complete units	Unit value	***	***	***
Subassemblies	Carriage-related subassemblies	Unit value	***	***	***
Subassemblies	Other subassemblies	Unit value	***	***	***
Subassemblies	All subassemblies	Unit value	***	***	***
All in-scope products	All LBCCs	Unit value	***	***	***

Table continued.

Table E.1 (Continued) LBCCs: U.S. producer Manitowoc's U.S. shipments of LBCCs, by product type and period

Shares in percent

Product grouping	Product type	Measure	2022	2023	2024
Complete units	70 to 250 ST max load capacity	Share of quantity	***	***	***
Complete units	251 to 500 ST max load capacity	Share of quantity	***	***	***
Complete units	501 to 750 ST max load capacity	Share of quantity	***	***	***
Complete units	All other max load capacities	Share of quantity	***	***	***
Complete units	All complete units	Share of quantity	***	***	***
Subassemblies	Carriage-related subassemblies	Share of quantity	***	***	***
Subassemblies	Other subassemblies	Share of quantity	***	***	***
Subassemblies	All subassemblies	Share of quantity	***	***	***
All in-scope products	All LBCCs	Share of quantity	***	***	***
Complete units	70 to 250 ST max load capacity	Share of value	***	***	***
Complete units	251 to 500 ST max load capacity	Share of value	***	***	***
Complete units	501 to 750 ST max load capacity	Share of value	***	***	***
Complete units	All other max load capacities	Share of value	***	***	***
Complete units	All complete units	Share of value	***	***	***
Subassemblies	Carriage-related subassemblies	Share of value	***	***	***
Subassemblies	Other subassemblies	Share of value	***	***	***
Subassemblies	All subassemblies	Share of value	***	***	***
All in-scope products	All LBCCs	Share of value	***	***	***

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

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

Table E.2 LBCCs: U.S. processor Link-Belt's U.S. shipments of LBCCs, by product type and period

Quantity in units; Value in 1,000 dollars; Unit values in 1,000 dollars per units

Product grouping	Product type	Measure	2022	2023	2024
Complete units	70 to 250 ST max load capacity	Quantity	***	***	***
Complete units	251 to 500 ST max load capacity	Quantity	***	***	***
Complete units	501 to 750 ST max load capacity	Quantity	***	***	***
Complete units	All other max load capacities	Quantity	***	***	***
Complete units	All complete units	Quantity	***	***	***
Subassemblies	Carriage-related subassemblies	Quantity	***	***	***
Subassemblies	Other subassemblies	Quantity	***	***	***
Subassemblies	All subassemblies	Quantity	***	***	***
All in-scope products	All LBCCs	Quantity	***	***	***
Complete units	70 to 250 ST max load capacity	Value	***	***	***
Complete units	251 to 500 ST max load capacity	Value	***	***	***
Complete units	501 to 750 ST max load capacity	Value	***	***	***
Complete units	All other max load capacities	Value	***	***	***
Complete units	All complete units	Value	***	***	***
Subassemblies	Carriage-related subassemblies	Value	***	***	***
Subassemblies	Other subassemblies	Value	***	***	***
Subassemblies	All subassemblies	Value	***	***	***
All in-scope products	All LBCCs	Value	***	***	***
Complete units	70 to 250 ST max load capacity	Unit value	***	***	***
Complete units	251 to 500 ST max load capacity	Unit value	***	***	***
Complete units	501 to 750 ST max load capacity	Unit value	***	***	***
Complete units	All other max load capacities	Unit value	***	***	***
Complete units	All complete units	Unit value	***	***	***
Subassemblies	Carriage-related subassemblies	Unit value	***	***	***
Subassemblies	Other subassemblies	Unit value	***	***	***
Subassemblies	All subassemblies	Unit value	***	***	***
All in-scope products	All LBCCs	Unit value	***	***	***

Table continued.

Table E.2 (Continued) LBCCs: U.S. processor Link-Belt's U.S. shipments of LBCCs, by product type and period

Shares in percent

Product grouping	Product type	Measure	2022	2023	2024
Complete units	70 to 250 ST max load capacity	Share of quantity	***	***	***
Complete units	251 to 500 ST max load capacity	Share of quantity	***	***	***
Complete units	501 to 750 ST max load capacity	Share of quantity	***	***	***
Complete units	All other max load capacities	Share of quantity	***	***	***
Complete units	All complete units	Share of quantity	***	***	***
Subassemblies	Carriage-related subassemblies	Share of quantity	***	***	***
Subassemblies	Other subassemblies	Share of quantity	***	***	***
Subassemblies	All subassemblies	Share of quantity	***	***	***
All in-scope products	All LBCCs	Share of quantity	***	***	***
Complete units	70 to 250 ST max load capacity	Share of value	***	***	***
Complete units	251 to 500 ST max load capacity	Share of value	***	***	***
Complete units	501 to 750 ST max load capacity	Share of value	***	***	***
Complete units	All other max load capacities	Share of value	***	***	***
Complete units	All complete units	Share of value	***	***	***
Subassemblies	Carriage-related subassemblies	Share of value	***	***	***
Subassemblies	Other subassemblies	Share of value	***	***	***
Subassemblies	All subassemblies	Share of value	***	***	***
All in-scope products	All LBCCs	Share of value	***	***	***

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

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

Table E.3 LBCCs: U.S. importers' U.S. imports of LBCCs from Japan, by product type and period

Quantity in units; Value in 1,000 dollars; Unit values in 1,000 dollars per unit

Product grouping	Product type	Measure	2022	2023	2024
Complete units	70 to 250 ST max load capacity	Quantity	***	***	***
Complete units	251 to 500 ST max load capacity	Quantity	***	***	***
Complete units	501 to 750 ST max load capacity	Quantity	***	***	***
Complete units	All other max load capacities	Quantity	***	***	***
Complete units	All complete units	Quantity	***	***	***
Subassemblies	Carriage-related subassemblies	Quantity	***	***	***
Subassemblies	Other subassemblies	Quantity	***	***	***
Subassemblies	All subassemblies	Quantity	***	***	***
All in-scope products	All LBCCs	Quantity	***	***	***
Complete units	70 to 250 ST max load capacity	Value	***	***	***
Complete units	251 to 500 ST max load capacity	Value	***	***	***
Complete units	501 to 750 ST max load capacity	Value	***	***	***
Complete units	All other max load capacities	Value	***	***	***
Complete units	All complete units	Value	***	***	***
Subassemblies	Carriage-related subassemblies	Value	***	***	***
Subassemblies	Other subassemblies	Value	***	***	***
Subassemblies	All subassemblies	Value	***	***	***
All in-scope products	All LBCCs	Value	***	***	***
Complete units	70 to 250 ST max load capacity	Unit value	***	***	***
Complete units	251 to 500 ST max load capacity	Unit value	***	***	***
Complete units	501 to 750 ST max load capacity	Unit value	***	***	***
Complete units	All other max load capacities	Unit value	***	***	***
Complete units	All complete units	Unit value	***	***	***
Subassemblies	Carriage-related subassemblies	Unit value	***	***	***
Subassemblies	Other subassemblies	Unit value	***	***	***
Subassemblies	All subassemblies	Unit value	***	***	***
All in-scope products	All LBCCs	Unit value	***	***	***

Table continued.

Table E.3 (Continued) LBCCs: U.S. importers' U.S. imports of LBCCs from Japan, by product type and period

Shares in percent

Product grouping	Product type	Measure	2022	2023	2024
Complete units	70 to 250 ST max load capacity	Share of quantity	***	***	***
Complete units	251 to 500 ST max load capacity	Share of quantity	***	***	***
Complete units	501 to 750 ST max load capacity	Share of quantity	***	***	***
Complete units	All other max load capacities	Share of quantity	***	***	***
Complete units	All complete units	Share of quantity	***	***	***
Subassemblies	Carriage-related subassemblies	Share of quantity	***	***	***
Subassemblies	Other subassemblies	Share of quantity	***	***	***
Subassemblies	All subassemblies	Share of quantity	***	***	***
All in-scope products	All LBCCs	Share of quantity	***	***	***
Complete units	70 to 250 ST max load capacity	Share of value	***	***	***
Complete units	251 to 500 ST max load capacity	Share of value	***	***	***
Complete units	501 to 750 ST max load capacity	Share of value	***	***	***
Complete units	All other max load capacities	Share of value	***	***	***
Complete units	All complete units	Share of value	***	***	***
Subassemblies	Carriage-related subassemblies	Share of value	***	***	***
Subassemblies	Other subassemblies	Share of value	***	***	***
Subassemblies	All subassemblies	Share of value	***	***	***
All in-scope products	All LBCCs	Share of value	***	***	***

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

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

Table E.4 LBCCs: U.S. importers' U.S. imports of LBCCs from nonsubject sources, by product type and period

Quantity in units; Value in 1,000 dollars; Unit values in 1,000 dollars per unit

Product grouping	Product type	Measure	2022	2023	2024
Complete units	70 to 250 ST max load capacity	Quantity	***	***	***
Complete units	251 to 500 ST max load capacity	Quantity	***	***	***
Complete units	501 to 750 ST max load capacity	Quantity	***	***	***
Complete units	All other max load capacities	Quantity	***	***	***
Complete units	All complete units	Quantity	***	***	***
Subassemblies	Carriage-related subassemblies	Quantity	***	***	***
Subassemblies	Other subassemblies	Quantity	***	***	***
Subassemblies	All subassemblies	Quantity	***	***	***
All in-scope products	All LBCCs	Quantity	***	***	***
Complete units	70 to 250 ST max load capacity	Value	***	***	***
Complete units	251 to 500 ST max load capacity	Value	***	***	***
Complete units	501 to 750 ST max load capacity	Value	***	***	***
Complete units	All other max load capacities	Value	***	***	***
Complete units	All complete units	Value	***	***	***
Subassemblies	Carriage-related subassemblies	Value	***	***	***
Subassemblies	Other subassemblies	Value	***	***	***
Subassemblies	All subassemblies	Value	***	***	***
All in-scope products	All LBCCs	Value	***	***	***
Complete units	70 to 250 ST max load capacity	Unit value	***	***	***
Complete units	251 to 500 ST max load capacity	Unit value	***	***	***
Complete units	501 to 750 ST max load capacity	Unit value	***	***	***
Complete units	All other max load capacities	Unit value	***	***	***
Complete units	All complete units	Unit value	***	***	***
Subassemblies	Carriage-related subassemblies	Unit value	***	***	***
Subassemblies	Other subassemblies	Unit value	***	***	***
Subassemblies	All subassemblies	Unit value	***	***	***
All in-scope products	All LBCCs	Unit value	***	***	***

Table continued.

Table E.4 (Continued) LBCCs: U.S. importers' U.S. imports of LBCCs from nonsubject sources, by product type and period

Shares in percent

Product grouping	Product type	Measure	2022	2023	2024
Complete units	70 to 250 ST max load capacity	Share of quantity	***	***	***
Complete units	251 to 500 ST max load capacity	Share of quantity	***	***	***
Complete units	501 to 750 ST max load capacity	Share of quantity	***	***	***
Complete units	All other max load capacities	Share of quantity	***	***	***
Complete units	All complete units	Share of quantity	***	***	***
Subassemblies	Carriage-related subassemblies	Share of quantity	***	***	***
Subassemblies	Other subassemblies	Share of quantity	***	***	***
Subassemblies	All subassemblies	Share of quantity	***	***	***
All in-scope products	All LBCCs	Share of quantity	***	***	***
Complete units	70 to 250 ST max load capacity	Share of value	***	***	***
Complete units	251 to 500 ST max load capacity	Share of value	***	***	***
Complete units	501 to 750 ST max load capacity	Share of value	***	***	***
Complete units	All other max load capacities	Share of value	***	***	***
Complete units	All complete units	Share of value	***	***	***
Subassemblies	Carriage-related subassemblies	Share of value	***	***	***
Subassemblies	Other subassemblies	Share of value	***	***	***
Subassemblies	All subassemblies	Share of value	***	***	***
All in-scope products	All LBCCs	Share of value	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “—". The imports in 2022 and 2023 were reexported.

Table E.5 LBCCs: U.S. importers' U.S. imports of LBCCs from all import sources, by product type and period

Quantity in units; Value in 1,000 dollars; Unit values in 1,000 dollars per unit

Product grouping	Product type	Measure	2022	2023	2024
Complete units	70 to 250 ST max load capacity	Quantity	***	***	***
Complete units	251 to 500 ST max load capacity	Quantity	***	***	***
Complete units	501 to 750 ST max load capacity	Quantity	***	***	***
Complete units	All other max load capacities	Quantity	***	***	***
Complete units	All complete units	Quantity	***	***	***
Subassemblies	Carriage-related subassemblies	Quantity	***	***	***
Subassemblies	Other subassemblies	Quantity	***	***	***
Subassemblies	All subassemblies	Quantity	***	***	***
All in-scope products	All LBCCs	Quantity	***	***	***
Complete units	70 to 250 ST max load capacity	Value	***	***	***
Complete units	251 to 500 ST max load capacity	Value	***	***	***
Complete units	501 to 750 ST max load capacity	Value	***	***	***
Complete units	All other max load capacities	Value	***	***	***
Complete units	All complete units	Value	***	***	***
Subassemblies	Carriage-related subassemblies	Value	***	***	***
Subassemblies	Other subassemblies	Value	***	***	***
Subassemblies	All subassemblies	Value	***	***	***
All in-scope products	All LBCCs	Value	***	***	***
Complete units	70 to 250 ST max load capacity	Unit value	***	***	***
Complete units	251 to 500 ST max load capacity	Unit value	***	***	***
Complete units	501 to 750 ST max load capacity	Unit value	***	***	***
Complete units	All other max load capacities	Unit value	***	***	***
Complete units	All complete units	Unit value	***	***	***
Subassemblies	Carriage-related subassemblies	Unit value	***	***	***
Subassemblies	Other subassemblies	Unit value	***	***	***
Subassemblies	All subassemblies	Unit value	***	***	***
All in-scope products	All LBCCs	Unit value	***	***	***

Table continued.

Table E.5 (Continued) LBCCs: U.S. importers' U.S. imports of LBCCs from all import sources, by product type and period

Shares in percent

Product grouping	Product type	Measure	2022	2023	2024
Complete units	70 to 250 ST max load capacity	Share of quantity	***	***	***
Complete units	251 to 500 ST max load capacity	Share of quantity	***	***	***
Complete units	501 to 750 ST max load capacity	Share of quantity	***	***	***
Complete units	All other max load capacities	Share of quantity	***	***	***
Complete units	All complete units	Share of quantity	***	***	***
Subassemblies	Carriage-related subassemblies	Share of quantity	***	***	***
Subassemblies	Other subassemblies	Share of quantity	***	***	***
Subassemblies	All subassemblies	Share of quantity	***	***	***
All in-scope products	All LBCCs	Share of quantity	***	***	***
Complete units	70 to 250 ST max load capacity	Share of value	***	***	***
Complete units	251 to 500 ST max load capacity	Share of value	***	***	***
Complete units	501 to 750 ST max load capacity	Share of value	***	***	***
Complete units	All other max load capacities	Share of value	***	***	***
Complete units	All complete units	Share of value	***	***	***
Subassemblies	Carriage-related subassemblies	Share of value	***	***	***
Subassemblies	Other subassemblies	Share of value	***	***	***
Subassemblies	All subassemblies	Share of value	***	***	***
All in-scope products	All LBCCs	Share of value	***	***	***

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

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

Table E.6 LBCCs: U.S. producer Manitowoc's U.S shipments and U.S importers' U.S. imports of LBCCs from all souces, by product type and period

Quantity in units; Value in 1,000 dollars; Unit values in 1,000 dollars per unit

Product grouping	Product type	Measure	2022	2023	2024
Complete units	70 to 250 ST max load capacity	Quantity	***	***	***
Complete units	251 to 500 ST max load capacity	Quantity	***	***	***
Complete units	501 to 750 ST max load capacity	Quantity	***	***	***
Complete units	All other max load capacities	Quantity	***	***	***
Complete units	All complete units	Quantity	***	***	***
Subassemblies	Carriage-related subassemblies	Quantity	***	***	***
Subassemblies	Other subassemblies	Quantity	***	***	***
Subassemblies	All subassemblies	Quantity	***	***	***
All in-scope products	All LBCCs	Quantity	***	***	***
Complete units	70 to 250 ST max load capacity	Value	***	***	***
Complete units	251 to 500 ST max load capacity	Value	***	***	***
Complete units	501 to 750 ST max load capacity	Value	***	***	***
Complete units	All other max load capacities	Value	***	***	***
Complete units	All complete units	Value	***	***	***
Subassemblies	Carriage-related subassemblies	Value	***	***	***
Subassemblies	Other subassemblies	Value	***	***	***
Subassemblies	All subassemblies	Value	***	***	***
All in-scope products	All LBCCs	Value	***	***	***
Complete units	70 to 250 ST max load capacity	Unit value	***	***	***
Complete units	251 to 500 ST max load capacity	Unit value	***	***	***
Complete units	501 to 750 ST max load capacity	Unit value	***	***	***
Complete units	All other max load capacities	Unit value	***	***	***
Complete units	All complete units	Unit value	***	***	***
Subassemblies	Carriage-related subassemblies	Unit value	***	***	***
Subassemblies	Other subassemblies	Unit value	***	***	***
Subassemblies	All subassemblies	Unit value	***	***	***
All in-scope products	All LBCCs	Unit value	***	***	***

Table E.6 (Continued) LBCCs: U.S. producer Manitowoc's U.S shipments and U.S importers' U.S. imports of LBCCs from all sources, by product type and period

Shares in percent

Product grouping	Product type	Measure	2022	2023	2024
Complete units	70 to 250 ST max load capacity	Share of quantity	***	***	***
Complete units	251 to 500 ST max load capacity	Share of quantity	***	***	***
Complete units	501 to 750 ST max load capacity	Share of quantity	***	***	***
Complete units	All other max load capacities	Share of quantity	***	***	***
Complete units	All complete units	Share of quantity	***	***	***
Subassemblies	Carriage-related subassemblies	Share of quantity	***	***	***
Subassemblies	Other subassemblies	Share of quantity	***	***	***
Subassemblies	All subassemblies	Share of quantity	***	***	***
All in-scope products	All LBCCs	Share of quantity	***	***	***
Complete units	70 to 250 ST max load capacity	Share of value	***	***	***
Complete units	251 to 500 ST max load capacity	Share of value	***	***	***
Complete units	501 to 750 ST max load capacity	Share of value	***	***	***
Complete units	All other max load capacities	Share of value	***	***	***
Complete units	All complete units	Share of value	***	***	***
Subassemblies	Carriage-related subassemblies	Share of value	***	***	***
Subassemblies	Other subassemblies	Share of value	***	***	***
Subassemblies	All subassemblies	Share of value	***	***	***
All in-scope products	All LBCCs	Share of value	***	***	***

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

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

Table E.7 Complete LBCCs: Apparent U.S. consumption and market shares classifying U.S processor Link-Belt's U.S shipments as subject origin (Japan) product based on quantity data, by source and period

Quantity in units; Shares in percent

Source	Measure	2022	2023	2024
U.S. producers	Quantity	***	***	***
Japan	Quantity	***	***	***
Nonsubject sources	Quantity	***	***	***
All import sources	Quantity	***	***	***
All sources	Quantity	***	***	***
U.S. producers	Share	***	***	***
Japan	Share	***	***	***
Nonsubject sources	Share	***	***	***
All import sources	Share	***	***	***
All sources	Share	***	***	***

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

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

Table E.8 Complete LBCCs: Apparent U.S. consumption and market shares classifying U.S processor Link-Belt's U.S shipments as subject origin (Japan) product based on quantity data, by source and period

Quantity in units; Shares in percent

Source	Measure	2022	2023	2024
U.S. producers	Quantity	***	***	***
Japan	Quantity	***	***	***
Nonsubject sources	Quantity	***	***	***
All import sources	Quantity	***	***	***
All sources	Quantity	***	***	***
U.S. producers	Share	***	***	***
Japan	Share	***	***	***
Nonsubject sources	Share	***	***	***
All import sources	Share	***	***	***
All sources	Share	***	***	***

Table E.9 LBCCs subassemblies: Apparent U.S. 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	***	***	***
Japan	Quantity	***	***	***
Nonsubject sources	Quantity	***	***	***
All import sources	Quantity	***	***	***
All sources	Quantity	***	***	***
U.S. producers	Share	***	***	***
Japan	Share	***	***	***
Nonsubject sources	Share	***	***	***
All import sources	Share	***	***	***
All sources	Share	***	***	***

APPENDIX F

LINK-BELT PRICE DATA AS IMPORT SOURCE

U.S. processor and importer Link-Belt provided quarterly sales data for its LBCCs that are made with imported crawler assembles and domestically produced lattice booms.[1] Quarterly price data with Link-Belt's price data categorized as an importer of LBCCs from Japan are presented in tables F.1 to F.3 and figures F.1 to F.3. Price trends are presented in table F.4, and underselling/overselling margin calculations are presented in F.5 to F.6.

[1] Conference transcript, p. 112 and p. 119 (Schultz).

Table F.1 LBCCs: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, and margins of underselling/(overselling), treating Link-Belt as an import source, by source and quarter

Price in 1,000 dollars per unit, quantity in units.

Period	U.S. producer price	U.S. producer quantity	Japan price	Japan quantity	Japan 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: Lattice boom crawler crane with a maximum lift capacity of 110 U.S. tons, boom length of 140-160 ft, with a base engine and model configuration, and without any jib or other attachments.

Table F.2 LBCCs: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), treating Link-Belt as an import source, by source and quarter

Price in 1,000 dollars per unit, quantity in units, margin in percent.

Period	U.S. price	U.S. quantity	Japan price	Japan quantity	Japan 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: Lattice boom crawler crane with a maximum lift capacity of 200 U.S. tons, boom length of 200-220 ft, with a base engine and model configuration, and without any jib or other attachments.

Table F.3 LBCCs: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), treating Link-Belt as an import source, by source and quarter

Price in 1,000 dollars per unit, quantity in units, margin in percent.

Period	U.S. price	U.S. quantity	Japan price	Japan quantity	Japan 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: Lattice boom crawler crane with a maximum lift capacity of 275 U.S. tons, boom length of 215-235 ft, with a base engine and model configuration, and without any jib or other attachments.

Figure F.1 Product: Weighted-average prices and quantities of domestic and imported product 1 treating Link-Belt as an import source, by quarter

Price of product 1

* * * * * * *

Volume of product 1

* * * * * * *

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

Note: Product 1: Lattice boom crawler crane with a maximum lift capacity of 110 U.S. tons, boom length of 140-160 ft, with a base engine and model configuration, and without any jib or other attachments.

Figure F.2 Product: Weighted-average prices and quantities of domestic and imported product 2 treating Link-Belt as an import source, by quarter

Price of product 2

* * * * * * *

Volume of product 2

* * * * * * *

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

Note: Product 2: Lattice boom crawler crane with a maximum lift capacity of 200 U.S. tons, boom length of 200-220 ft, with a base engine and model configuration, and without any jib or other attachments.

Figure F.3 Product: Weighted-average prices and quantities of domestic and imported product 3 treating Link-Belt as an import source, by quarter

Price of product 3

* * * * * * *

Volume of product 3

* * * * * * *

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

Note: Product 3: Lattice boom crawler crane with a maximum lift capacity of 275 U.S. tons, boom length of 215-235 ft, with a base engine and model configuration, and without any jib or other attachments.

Table F.4 LBCCs: Summary of price data treating Link-Belt as an import source, by product and source, January 2022 to December 2024

Quantity in units, price in 1,000 dollars per unit

Product	Source	Number of quarters	Quantity of shipments	Low price	High price	First quarter price	Last quarter price	Percent change in price over period
Product 1	U.S. producer	10	***	***	***	***	***	***
Product 1	Japan	8	***	***	***	***	***	***
Product 2	U.S. producer	—	***	***	***	***	***	***
Product 2	Japan	5	***	***	***	***	***	***
Product 3	U.S. producer	9	***	***	***	***	***	***
Product 3	Japan	1	***	***	***	***	***	***

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

Note: Percent change column is percentage change from the first quarter 2022 to the last quarter in 2024.

Table F.5 LBCCs: Instances of underselling and overselling and the range and average of margins treating Link-Belt as an import source, by product

Quantity in units; margin in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	***	***	***	***	***
Product 2	Underselling	***	***	***	***	***
Product 3	Underselling	***	***	***	***	***
Total, all products	Underselling	8	***	***	***	***
Product 1	Overselling	***	***	***	***	***
Product 2	Overselling	***	***	***	***	***
Product 3	Overselling	***	***	***	***	***
Total, all products	Overselling	11	***	***	***	***

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Table F.6 LBCCs: Instances of underselling and overselling and the range and average of margins treating Link-Belt as an import source, by year

Quantity in units; margin in percent

Year	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
2022	Underselling	***	***	***	***	***
2023	Underselling	***	***	***	***	***
2024	Underselling	***	***	***	***	***
Total, all years	Underselling	8	***	***	***	***
2022	Overselling	***	***	***	***	***
2023	Overselling	***	***	***	***	***
2024	Overselling	***	***	***	***	***
Total, all years	Overselling	11	***	***	***	***

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

APPENDIX G

LINK-BELT PRICE DATA AS U.S. PRODUCER SOURCE

U.S. processor and importer Link-Belt provided quarterly sales data for its LBCCs that are made with imported crawler assembles and domestically produced lattice booms.[1] Quarterly price data with Link-Belt's price data categorized as a U.S. producer of LBCCs are presented in tables G.1 to G.3 and figures G.1 to G.3. Price trends are presented in table G.4, and underselling/overselling margin calculations are presented in G.5 to G.6.

[1] Conference transcript, p. 112 and p. 119 (Schultz).

Table G.1 LBCCs: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, and margins of underselling/(overselling), treating Link-Belt as a U.S. producer source, by source and quarter

Price in 1,000 dollars per unit, quantity in units.

Period	U.S. producer price	U.S. producer quantity	Japan price	Japan quantity	Japan 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: Lattice boom crawler crane with a maximum lift capacity of 110 U.S. tons, boom length of 140-160 ft, with a base engine and model configuration, and without any jib or other attachments.

Table G.2 LBCCs: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), treating Link-Belt as a U.S. producer source, by source and quarter

Price in 1,000 dollars per unit, quantity in units, margin in percent.

Period	U.S. price	U.S. quantity	Japan price	Japan quantity	Japan 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: Lattice boom crawler crane with a maximum lift capacity of 200 U.S. tons, boom length of 200-220 ft, with a base engine and model configuration, and without any jib or other attachments.

Table G.3 LBCCs: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), treating Link-Belt as a U.S. producer source, by source and quarter

Price in 1,000 dollars per unit, quantity in units, margin in percent.

Period	U.S. price	U.S. quantity	Japan price	Japan quantity	Japan 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: Lattice boom crawler crane with a maximum lift capacity of 275 U.S. tons, boom length of 215-235 ft, with a base engine and model configuration, and without any jib or other attachments.

Figure G.1 Product: Weighted-average prices and quantities of domestic and imported product 1 treating Link-Belt as a U.S. producer source, by quarter

Price of product 1

* * * * * * *

Volume of product 1

* * * * * * *

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

Note: Product 1: Lattice boom crawler crane with a maximum lift capacity of 110 U.S. tons, boom length of 140-160 ft, with a base engine and model configuration, and without any jib or other attachments.

Figure G.2 Product: Weighted-average prices and quantities of domestic and imported product 2 treating Link-Belt as a U.S. producer source, by quarter

Price of product 2

* * * * * * *

Volume of product 2

* * * * * * *

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

Note: Product 2: Lattice boom crawler crane with a maximum lift capacity of 200 U.S. tons, boom length of 200-220 ft, with a base engine and model configuration, and without any jib or other attachments.

Figure G.3 Product: Weighted-average prices and quantities of domestic and imported product 3 treating Link-Belt as a U.S. producer source, by quarter

Price of product 3

* * * * * * *

Volume of product 3

* * * * * * *

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

Note: Product 3: Lattice boom crawler crane with a maximum lift capacity of 275 U.S. tons, boom length of 215-235 ft, with a base engine and model configuration, and without any jib or other attachments.

Table G.4 LBCCs: Summary of price data treating Link-Belt as a U.S. producer, by product and source, January 2022 to December 2024

Quantity in units, price in 1,000 dollars per unit

Product	Source	Number of quarters	Quantity of shipments	Low price	High price	First quarter price	Last quarter price	Percent change in price over period
Product 1	U.S. producer	12	***	***	***	***	***	***
Product 1	Japan	8	***	***	***	***	***	***
Product 2	U.S. producer	12	***	***	***	***	***	***
Product 2	Japan	5	***	***	***	***	***	***
Product 3	U.S. producer	12	***	***	***	***	***	***
Product 3	Japan	1	***	***	***	***	***	***

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

Note: Percent change column is percentage change from the first quarter 2022 to the last quarter in 2024.

Table G.5 LBCCs: Instances of underselling and overselling and the range and average of margins treating Link-Belt as a U.S. producer, by product

Quantity in units; margin in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	***	***	***	***	***
Product 2	Underselling	***	***	***	***	***
Product 3	Underselling	***	***	***	***	***
Total, all products	Underselling	9	***	***	***	***
Product 1	Overselling	***	***	***	***	***
Product 2	Overselling	***	***	***	***	***
Product 3	Overselling	***	***	***	***	***
Total, all products	Overselling	5	***	***	***	***

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Table G.6 LBCCs: Instances of underselling and overselling and the range and average of margins treating Link-Belt as a U.S. producer, by year

Quantity in units; margin in percent

Year	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
2022	Underselling	***	***	***	***	***
2023	Underselling	***	***	***	***	***
2024	Underselling	***	***	***	***	***
Total, all years	Underselling	9	***	***	***	***
2022	Overselling	***	***	***	***	***
2023	Overselling	***	***	***	***	***
2024	Overselling	***	***	***	***	***
Total, all years	Overselling	5	***	***	***	***

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.