Aluminum Wire and Cable from China

Investigation Nos. 701-TA-611 and 731-TA-1428 (Review)



Washington, DC 20436

U.S. International Trade Commission

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Publication 5635

CONTENTS

Page

Determination(s)	1
Views of the Commission	
Information obtained in these reviews	
Background	
The original investigations	
Previous and related investigations	
Commerce's five-year reviews	
The product	
Commerce's scope	
U.S. tariff treatment	
Description and uses	
Manufacturing process	
The industry in the United States	
U.S. producers	
Recent developments	
U.S. producers' trade and financial data	
Definitions of the domestic like product and domestic industry	
U.S. importers	
U.S. imports	
Apparent U.S. consumption and market shares	
The industry in China	
Producers in China	
Recent developments	
Exports	
Third-country trade actions	
The global market	

CONTENTS

Page

Appendixes

A. Federal Register notices	A.1
B. Responses to notice of institution	B.1
C. Summary data compiled in prior proceedings	C.1
D. Purchaser questionnaire responses	D.1

Note.—Information that would reveal confidential operations of individual firms may not be published.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

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-611 and 731-TA-1428 (Review)

Aluminum Wire and Cable from China

DETERMINATIONS

On the basis of the record¹ developed in the subject five-year reviews, the United States International Trade Commission ("Commission") determines, pursuant to the Tariff Act of 1930 ("the Act"), that revocation of the countervailing and antidumping duty orders on aluminum wire and cable from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

BACKGROUND

The Commission instituted these reviews on November 1, 2024 (89 FR 87401) and determined on February 4, 2025, that it would conduct expedited reviews (90 FR 11181, March 4, 2025).

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

Views of the Commission

Based on the record in these five-year reviews, we determine under section 751(c) of the Tariff Act of 1930, as amended ("the Tariff Act"), that revocation of the antidumping and countervailing duty orders on imports of aluminum wire and cable ("AWC") from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

I. Background

Original Investigations. The Commission instituted the original investigations on September 21, 2018, in response to petitions filed by Encore Wire Corporation ("Encore"), and Southwire Company, LLC ("Southwire"), domestic producers of AWC.¹ In December 2019, the Commission determined that an industry in the United States was materially injured by reason of imports of AWC from China that the U.S. Department of Commerce ("Commerce") found to be sold at less than fair value ("LTFV") and subsidized by the government of China.² Commerce issued antidumping and countervailing duty orders on imports of AWC from China on December 23, 2019.³

¹ Aluminum Wire and Cable from China, Inv. Nos. 701-TA-611 and 731-TA-1428 (Final), USITC Pub. 5001 (Dec. 2019) ("Original Determinations") at 3.

² Aluminum Wire and Cable from China; Determinations, 84 Fed. Reg. 70210 (Dec. 20, 2019)

³ Aluminum and Wire Cable from China: Antidumping and Countervailing Duty Orders, 84 Fed. Reg. 70496 (Dec. 23, 2019).

Current Reviews. The Commission instituted these first reviews on November 1, 2024.⁴ The Commission received responses to the notice of institution from Encore and Southwire.⁵ The Commission did not receive a response to the notice of institution from any respondent interested party. On February 4, 2025, the Commission determined that the domestic interested party group response to its notice of institution was adequate and that the respondent interested party group response was inadequate.⁶ Finding no other circumstances that would warrant conducting full reviews, the Commission determined that it would conduct expedited five-year reviews of the orders.⁷ On May 15, 2025, Encore and Southwire filed comments regarding the determination that the Commission should reach in these expedited reviews pursuant to 19 C.F.R. § 207.62(d), arguing for affirmative determinations.⁸

In these reviews, U.S. industry data are based on information submitted by Encore and Southwire in their responses to the notice of institution, accounting for an estimated *** percent of domestic production of AWC in 2023.⁹ U.S. import data and related information are based on Commerce's official import statistics.¹⁰ Foreign industry data and related information

⁷ Aluminum Wire and Cable from China; Scheduling of Expedited Five Year Reviews, 90 Fed. Reg. at 11182.

⁸ Southwire's Final Comments, EDIS Doc. 851311 (May 15, 2024); Encore Wire Corporation's Final Comments, EDIS Doc. 851333 (May 15, 2024).

⁹ Encore Response at Ex. 1; Southwire Response at Ex. 1; Confidential Report, INV-XX-010, EDIS Doc. 841664 (Jan. 23, 2025) ("CR"); Aluminum Wire and Cable from China, Inv. No. 731-TA-1428 (Review), USITC Pub. 5635 (June 2025) ("PR") at B.4.

¹⁰ CR/PR at Tables I.4 & I.5. The Commission compiled the information contained in these tables using Commerce statistics for Harmonized Tariff Schedule ("HTS") statistical reporting number 8544.49.9000. *Id.* These data may contain products outside the scope of these reviews and thus may be overstated. *Id.* at Table I.4 note. At the same time, these data regarding subject imports may also be understated for the November 2019-September 2023 reporting period. *Southwire Response* at Exs. 3 & 4. In January 2025, Commerce found that imports of AWC completed in South Korea and Vietnam using certain AWC inputs from China were circumventing the antidumping and countervailing duty orders for AWC from China. *Aluminum Wire & Cable from the People's Republic of China: Final Negative Scope Ruling and Final Affirmative Determination of Circumvention with Respect to the Socialist Republic of Vietnam, 90 Fed. Reg. 8196 (Jan. 27, 2025) ("Vietnam Circumvention Final Results") (EDIS Doc. No. (Continued...)*

⁴ Aluminum and Wire Cable from China; Institution of Five-Year Reviews, 89 Fed. Reg. 87401 (Nov. 1, 2024).

⁵ Encore's Response to the Notice of Institution, EDIS Doc. 838334 (Dec. 2, 2024) ("*Encore Response*"); Southwire's Response to the Notice of Institution, EDIS Doc. 838362 (Dec. 2, 2024) ("*Southwire Response*").

⁶ Aluminum Wire and Cable from China; Scheduling of Expedited Five-Year Reviews, 90 Fed. Reg. 11181 (Mar. 4, 2025); Explanation of Commission Determination on Adequacy, EDIS Doc. 843178 (Feb. 21, 2025).

are based on information from the original investigations, as well as information submitted by Encore and Southwire in these expedited reviews, and publicly available information, such as Global Trade Atlas ("GTA") data, gathered by Commission staff.¹¹ One U.S. purchaser of AWC, ***, responded to the Commission's adequacy phase questionnaire.¹²

II. Domestic Like Product

A. Domestic Like Product

In making its determination under section 751(c) of the Tariff Act, the Commission defines the "domestic like product" and the "industry."¹³ 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 under this subtitle."¹⁴ The Commission's practice in five-year reviews is to examine the domestic like product definition from the original investigation and consider whether the record indicates any reason to revisit the prior findings.¹⁵

^{750713),} and accompanying Issues and Decision Memorandum ("Vietnam Circumvention Decision Memorandum"), A-570-095, C-570-096 (Circumvention Inquiry) (Jan. 17, 2025); *Aluminum Wire and Cable from the People's Republic of China: Final Negative Scope Ruling and Final Affirmative Determination of Circumvention with Respect to the Republic of Korea*, 90 Fed. Reg. 8183 (Jan. 27, 2025) ("South Korea Circumvention Final Results") (EDIS Doc. No. 850713), and accompanying Issues and Decision Memorandum ("South Korea Circumvention Decision Memorandum"), A-570-095, C-570-096 (Circumvention Inquiry) (Jan. 17, 2025); *see also Southwire Response* at 7 n.22 & Ex. 3 (citing *Aluminum Wire and Cable from the People's Republic of China: Preliminary Negative Scope Determinations with Respect to Cambodia, Korea, and Vietnam; Preliminary Affirmative Determinations of Circumvention with Respect to Korea and Vietnam; Preliminary Negative Determination of Circumvention with Respect to Cambodia,* 89 Fed. Reg. 64406 (Aug. 7, 2024), and attaching the accompanying South Korea and Vietnam Preliminary Decision Memoranda ("South Korea Preliminary Circumvention Decision Memorandum" and "Vietnam Preliminary Circumvention Decision Memorandum"), A-570-095 (Circumvention Inquiry) (July 31, 2024)).

¹¹ The Commission used GTA data for Harmonized System ("HS") subheading 8544.49 for Tables I.6 & I.7, which may contain products outside the scope of these reviews.

¹² CR/PR at D.3.

¹³ 19 U.S.C. § 1677(4)(A).

¹⁴ 19 U.S.C. § 1677(10); see, e.g., Cleo Inc. v. United States, 501 F.3d 1291, 1299 (Fed. Cir. 2007); NEC Corp. v. Department of Commerce, 36 F. Supp. 2d 380, 383 (Ct. Int'l Trade 1998); Nippon Steel Corp. v. United States, 19 CIT 450, 455 (1995); Timken Co. v. United States, 913 F. Supp. 580, 584 (Ct. Int'l Trade 1996); Torrington Co. v. United States, 747 F. Supp. 744, 748-49 (Ct. Int'l Trade 1990), aff'd, 938 F.2d 1278 (Fed. Cir. 1991); see also S. Rep. No. 249, 96th Cong., 1st Sess. 90-91 (1979).

¹⁵ See, e.g., Internal Combustion Industrial Forklift Trucks from Japan, Inv. No. 731-TA-377 (Second Review), USITC Pub. 3831 at 8-9 (Dec. 2005); *Crawfish Tail Meat from China*, Inv. No. 731-TA-(Continued...)

Commerce has defined the scope of the imported merchandise within the scope of the orders under review as follows:

The scope of the *Order*{*s*} covers aluminum wire and cable, which is defined as an assembly of one or more electrical conductors made from 8000 Series Aluminum Alloys (defined in accordance with ASTM B800), Aluminum Alloy 1350 (defined in accordance with ASTM B230/B230M or B609/B609M), and/or Aluminum Alloy 6201 (defined in accordance with ASTM B398/B398M), provided that: (1) At least one of the electrical conductors is insulated; (2) each insulated electrical conductor has a voltage rating greater than 80 volts and not exceeding 1000 volts; and (3) at least one electrical conductor is stranded and has a size not less than 16.5 thousand circular mil (kcmil) and not greater than 1000 kcmil. The assembly may: (1) include a grounding or neutral conductor; (2) be clad with aluminum, steel, or other base metal; or (3) include a steel support center wire, one or more connectors, a tape shield, a jacket or other covering, and/or filler materials.

Most aluminum wire and cable products conform to National Electrical Code (NEC) types THHN, THWN, THWN-2, XHHW-2, USE, USE-2, RHH, RHW, or RHW-2, and also conform to Underwriters Laboratories (UL) standards UL-44, UL-83, UL-758, UL- 854, UL-1063, UL-1277, UL-1569, UL-1581, or UL-4703, but such conformity is not required for the merchandise to be included within the scope.

The scope of the *Order*{*s*} specifically excludes aluminum wire and cable products in lengths less than six feet, whether or not included in equipment already assembled at the time of importation. The merchandise covered by the *Order* is currently classifiable under subheading 8544.49.9000 of the Harmonized Tariff Schedule of the United States (HTSUS). Products subject to the scope may also enter under HTSUS subheading 8544.42.9090. The HTSUS subheadings are provided

^{752 (}Review), USITC Pub. 3614 at 4 (July 2003); *Steel Concrete Reinforcing Bar from Turkey*, Inv. No. 731-TA-745 (Review), USITC Pub. 3577 at 4 (Feb. 2003).

for convenience and customs purposes. The written description of the scope of the $Order\{s\}$ is dispositive.¹⁶

AWC products are insulated electrical conductors, manufactured to meet industry standards and electrical codes.¹⁷ AWC is used in the transmission and distribution of electricity, using aluminum's relatively high thermal and electrical conductivities to transmit electrical power in industrial and commercial applications, as well as in some residential applications.¹⁸

In the original investigations, the Commission defined a single domestic like product consisting of AWC, coextensive with the scope of the investigations.¹⁹ In its preliminary determinations, the Commission found that all AWC shared the same basic physical characteristics and uses, was manufactured in the same production facilities by the same employees using common production processes, and that AWC made to a particular specification was interchangeable.²⁰ Finding no new information or argument to the contrary in the final phase of the investigations, the Commission again defined a single domestic like product consisting of AWC, coextensive with the scope.²¹

¹⁶ Aluminum Wire and Cable from the People's Republic of China: Final Results of the First Expedited Sunset Reviews of the Antidumping Duty Order, 90 Fed. Reg. 11719 (Mar. 11, 2025) ("AD Final Results"), and accompanying Issues and Decision Memorandum for the Final Results of the Expedited First Sunset Reviews of the Antidumping Duty Order on Aluminum and Cable from the People's Republic of China, ("AD Issues and Decision Memorandum"), A-570-095, (Sunset Review) EDIS Doc. 848055 (Mar. 4, 2025) at 2-3; Aluminum Wire and Cable from the People's Republic of China: Final Results of the Expedited First Sunset Review of the Countervailing Duty Order, 90 Fed. Reg. 11709, 11710 (Mar. 11, 2025) ("CVD Final Results"), and accompanying Issues and Decision Memorandum for the Final Results of the Expedited First Sunset Reviews of the Countervailing Duty Order on Aluminum and Cable from the People's Republic of China, ("CVD Issues and Decision Memorandum"), C-570-096, (Sunset Review) EDIS Doc. 848055 (Mar. 4, 2025) at 2-3.

¹⁷ CR/PR at 1.4 & 1.6.

¹⁸ CR/PR at 1.5 & n.17.

¹⁹ Original Determinations, USITC Pub. 5001 at 6-7.

²⁰ Original Determinations, USITC Pub. 5001 at 6-7.

²¹ Original Determinations, USITC Pub. 5001 at 7.

In these first five-year reviews, the record does not contain any new information indicating that the pertinent characteristics and uses of AWC have changed since the original investigations.²² Encore argues that the Commission should adopt the definition of the domestic like product from the original investigations, and Southwire does not address the issue.²³ Accordingly, we again define the domestic like product as consisting of AWC, coextensive with Commerce's scope.

B. Domestic Industry

Section 771(4)(A) of the Tariff Act defines the relevant industry as the domestic "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."²⁴ In defining the domestic industry, the Commission's general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

In the original investigations, the Commission defined the domestic industry to include all U.S. producers of AWC.²⁵

In these reviews, Encore argues that the Commission should adopt the domestic industry definition from the original investigations.²⁶ Based on Encore's representation, there are no related party issues in these reviews.²⁷ Accordingly, consistent with our definition of the domestic like product, we define the domestic industry to include all domestic producers of AWC.

²² CR/PR at I.3-1.8.

²³ Encore Response at 18; see generally Southwire Response.

²⁴ 19 U.S.C. § 1677(4)(A). The definitions in 19 U.S.C. § 1677 are applicable to the entire subtitle containing the antidumping and countervailing duty laws, including 19 U.S.C. §§ 1675 and 1675a. *See* 19 U.S.C. § 1677.

²⁵ Original Determinations, USITC Pub. 5001 at 7. There were no related party issues. *Id.* Those producers were: Encore, Southwire, Nexans Group ("Nexans"), Prysmian Group ("Prysmian") and Cerro Wire LLC ("Cerro"). *Id.* at 7 n.25.

²⁶ *Encore Response* at 18. Southwire does not address the issue.

²⁷ See Encore Response at 18.

III. Revocation of the Antidumping and Countervailing Duty Orders Would Likely Lead to Continuation or Recurrence of Material Injury Within a Reasonably Foreseeable Time

A. Legal Standards

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order "would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time."²⁸ The SAA states that "under the likelihood standard, the Commission will engage in a counterfactual analysis; it must decide the likely impact in the reasonably foreseeable future of an important change in the status quo – the revocation or termination of a proceeding and the elimination of its restraining effects on volumes and prices of imports."²⁹ Thus, the likelihood standard is prospective in nature.³⁰ The U.S. Court of International Trade has found that "likely," as used in the five-year review provisions of the Act, means "probable," and the Commission applies that standard in five-year reviews.³¹

²⁸ 19 U.S.C. § 1675a(a).

²⁹ SAA at 883-84. The SAA states that "{t}he likelihood of injury standard applies regardless of the nature of the Commission's original determination (material injury, threat of material injury, or material retardation of an industry). Likewise, the standard applies to suspended investigations that were never completed." *Id*. at 883.

³⁰ While the SAA states that "a separate determination regarding current material injury is not necessary," it indicates that "the Commission may consider relevant factors such as current and likely continued depressed shipment levels and current and likely continued {sic} prices for the domestic like product in the U.S. market in making its determination of the likelihood of continuation or recurrence of material injury if the order is revoked." SAA at 884.

³¹ See NMB Singapore Ltd. v. United States, 288 F. Supp. 2d 1306, 1352 (Ct. Int'l Trade 2003) ("'likely' means probable within the context of 19 U.S.C. § 1675(c) and 19 U.S.C. § 1675a(a)"), *aff'd mem.*, 140 Fed. Appx. 268 (Fed. Cir. 2005); *Nippon Steel Corp. v. United States*, 26 CIT 1416, 1419 (2002) (same); *Usinor Industeel, S.A. v. United States*, 26 CIT 1402, 1404 nn.3, 6 (2002) ("more likely than not" standard is "consistent with the court's opinion;" "the court has not interpreted 'likely' to imply any particular degree of 'certainty'"); *Indorama Chemicals (Thailand) Ltd. v. United States*, 26 CIT 1059, 1070 (2002) ("standard is based on a likelihood of continuation or recurrence of injury, not a certainty"); *Usinor v. United States*, 26 CIT 767, 794 (2002) ("'likely' is tantamount to 'probable,' not merely 'possible'").

The statute states that "the Commission shall consider that the effects of revocation or termination may not be imminent, but may manifest themselves only over a longer period of time."³² According to the SAA, a "'reasonably foreseeable time' will vary from case-to-case, but normally will exceed the 'imminent' timeframe applicable in a threat of injury analysis in original investigations."³³

Although the standard in a five-year review is not the same as the standard applied in an original investigation, it contains some of the same fundamental elements. The statute provides that the Commission is to "consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the order is revoked or the suspended investigation is terminated."³⁴ It directs the Commission to take into account its prior injury determination, whether any improvement in the state of the industry is related to the order or the suspension agreement under review, whether the industry is vulnerable to material injury if an order is revoked or a suspension agreement is terminated, and any findings by Commerce regarding duty absorption pursuant to 19 U.S.C. § 1675(a)(4).³⁵ The statute further provides that the presence or absence of any factor that the Commission is required to consider shall not necessarily give decisive guidance with respect to the Commission's determination.³⁶

³⁴ 19 U.S.C. § 1675a(a)(1).

^{32 19} U.S.C. § 1675a(a)(5).

³³ SAA at 887. Among the factors that the Commission should consider in this regard are "the fungibility or differentiation within the product in question, the level of substitutability between the imported and domestic products, the channels of distribution used, the methods of contracting (such as spot sales or long-term contracts), and lead times for delivery of goods, as well as other factors that may only manifest themselves in the longer term, such as planned investment and the shifting of production facilities." *Id*.

³⁵ 19 U.S.C. § 1675a(a)(1). Commerce has not made any findings regarding duty absorption. *See generally* AD Issues and Decision Memorandum; CVD Issues and Decision Memorandum.

³⁶ 19 U.S.C. § 1675a(a)(5). Although the Commission must consider all factors, no one factor is necessarily dispositive. SAA at 886.

In evaluating the likely volume of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether the likely volume of imports would be significant either in absolute terms or relative to production or consumption in the United States.³⁷ In doing so, the Commission must consider "all relevant economic factors," including four enumerated factors: (1) any likely increase in production capacity or existing unused production capacity in the exporting country; (2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) 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.³⁸

In evaluating the likely price effects of subject imports if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether there is likely to be significant underselling by the subject imports as compared to the domestic like product and whether the subject imports are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic like product.³⁹

³⁷ 19 U.S.C. § 1675a(a)(2).

³⁸ 19 U.S.C. § 1675a(a)(2)(A-D).

³⁹ See 19 U.S.C. § 1675a(a)(3). The SAA states that "{c}onsistent with its practice in investigations, in considering the likely price effects of imports in the event of revocation and termination, the Commission may rely on circumstantial, as well as direct, evidence of the adverse effects of unfairly traded imports on domestic prices." SAA at 886.

In evaluating the likely impact of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider all relevant economic factors that are likely to have a bearing on the state of the industry in the United States, including but not limited to the following: (1) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity; (2) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment; and (3) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.⁴⁰ All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to which any improvement in the state of the domestic industry is related to the order under review and whether the industry is vulnerable to material injury upon revocation.⁴¹

No respondent interested party participated in these expedited reviews. The record, therefore, contains limited new information with respect to the AWC industry in China. There also is limited information on the AWC market in the United States during the period of review. Accordingly, for our determination, we rely as appropriate on the facts available from the original investigations, and the limited new information on the record in these five-year reviews.

B. Conditions of Competition and the Business Cycle

In evaluating the likely impact of the subject imports on the domestic industry if an order is revoked, the statute directs the Commission to consider all relevant economic factors "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."⁴² The following conditions of competition inform our determinations.

⁴⁰ 19 U.S.C. § 1675a(a)(4).

⁴¹ The SAA states that in assessing whether the domestic industry is vulnerable to injury if the order is revoked, the Commission "considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they may also demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports." SAA at 885.

⁴² 19 U.S.C. § 1675a(a)(4).

1. Demand Conditions

Original Investigations. In the original investigations, the Commission found that AWC was used to conduct electrical power in residential, industrial, and commercial applications, and that demand for AWC was driven by construction activity.⁴³ Most responding U.S. producers and importers reported that U.S. demand for AWC had increased since the beginning of the period of investigation ("POI").⁴⁴

Apparent U.S. consumption of AWC increased 10.2 percent during the POI, from 430.3 million pounds in 2016 to 473.9 million pounds in 2018.⁴⁵ It was higher in the first quarter of 2019 ("interim 2019") at 241.0 million pounds, than in the first quarter of 2018 ("interim 2018") at 236.0 million pounds.⁴⁶

Current Reviews. In the current reviews, there is no new information on the record indicating that the drivers of demand for AWC have changed since the original investigations. Southwire and responding purchaser *** indicate that there have been no changes in demand conditions since 2019.⁴⁷ Based on the domestic industry's domestic production in 2018, adjusted using the Federal Reserve Industrial Production Index for Communication and Energy Wire and Cable Manufacturing, and official import statistics, Encore estimates that apparent U.S. consumption for AWC has more than doubled since 2018, from 474.0 million pounds in 2018 to 962.7 million pounds in 2023.⁴⁸ Encore also cites data from Trading Economics regarding U.S. non-residential construction spending during the 2015-2024 period to argue that private construction spending, which increased through 2023, may soon slow.⁴⁹

Apparent U.S. consumption of AWC was *** pounds in 2023, down from *** pounds in 2018.⁵⁰

⁴³ Original Determinations, USITC Pub. 5001 at 11. The other demand drivers for AWC were electricity usage and overall economic activity. *Id.* at 11 n.45.

⁴⁴ Original Determinations, USITC Pub. 5001 at 11.

⁴⁵ Original Determinations, USITC Pub. 5001 at 12.

⁴⁶ Original Determinations, USITC Pub. 5001 at 12.

⁴⁷ Southwire Response at 13-14; CR/PR at D.3.

⁴⁸ Encore Response at 17 n.62, 18 & Ex. 1.

⁴⁹ Encore Response at 9 & Figure 1; Original Determinations, USITC Pub. 5001 at 11. Encore argues that if private construction spending declines, it would place the domestic industry "in a poor position to endure any resurgence in subject import volumes that would occur in the event of revocation." Encore Response at 9.

⁵⁰ CR/PR at Table 1.5. Apparent U.S. consumption in the current reviews is understated relative to that in the original investigations because responding domestic producers accounted for all domestic production in the original investigations, but only *** percent of domestic production in 2023. *Id.* at I.8.

2. Supply Conditions

Original Investigations. In the original investigations the Commission found that the domestic industry was the dominant supplier of AWC to the U.S. market.⁵¹ Its market share decreased from 73.5 percent in 2016 to 69.4 percent in 2018, and was lower in interim 2019 than in interim 2018.⁵² The Commission found that the domestic industry consisted of five firms: Encore, Nexans, Cerro, Prysmian, and Southwire.⁵³ The domestic industry's capacity grew from 2016 to 2018, and exceeded apparent U.S. consumption throughout the POI.⁵⁴

The Commission found that subject imports were the second largest source of supply in the U.S. market and that subject imports' share of apparent U.S. consumption increased from *** percent in 2016 to 18.0 percent in 2018 and was lower in interim 2019 than in interim 2018.⁵⁵

Nonsubject imports' share of apparent U.S. consumption increased from *** percent in 2016 to 12.6 percent in 2018 and was higher in interim 2019 than in interim 2018.⁵⁶ The largest sources of nonsubject imports during the POI included Ecuador, Mexico, and Turkey.⁵⁷

Current Reviews. In the current reviews, the information available on producers Encore and Southwire indicates that the domestic industry accounted for the largest share of apparent U.S. consumption of AWC in 2023, subject imports accounted for the smallest share, and nonsubject imports accounted for the second-largest share.⁵⁸

⁵¹ Original Determinations, USITC Pub. 5001 at 12.

⁵² Original Determinations, USITC Pub. 5001 at 12.

⁵³ Original Determinations, USITC Pub. 5001 at 12.

⁵⁴ Original Determinations, USITC Pub. 5001 at 12.

⁵⁵ Confidential Views of the Commission, Aluminum Wire and Cable from China, Inv. Nos. 701-TA-611 and 731-TA-1428 (Investigations), EDIS Doc. 839843 at 14 (Dec. 2019) ("Confidential Original Determinations"); *Original Determinations*, USITC Pub. 5001 at 12.

⁵⁶ Confidential Original Determinations at 14; *Original Determinations*, USITC Pub. 5001 at 12.

⁵⁷ Original Determinations, USITC Pub. 5001 at 12.

⁵⁸ CR/PR at Table 1.5.

The domestic industry accounted for *** percent of apparent U.S. consumption in 2023.⁵⁹ The domestic interested parties identified five domestic producers of AWC.⁶⁰ During the period of review, the domestic AWC industry expanded several existing facilities, opened a new plant, and closed two plants.⁶¹ Encore and responding purchaser *** reported that there have been no changes in the supply conditions for AWC during the period of review.⁶²

Subject imports accounted for *** percent of apparent U.S. consumption in 2023.⁶³ In 2024, Commerce determined that China had circumvented the AWC orders between November 2018 and September 2023 by shipping AWC components of Chinese origin to South Korea and Vietnam for further processing before such merchandise was imported into the United States.⁶⁴ Accordingly, the volumes of subject imports during the 2018-23 period, and their market share in 2023, are likely understated.

Nonsubject imports accounted for *** percent of apparent U.S. consumption in 2023.⁶⁵ Of the nonsubject sources of AWC, Cambodia was the largest source of supply in 2023, followed by South Korea and Mexico.⁶⁶

⁶² Encore Response at 18; CR/PR at D.3.

⁶³ CR/PR at Table I.5.

⁶⁴ Vietnam Circumvention Decision Memorandum at 1-2; South Korea Circumvention Decision Memorandum at 1-2.

⁶⁵ CR/PR at Table I.5.

⁶⁶ CR/PR at Table I.4.

⁵⁹ CR/PR at Table 1.5. The domestic industry's share of apparent U.S. consumption in these reviews may be understated relative to that in the prior proceedings due to the lower data coverage of the domestic industry in these reviews, as discussed in section III.B.1, above. CR/PR at 1.8.

⁶⁰ CR/PR at 1.8; *Southwire Response* at Ex. 1; *Encore Response* at Ex. 1. The producers are Cerro, Encore, Nexans, Prysmian, and Southwire. *Southwire Response* at Ex. 1; *Encore Response* at Ex. 1. In July 2024, Prysmian acquired Encore. CR/PR at Table 1.2.

⁶¹ The reported factory expansions include: Prysmian's 115,000 square foot expansion of its facility in Sedalia, Missouri, in November 2022, Prysmian's 51,000 square foot expansion of its facility in Williamsport, Pennsylvania, in April 2023, and Southwire's 340,000 square foot expansion of its facility in Florence, Alabama, in June 2023, which is not confirmed to have in-scope AWC production. CR/PR at Table 1.2. In addition, Cerrowire opened a new 270,000 square foot metal clad wire plant in April 2023, with additional construction expected in 2024. *Id.* In May 2024, Southwire announced a 50,000 square foot expansion of its Cofer Technology Center in Carrolton, Georgia, in July 2024, Prysmian completed its acquisition of Encore Wire and its facility in McKinney, Texas, and in November 2024, Southwire announced the construction of a new, larger facility to replace its current operations in Youngsville, North Carolina, which is not confirmed to have in-scope AWC production. *Id.* On the other hand, in January 2020, Southwire announced that it would be closing its plant in Hayesville, North Carolina, in March 2020, which may have produced AWC, and that it would be moving the plant's wire and cable operations to other Southwire facilities. *Id.* In September 2020, Nexans announced the closure of its cable plant in Chester, New York. *Id.*

3. Substitutability and Other Conditions

Original Investigations. In the original investigations, the Commission found that the domestic like product and subject imports were highly substitutable and that price was an important factor in purchasing decisions.⁶⁷

The Commission found that raw materials accounted for 71 percent of the cost of goods sold ("COGS") and that aluminum wire rod was the primary raw material used to manufacture AWC.⁶⁸ U.S. producers either produced their own wire rod from primary aluminum and alloying materials, or they purchased wire rod made from a combination of primary aluminum and aluminum alloy scrap.⁶⁹ During the POI, the price of aluminum sheet scrap decreased overall by *** percent, and the price of primary aluminum increased overall by *** percent.⁷⁰

⁶⁷ Original Determinations, USITC Pub. 5001 at 13.

⁶⁸ Original Determinations, USITC Pub. 5001 at 14.

⁶⁹ Original Determinations, USITC Pub. 5001 at 14.

⁷⁰ Confidential Original Determinations at 16-17.

Duties of 10 percent *ad valorem* were imposed in March 2018 on imports of certain aluminum products pursuant to section 232 of the Trade Expansion Act of 1962 ("section 232 tariffs").⁷¹ The section 232 tariffs applied to aluminum wire rod used as an input by the domestic industry, but not to AWC.⁷² Effective March 12, 2025, section 232 duties on aluminum wire rod were raised to 25 percent *ad valorem*.⁷³ In addition, duties of 25 percent *ad valorem* were imposed on products from China entering under HTS subheading 8544.49.90, a category including AWC (without connectors), under section 301 of the Trade Act of 1974 ("section 301 tariffs") in July 2018, and duties of ten percent *ad valorem* were imposed pursuant to section 301 on products from China entering under HTS subheading 8544.42.9090, a category including AWC (with connectors), in September 2018.⁷⁴ Effective June 2019, the section 301 duty rate on AWC with connectors from China was escalated to 25 percent.⁷⁵ Effective September 2019, AWC without connectors from China was excluded from Section 301 tariffs, ⁷⁶ and AWC with connectors was excluded the following month.⁷⁷

⁷¹ Original Determinations, USITC Pub. 5001 at 14 & nn.71-72 (citing 19 U.S.C. § 1862 & Adjusting Imports of Aluminum into the United States, Presidential Proclamation 9704, March 8, 2018, 83 Fed. Reg. 11619 (Mar. 15, 2018)).

⁷² Original Determinations, USITC Pub. 5001 at 14. All responding U.S. producers reported that the section 232 tariffs contributed to increases in their raw material costs.

⁷³ Presidential Proclamation No. 10895, 90 Fed. Reg. 9807 (Feb. 18, 2025).

⁷⁴ Original Determinations, USITC Pub. 5001 at 15 & nn.76 & 77 (citing Notice of Action and Request for Public Comment Concerning Proposed Determination of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation, 83 Fed Reg. 28710 (Jun. 20, 2018) and Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation, 83 Fed. Reg. 47974 (Sep. 21, 2018)).

⁷⁵ Original Determinations, USITC Pub. 5001 at 15 n.78 (citing Additional Implementing Modification to Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation, 84 Fed. Reg. 26930 (Jun. 10, 2019)).

⁷⁶ Original Determinations, USITC Pub. 5001 at 15 n.79 (citing Notice of Product Exclusions: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property and Innovation, 84 Fed. Reg. 49564 (Sept. 20, 2019)).

⁷⁷ Original Determinations, USITC Pub. 5001 at 15 n.80 (citing Notice of Product Exclusions: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation, 84 Fed. Reg. 57803 (Oct. 28, 2019)).

Current Reviews. The record in these reviews contains no new information to indicate that the degree of substitutability between the domestic like product and subject imports or the importance of price in purchasing decisions has changed since the investigations. Encore and Southwire contend that there continues to be a high degree of substitutability between subject imports and the domestic like product and that price remains an important factor in purchasing decisions.⁷⁸ Accordingly, we again find that there is a high degree of substitutability between the domestic like product and subject imports, and that price remains an important factor in factor in purchasing decisions.

Encore cites data from Statista regarding monthly prices for primary aluminum, which is one of the primary raw materials used to produce AWC, and states that prices increased from \$1,755.95 per metric ton in June 2024 to \$2,343.67 per metric ton in September 2024.⁷⁹ Encore notes, however, that there is no indication that this price increase has impacted the supply of AWC from either domestic or imported sources.⁸⁰

As already noted, AWC with conductors and AWC without conductors were subject to section 301 tariffs during the current period of review. The exclusions that were granted for these products from the section 301 tariffs in 2019 expired in 2020.⁸¹

C. Likely Volume of Subject Imports

1. Original Investigations

In the original investigations, the Commission found that the quantity of subject imports rose from 66.3 million pounds in 2016 to 92.6 million pounds in 2017, and then declined to 85 million pounds in 2018.⁸² The market share of subject imports increased from *** percent in

⁷⁸ Encore Response at 8; Southwire Response at 10.

⁷⁹ Encore Response at 10 & n.43.

⁸⁰ Encore Response at 18 (stating that "there is no indication that {the increase in price of primary aluminum} has impacted the supply of AWC from either domestic or imported sources").

⁸¹ The tariff exclusion on AWC without connectors expired on September 20, 2020. *Notice of Product Exclusions: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property and Innovation,* 84 Fed. Reg. at 49564. The tariff exclusion on AWC with connectors expired on October 28, 2020. *Notice of Product Exclusions: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation,* 84 Fed. Reg. at 57803.

⁸² Original Determinations, USITC Pub. 5001 at 15. Subject import quantity was 5.9 million pounds in interim 2019 and 41.5 million pounds in interim 2018. *Id.* at 15 n.82. Finding that the filing of the petitions in September 2018 caused subject imports to recede, the Commission accorded reduced weight to the interim 2019 data in making its material injury determinations, although it recognized that the imposition of the section 301 tariffs on AWC from China might have contributed to the decline. *Id.* (citing 19 U.S.C. § 1677(7)(I)).

2016 to 17.6 percent in 2017 and 18.0 percent in 2018.⁸³ Subject imports gained *** percentage points of market share at the expense of the domestic industry, which lost 4.1 percentage points overall, between 2016 and 2018.⁸⁴

2. Current Reviews

In the current reviews, the information available indicates that, although the orders have restrained the volume of subject imports, subject imports have maintained a presence in the U.S. market. The volume of subject imports fluctuated irregularly during the period of review, increasing from 1.3 million pounds in 2019 to 8.8 million pounds in 2020, before decreasing to 7.8 million pounds in 2021, 2.0 million pounds in 2022, and 1.5 million pounds in 2023.⁸⁵ Subject imports accounted for *** percent of apparent U.S. consumption in 2023.⁸⁶ As discussed in section III.B.2 above, these data likely understate the volume of subject imports during the 2019-2023 period, as well as subject import market share in 2023, given Commerce's final affirmative determinations that imports of AWC completed in South Korea and Vietnam using certain AWC components from China had circumvented the orders in those years.⁸⁷

The record in these expedited reviews contains limited information on the subject industry in China. The information available indicates that subject producers continue to have the ability and incentive to export significant volumes of subject merchandise to the U.S. market in the event of revocation of the orders. Although no subject producer responded to

⁸³ Original Determinations, USITC Pub. 5001 at 15-16; Confidential Original Determinations at 18-19. Subject imports' market share was 9.8 percent in interim 2019, down from 17.7 percent in interim 2018. *Id.* at 19 n.83.

⁸⁴ Original Determinations, USITC Pub. 5001 at 19 & n.83; Confidential Original Determinations at 19. The domestic industry's share of apparent U.S. consumption declined from 73.5 percent in 2016 to 70.0 percent in 2017 and 69.4 percent in 2018. *Original Determinations*, USITC Pub. 5001 at 19 n.84.

⁸⁵ CR/PR at Table 1.4.

⁸⁶ CR/PR at Table I.5.

⁸⁷ As a result of Commerce's final circumvention determination, imports from Korea and Vietnam will be subject to the antidumping duty rate for the China-wide entity, which is 52.79 percent and the all-others rate from the countervailing duty order, which is 33.44 percent. Vietnam Circumvention Final Results, 90 Fed. Reg. at 8197; South Korea Final Results, 90 Fed. Reg. at 8184. Nonsubject imports from South Korea increased significantly during the period of review from 746,000 pounds in 2019 to 1.3 million pounds in 2020, 3.9 million pounds in 2021, 12.8 million pounds in 2022, and 15.1 million pounds in 2023. CR/PR at Table 1.4. Based on USITC Dataweb data submitted by Encore, nonsubject imports from Vietnam also increased significantly from 5.9 million pounds in 2019 to 20.6 million pounds in 2020, 21.8 million pounds in 2021, 43.0 million pounds in 2022, and 46.8 million pounds in 2023. *Encore Response* at Ex. 2.

the Commission's notice of institution in these reviews, the domestic interested parties have identified 32 possible producers of AWC in China.^{88 89}

The information available indicates that the subject industry maintains substantial capacity to produce AWC, including excess capacity. There is no information on the record indicating that the subject industry has reduced its capacity since the original investigations.⁹⁰ Indeed, Southwire submitted an article from Reuters indicating that the Chinese aluminum industry continues to suffer from oversupply and that it relies on exports of semi-manufactured aluminum components, such as the aluminum components of AWC, to relieve its excess production.⁹¹ Given the subject industry's substantial exports of semi-finished aluminum components, including to South Korea and Vietnam for finishing into AWC for export to the United States as a means of circumventing the orders during the period of review, subject producers would have the ability to shift production from semi-finished aluminum components to finished AWC as a means of increasing exports of AWC to the United States after revocation.⁹²

The available information also indicates that subject producers remain large exporters. According to GTA data concerning insulated conductors imported under HS subheading 8544.49, a product category that includes both AWC and out-of-scope products, exports of such merchandise from China increased irregularly from 1.7 billion pounds in 2019 to 1.9 billion pounds in 2023, making China the world's largest exporter of such merchandise by a sizeable margin throughout the period of review.⁹³

⁸⁸ CR/PR at 1.15; Encore Response at Ex. 1; Southwire Response at Ex. 1. 5

⁸⁹ As also discussed in section III.B.2 above, these data may also be overstated as HTS statistical reporting number 8544.49.9000 may contain products outside the scope of these reviews.

⁹⁰ In the original investigations, the Commission issued foreign producers' or exporters' questionnaires to 32 firms believed to produce and/or export AWC from China but received only one usable response to its questionnaire from producer Shanghai Cable Works ("Shanghai Cable"), which estimated that it accounted for approximately *** percent of AWC production in China. Confidential Report, INV-RR-117, EDIS Doc. 841664 (Nov. 6, 2019) at VII-3 through VII-4 and Table VII-1. That producer reported capacity of *** pounds in 2018, including excess capacity of *** pounds. *Id.* at Table VII-1. During the preliminary phase of the investigations, the Commission received usable questionnaires from seven firms, including Shanghai Cable, whose production accounted for approximately *** percent of overall production of AWC in China in 2017. *Id.* at VII-3. In 2017, those producers reported capacity of 83.7 million pounds, including excess capacity of 14.5 million pounds. *Id.* at Appendix F at Table VII-4.

⁹¹ Southwire Response at 8-9 & Ex. 4.

⁹² See Southwire Response at 9.

⁹³ CR/PR at Tables 1.6 & 1.7.

In addition, the information available indicates that the United States remains an attractive market to Chinese producers. As discussed above, subject imports maintained a presence in the U.S. market throughout the period of review, accounting for *** percent of apparent U.S. consumption in 2023, enabling subject producers to retain customers and distribution networks in the United States.⁹⁴ GTA data concerning Chinese exports of insulated conductors imported under HS subheading 8544.49, a product category that includes both AWC and out-of-scope products, indicate that the United States was China's fifth largest destination market in 2023.⁹⁵ That year, China exported 90.0 million pounds of insulated conductors to the U.S. market, accounting for 4.6 percent of China's total exports of such merchandise.⁹⁶ Furthermore, Commerce's final determination that subject producers have circumvented the orders, by shipping AWC components to South Korea and Vietnam for processing into AWC for export to the United States, indicates that subject producers remain interested in serving the U.S. market.⁹⁷ Finally, according to Encore, the higher prices available in the U.S. market relative to the subject industry's largest third country market, Australia, would provide subject producers with an economic incentive to increase exports to the U.S. market if the orders were revoked.98

Given the foregoing, including the significant and increasing volume and market share of subject imports in the original investigations, the continued presence of subject imports during the period of review, the subject industry's large capacity, including excess capacity, and exports, and the attractiveness of the U.S. market to subject producers, we find that the volume of subject imports would likely be significant, both in absolute terms and relative to U.S. consumption, if the orders were to be revoked.⁹⁹

⁹⁸ Encore cites data concerning Chinese exports of merchandise under HS Subheading 8544.49, including AWC and out-of-scope products exports, to argue that the average unit value ("AUV") of such exports to China's largest third country market, Australia, was *** percent lower, at \$2.63 per pound, than ***, in 2023. *Encore Response* at 13 & Ex. 4. The AUV of the domestic industry's U.S. shipments was also higher, at *** per pound in 2023. CR/PR at Table 1.3.

⁹⁹ Although subject imports from China are currently subject to a 25 percent *ad valorem* duty under section 301, neither the domestic interested parties nor the responding purchaser indicate that this duty would prevent subject imports from entering the U.S. market at significant levels if the orders were revoked. *See generally Encore Response; Southwire Response;* CR/PR at D.3. Indeed, subject (Continued...)

⁹⁴ CR/PR at Table 1.5.

⁹⁵ CR/PR at Table 1.6.

⁹⁶ Derived from CR/PR at Table 1.6.

⁹⁷ South Korea Circumvention Determination at 1-2; Vietnam Circumvention Determination at 1-2.

D. Likely Price Effects

1. Original Investigations

In the original investigations, the Commission found that between 2016 and 2018, subject imports undersold the domestic like product in *** of *** quarterly comparisons, involving *** pounds of AWC, with an average underselling margin of *** percent.¹⁰⁰ Subject imports oversold the domestic like product in the remaining *** quarterly comparisons, involving *** pounds of AWC, with an average overselling margin of 2.7 percent.¹⁰¹ The Commission also noted that four of 11 responding purchasers reported that price was a primary reason they switched from the domestic like product to subject imports.¹⁰² Given the high degree of substitutability between the domestic like product and subject imports and the importance of price in purchasing decisions, the Commission found subject import underselling to be significant.¹⁰³

imports from China increased irregularly during the period of review notwithstanding this duty. CR/PR at Table 1.4. Given the Chinese industry's large capacity and exports, the continued presence of subject imports in the U.S. market, and the attractiveness of the U.S. market, we find that the section 301 duties would not likely prevent subject imports from increasing to significant levels if the orders were revoked.

The record of these expedited reviews contains no information on the inventories of subject producers. *Encore Response* at 14 (stating that "specific production, capacity, capacity utilization, and inventories of the AWC industry in China are not publicly available"). However, Southwire contends that subject producers' production capacity and shipments to third countries indicate that "Chinese producers likely have significant inventories of AWC that could be quickly routed to the United States if the *AWC Orders* were revoked." *Id.* at 9. The information available also indicates that AWC from China has not been subject to other antidumping or countervailing duty investigations outside the United States. CR/PR at 1.16; *Southwire Response* at 9.

¹⁰⁰ Original Determinations, USITC Pub. 5001 at 17; Confidential Original Determinations at 20. As discussed in section III.C.1 above, the Commission accorded reduced weight to interim 2019 data and therefore focused its analysis of price effect on the 2016-2018 period. *Original Determinations*, USITC Pub. 5001 at 17 n.89 (citing 19 U.S.C. § 1677(7)(I)). Of the *** quarterly comparisons comprising all periods examined (including interim 2019), subject imports undersold the domestic like product in *** quarters, with an average margin of underselling of *** percent. *Id.* at 17 n.90; Confidential Original Determinations at 20 n.90.

¹⁰¹ Original Determinations, USITC Pub. 5001 at 17; Confidential Original Determinations at 20. Of the *** quarterly comparisons comprising all periods examined (including interim 2019), subject imports oversold the domestic like product in *** quarters, with an average margin of overselling of *** percent. Original Determinations at 17 n.91; Confidential Original Determinations at 20 n.91.

¹⁰² Original Determinations, USITC Pub. 5001 at 17.

¹⁰³ Original Determinations, USITC Pub. 5001 at 17.

Considering price trends over the 2016-2018 period, the Commission found that domestic prices had declined for two products, increased for three products, and remained the same for one product, while subject import prices had increased for all six products.¹⁰⁴

The Commission also found that subject imports had prevented price increases which otherwise would have occurred, to a significant degree.¹⁰⁵ Specifically, it found that despite the increases in both apparent U.S. consumption and raw material costs between 2016 and 2018, the domestic industry was unable to raise prices sufficiently to cover its rising costs due to competition from lower-priced subject imports.¹⁰⁶ As the domestic industry was unable to raise prices of cost of goods sold to net sales increased by 5.2 percentage points from 2016 to 2018.¹⁰⁷ The Commission concluded that subject imports had significant price effects.¹⁰⁸

2. Current Reviews

As discussed above in section III.B.3, we continue to find a high degree of substitutability between subject imports and domestically produced AWC, and that price remains an important factor in purchasing decisions.

The record in these reviews does not contain new product-specific pricing information. Based on the available information, including the high degree of substitutability between subject imports and the domestic like product, the importance of price in purchasing decisions, and the attractiveness of the U.S. market to subject producers, we find that if the orders were revoked, subject imports would likely undersell the domestic like product to a significant degree as a means of gaining sales, as occurred in the original investigations. Absent the discipline of the orders, the significant volume of low-priced subject imports would likely take sales and market share from domestic producers and/or force the domestic industry to cut prices or forego needed price increases, thereby depressing or suppressing prices for the domestic like product. Consequently, we find that subject imports would likely have significant price effects on the domestic industry if the orders were revoked.

¹⁰⁴ Original Determinations, USITC Pub. 5001 at 18.

¹⁰⁵ Original Determinations, USITC Pub. 5001 at 18-19.

¹⁰⁶ Original Determinations, USITC Pub. 5001 at 18.

¹⁰⁷ Original Determinations, USITC Pub. 5001 at 18.

¹⁰⁸ Original Determinations, USITC Pub. 5001 at 18.

E. Likely Impact¹⁰⁹

1. Original Investigations

In the original investigations, the Commission found that the significant and increasing volume of low-priced subject imports prevented the domestic industry from fully benefitting from the substantial increase in U.S. demand for AWC from 2016 to 2018.¹¹⁰ As the domestic industry lost sales to subject imports, the Commission found, the industry's production and U.S. shipments increased by less than would have been expected given the increase in apparent U.S. consumption during that period.¹¹¹ Further, because of the price-suppressing effects of the subject imports, the Commission found that the domestic industry was unable to charge prices to fully recover its costs, which caused its revenues to be less than they would have been otherwise and its financial performance to decline by most measures.¹¹²

The Commission also considered the role of other factors, so as not to attribute likely injury from these factors to the subject imports. It found that, although nonsubject imports had gained market share over the POI, they were generally priced higher than the domestic like product and subject imports, and had not prevented the domestic industry's performance from improving after the filing of the petitions caused subject imports to recede.¹¹³ Thus, nonsubject imports could not explain the price effects that the Commission had attributed to subject imports.¹¹⁴ In addition, the Commission examined the role of the domestic industry's pricing on exports and concluded that the decline in the AUVs of the industry's export shipments from 2017 to 2018 could not account for the adverse impact resulting from the sales lost to low-priced subject imports.¹¹⁵

¹⁰⁹ In its expedited review of the antidumping duty order, Commerce determined that revocation of the antidumping order would likely result in the continuation or recurrence of dumping with margins of up to 63.47 percent. *AD Final Results*, 90 Fed. Reg. at 11719. In its expedited review of the countervailing duty order, Commerce determine that revocation of the countervailing duty order would be likely to lead to continuation or recurrence of countervailing subsidies at rates ranging from 33.44 percent to 165.63 percent. *CVD Final Results*, 90 Fed. Reg. at 11710.

¹¹⁰ Original Determinations, USITC Pub. 5001 at 22. As with the Commission's analyses of the subject imports' volume and price effects, it focused its impact analysis on calendar year 2016 to 2018 data. *Id.* at 19 n.102 (citing 19 U.S.C. § 1677(7)(I)).

¹¹¹ Original Determinations, USITC Pub. 5001 at 22.

¹¹² Original Determinations, USITC Pub. 5001 at 22.

¹¹³ Original Determinations, USITC Pub. 5001 at 22.

¹¹⁴ Original Determinations, USITC Pub. 5001 at 22.

¹¹⁵ Original Determinations, USITC Pub. 5001 at 22-23.

Thus, the Commission concluded that subject imports had a significant impact on the domestic industry.¹¹⁶

2. The Current Reviews

The record in these reviews contains limited information concerning the domestic industry's performance since the original investigations.

The information available on two domestic producers indicates that, although the domestic industry's operating performance in 2023 was mixed relative to its performance in 2018, the last year examined in the original investigations, its financial performance was generally stronger.¹¹⁷ In 2023, the domestic industry's capacity was *** pounds, its production was *** pounds, and its U.S. shipments were *** pounds, which were all lower than in 2018, which may reflect that not all domestic firms responded to the questionnaire.¹¹⁸ The industry's capacity utilization in 2023 was *** percent, which was slightly higher than in 2018, and the AUV of the industry's U.S. shipments was \$*** per pound, which was higher than in 2018.¹¹⁹ In 2023, the industry's share of apparent U.S. consumption of *** percent by quantity was slightly lower than in 2018, but would have been higher if more domestic firms had responded.¹²⁰ The industry's financial performance was stronger in 2023 than in the original investigations by every measure. Specifically, the industry's net sales value of \$***, its COGS-to-net-sales ratio of *** percent, its operating income of \$***, and its operating income margin of *** percent, were all an improvement over 2018.¹²¹ This limited information is insufficient for us to make a finding as to whether the domestic industry is vulnerable to continuation or recurrence of material injury in the event of revocation of the orders.

¹¹⁶ Original Determinations, USITC Pub. 5001 at 23.

¹¹⁷ CR/PR at Table 1.3. Domestic industry data is understated in these reviews relative to the original investigations because the data coverage of the domestic industry is lower in these reviews than in the original investigations, as discussed in section III.B.1 above.

¹¹⁸ CR/PR at Table 1.3. In 2018, the domestic industry's capacity was 528.8 million pounds, its production was 373.0 million pounds, and its U.S. commercial shipments were 329.0 million pounds.

¹¹⁹ CR/PR at Table 1.3. In 2018, the domestic industry's capacity utilization was 70.5 percent, and the AUV of its U.S. shipments was \$1.99 per pound. *Id.*

¹²⁰ CR/PR at Table 1.5. In 2018, the domestic industry's share of U.S. consumption was 69.4 percent by quantity. *Id.*

¹²¹ CR/PR at Table 1.3. In 2018, the domestic industry's net sales value was \$741.1 million, its COGS-to-net-sales ratio was 88.0 percent, its operating income was \$19.6 million, and its operating income margin was 2.6 percent. *Id.*

In addition, in 2023, the domestic industry's gross profit was \$***, and its SG&A expenses were \$***, which are both higher than in 2018, when the industry's gross profit was \$89.3 million, and its SG&A expenses were \$69.7 million. *Id.*

Based on the information available in this review, we find that revocation of the orders would likely result in a significant increase in subject import volume that would likely undersell the domestic like product to a significant degree. Given the high degree of substitutability between the domestic like product and subject imports and the importance of price to purchasers, significant volumes of low-priced subject imports would likely significantly undersell the domestic like product and capture sales and market share from the domestic industry and/or significantly depress or suppress prices for the domestic like product. The likely significant volume of imports and their significant price effects would likely have a significant adverse impact on the domestic industry's production, shipments, sales, market share, and revenues, which in turn would have a direct adverse impact on the domestic industry's profitability and employment, as well as its ability to raise capital and make and maintain necessary capital investments.

We have also considered the role of factors other than subject imports, including the presence of nonsubject imports, so as not to attribute injury from other factors to the subject imports. The volume of nonsubject imports increased significantly over the period of review from *** pounds in 2019 to *** pounds in 2023, and nonsubject imports accounted for *** percent of apparent U.S. consumption in 2023, up from *** in 2018.¹²² However, as noted above, a substantial portion of the increase in nonsubject import volume over the 2019-2023 period consisted of imports from South Korea and Vietnam that were subject to Commerce's affirmative circumvention finding, and thus of Chinese origin.¹²³ Even to the extent that nonsubject import market share increased over the period of review, however, the information available in these reviews shows that nonsubject imports did not prevent the domestic industry's financial performance from being stronger in 2023 than in the original investigations, due to the disciplining effects of the orders.¹²⁴ Furthermore, the record provides no indication that the presence of nonsubject imports would prevent subject imports from entering the U.S. market in significant quantities or adversely affecting domestic prices after revocation of the orders. Given that the domestic industry accounted for *** percent of apparent U.S. consumption by quantity in 2023,¹²⁵ as well as the high degree of substitutability between subject imports and the domestic like product and the importance of price to purchasing decisions, the significant increase in subject imports that we have found likely after revocation

¹²² CR/PR at Tables 1.4 & 1.5.

¹²³ South Korea Circumvention Decision Memorandum at 1-2; Vietnam Circumvention Decision Memorandum at 1-2; *Southwire Response* at 7-8, 12 & Ex. 3.

¹²⁴ CR/PR at Table 1.3.

¹²⁵ CR/PR at Table 1.5.

would come at least in part at the domestic industry's expense, or else force domestic producers to lower their prices or forgo price increases in order to retain market share. Consequently, we find that any future effects of nonsubject imports would be distinct from the likely effects attributable to subject imports and that nonsubject imports would not prevent subject imports from having a significant impact on the domestic industry.

We recognize that apparent U.S. consumption was *** percent lower in 2023 than in 2018.¹²⁶ As noted in section III.B.1 above, however, the lower level of apparent U.S. consumption in 2023 as compared to 2018 is partly a function of lower data coverage of the domestic industry in these reviews compared to the original investigations. In addition, and contrary to this apparent decline, Encore estimates that apparent U.S. consumption has significantly increased since 2018, and Southwire and responding purchaser *** indicate that there have been no changes in demand conditions since 2018.¹²⁷ To the extent that demand weakens or declines, the significant volume of low-priced subject imports that is likely after revocation would exacerbate the effects of weak or declining demand on the domestic industry. Moreover, any decline in demand for AWC would be unlikely to explain any loss in market share. Given these considerations, we find that the likely effects attributable to subject imports are distinguishable from any likely effects of demand if the orders were revoked.

In sum, we conclude that if the antidumping and countervailing duty orders on AWC from China were revoked, subject imports would likely have a significant impact on the domestic industry within a reasonably foreseeable time.

IV. Conclusion

For the foregoing reasons, we determine that revocation of the antidumping and countervailing duty orders on AWC from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

¹²⁶ *Derived from* CR/PR at Table 1.5.

¹²⁷ Encore Response at 17 n.62, 18 & Ex. 1; Southwire Response at 13-14; CR/PR at D.3.

Information obtained in these reviews

Background

Table 1.1

On November 1, 2024, the U.S. International Trade Commission ("Commission") gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended ("the Act"),¹ that it had instituted reviews to determine whether revocation of the antidumping and countervailing duty orders on aluminum wire and cable ("AWC") from China would likely lead to the continuation or recurrence of material injury to a domestic industry.² All interested parties were requested to respond to this notice by submitting certain information requested by the Commission.^{3 4} Table 1.1 presents information relating to the background and schedule of this proceeding:

Effective date	Action
November 1, 2024	Notice of initiation by Commission (89 FR 87401, November 1, 2024)
November 4, 2024	Notice of institution by Commerce (89 FR 87543, November 4, 2024)
February 4, 2025	Commission's vote on adequacy
March 11, 2025	Commerce's results of its expedited reviews
June 9, 2025	Commission's determinations and views

AWC: Information relating to the background and schedule of this proceeding

The original investigations

The original investigations resulted from petitions filed on September 21, 2018 with Commerce and the Commission by Encore Wire Corporation ("Encore"), McKinney, Texas, and

¹ 19 U.S.C. 1675(c).

² 89 FR 87401, November 1, 2024. In accordance with section 751(c) of the Act, the U.S. Department of Commerce ("Commerce") published a notice of initiation of five-year reviews of the subject antidumping and countervailing duty orders. 89 FR 87543, November 4, 2024. Pertinent Federal Register notices are referenced in app. A, and may be found at the Commission's website (www.usitc.gov).

³ As part of their response to the notice of institution, interested parties were requested to provide company-specific information. Information regarding responses to the notice of institution is presented in app. B. Summary data compiled in the original investigations are presented in app. C.

⁴ Interested parties were also requested to provide a list of three to five leading purchasers in the U.S. market for the domestic like product and the subject merchandise. Presented in app. D are the responses received from purchaser surveys transmitted to the purchasers identified in this proceeding.

Southwire Company, LLC ("Southwire"), Carrollton, Georgia.⁵ On October 30, 2019, Commerce determined that imports of aluminum wire and cable ("AWC") from China were being sold at less than fair value ("LTFV") and subsidized by the Government of China.⁶ The Commission determined on December 16, 2019 that the domestic industry was materially injured by reason of LTFV and subsidized imports of AWC from China.⁷ On December 23, 2019, Commerce issued its antidumping and countervailing duty orders with final weighted-average dumping margins ranging from 58.51 to 63.47 percent and net subsidy rates ranging from 33.44 to 165.63 percent.⁸

Previous and related investigations

AWC has not been the subject of any prior related antidumping or countervailing duty investigations in the United States.

Commerce's five-year reviews

Commerce announced that it would conduct expedited reviews with respect to the orders on imports of AWC from China with the intent of issuing the final results of these reviews based on the facts available not later than April 25, 2025.⁹ Commerce publishes its Issues and Decision Memoranda and its final results concurrently, accessible upon publication at <u>https://access.trade.gov/public/FRNoticesListLayout.aspx</u> and subsequently on the Commission's Electronic Document Information System ("EDIS"). Issues and Decision Memoranda contain complete and up-to-date information regarding the background and history of the order, including scope rulings, duty absorption, changed circumstances reviews, and anticircumvention, as well as any decisions that may have been pending at the issuance of this report. Any foreign producers/exporters that are not currently subject to the antidumping or countervailing duty orders on imports of AWC from China are noted in the sections titled "The original investigations" and "U.S. imports," if applicable.

⁵ Aluminum Wire and Cable from China, Inv. Nos. 701-TA-611 and 731-TA-1428 (Final), USITC Publication 5001, December 2019 ("Original publication"), p. 1.1.

⁶ 84 FR 58134, October 30, 2019 and 84 FR 58137, October 30, 2019.

⁷ 84 FR 70210, December 20, 2019.

⁸ 84 FR 70496, December 23, 2019

⁹ Letter from Howard Smith, Acting Director, Office IV, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, December 26, 2024.

The product

Commerce's scope

Commerce has defined the scope as follows:

The scope of these orders covers aluminum wire and cable, which is defined as an assembly of one or more electrical conductors made from 8000 Series Aluminum Alloys (defined in accordance with ASTM B800), Aluminum Alloy 1350 (defined in accordance with ASTM B230/B230M or B609/B609M), and/or Aluminum Alloy 6201 (defined in accordance with ASTM B398/B398M), provided that: (1) At least one of the electrical conductors is insulated; (2) each insulated electrical conductor has a voltage rating greater than 80 volts and not exceeding 1000 volts; and (3) at least one electrical conductor is stranded and has a size not less than 16.5 thousand circular mil (kcmil) and not greater than 1000 kcmil. The assembly may: (1) Include a grounding or neutral conductor; (2) be clad with aluminum, steel, or other base metal; or (3) include a steel support center wire, one or more connectors, a tape shield, a jacket or other covering, and/or filler materials.

Most aluminum wire and cable AWCs conform to National Electrical Code (NEC) types THHN, THWN, THWN-2, XHHW-2, USE, USE-2, RHH, RHW, or RHW-2, and also conform to Underwriters Laboratories (UL) standards UL-44, UL-83, UL-758, UL-854, UL-1063, UL-1277, UL-1569, UL-1581, or UL-4703, but such conformity is not required for the merchandise to be included within the scope.

The scope of the orders specifically excludes aluminum wire and cable AWCs in lengths less than six feet, whether or not included in equipment already assembled at the time of importation.¹⁰

¹⁰ 84 FR 70496, December 23, 2019.

U.S. tariff treatment

AWC is currently provided for in Harmonized Tariff Schedule of the United States ("HTS") subheading 8544.49.90 which covers insulated electric conductors of various types, other than for copper, when they are for a voltage not exceeding 1,000 V and are not fitted with connectors. AWC may also be imported under HTS statistical reporting number 8544.42.9090 which covers similar electrical conductors fitted with connectors, other than extension cords and conductors for telecommunications. The general rate of duty is 3.9 percent ad valorem for HTS subheading 8544.49.90 and 2.6 percent ad valorem for HTS subheading 8544.42.90.¹¹ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Effective July 6, 2018, AWC originating in China is subject to an additional 25 percent ad valorem duty under section 301 of the Trade Act of 1974.¹²

HTS subheadings 8544.49.90 and HTS 8544.42.9090 were not included in the enumeration of the aluminum articles subject to the additional 10 percent ad valorem duty under Section 232 of the Trade Expansion Act of 1962, as amended.¹³

Description and uses¹⁴

AWC products consist of one or more electrical conductors of one or more aluminum alloys.¹⁵ While aluminum wire typically refers to a single stranded conductor, cable typically contains two or more conductors that are combined.¹⁶ AWC may or may not include a neutral or grounding conductor made of aluminum or copper, and may include a metal or fiber-optic element typically used for signal transmission. For AWCs that have multiple conductors, the conductors may be combined in different ways such as twisted, or laid flat with a jacket around them, sometimes referred to as "cabling" (figure 1.2). Stranding improves AWC's flexibility and

¹¹ USITC, HTS (2024) Basic Revision 10, Publication 5569, November 2024, pp. 85.84.

¹² 83 FR 28710, June 20, 2018. See also HTS heading 9903.88.01 and U.S. notes 20(a) and 20(b) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2024) Basic Revision 10, USITC Publication 5569, July 2022, pp. 99-III-18–99-III-23, 99-III-293.

¹³ Presidential Proclamation 9704, March 8, 2018, 83 FR 11619, March 15, 2018. See U.S. notes 19(a) and 19(b), subchapter III of chapter 99. USITC, HTS (2024) Basic Revision 10, USITC Publication 5569, July 2022, pp. 99-III-12, 99-III-13, 99-III-97.

¹⁴ Unless otherwise noted, this information is based on Original publication, pp. 1.9 to 1.12.

¹⁵ An electrical conductor is an item or material that allows electricity to flow through it. Britannica, "Conductor Summary," retrieved December 12, 2024, <u>https://www.britannica.com/summary/conductor-music</u>. Aluminum alloy series used in AWC include 8000, 6201, and 1350.

¹⁶ The term "stranded" denotes wires that have been bundled or wrapped together.

strength while preserving its capacity to carry electrical current. Manufacturers commonly rely on their own proprietary stranding processes and configurations.

Figure 1.2

AWC: Cross sectional view of an insulated aluminum cable showing three concentric layers of stranded conductor wires



Source: Petitioners' postconference brief in response to the original investigation, "Responses to Questions from Commission Staff," p. 2.16.

AWC end-use applications rely on aluminum's relatively high thermal and electrical conductivities to transmit electrical power in industrial, commercial, and residential applications.¹⁷ The combined physical characteristics of AWC products influence the specific application(s) for which they are suited, including either above-ground or underground; and either interior or exterior building applications. Compared to copper, aluminum is more suitable for overhead power-transmission cables due to its lighter weight. Aluminum is also more suitable for long-distance, underground power-transmission cables, due to its lower cost.

AWC is generally categorized into three end-use segments of "feeder," "intermediate," and "circuit" wiring. Feeder wiring routes electric power from the utility pole to the meter base and from the meter base to the distribution panel board of a building. Approximately 80 percent of AWC sales are to the feeder segment. Intermediate wiring, which includes branch circuits throughout a building, constitutes about 20 percent of AWC sales.¹⁸ By contrast, smaller-diameter circuit wiring is made almost exclusively of copper, especially for use in residential buildings due to electrical-code requirements. According to an importer of AWC from the previous investigation, despite code restrictions, AWC is substitutable for copper wire and cable in almost all applications.

AWC is typically rated at 600 volts. The aluminum alloys used in AWC provide different combinations of electrical conductivity and tensile strength which makes them more or less

¹⁷ Most AWC is sold into industrial and commercial applications with an estimated ten percent sold into residential applications.

¹⁸ In commercial applications, intermediate wiring can be of either copper or aluminum.

suitable for a particular application. For example, alloy 1350 has relatively high conductivity but lower strength compared to other alloys.

AWC within the scope of these investigations is distinguished by having at least one electrical conductor that is insulated. Such insulation includes black or colored polyvinyl chloride ("PVC") or cross-link polyethylene ("XLPE"), and may vary in thickness. The type and thickness of the insulation influences the moisture and heat resistance characteristics of the AWC. PVC insulation is often used when resistance to sunlight is important, while thicker or higher-grade insulation (e.g., XLPE) is needed for higher-voltage applications. The insulation may be covered with a nylon sheath to enhance the AWC's resistance to oil and gas. AWC may also be covered with aluminum or steel cladding armor to further protect the AWC from abrasions, cutting, or chemical reactions.

The industry designates standard AWC types with each having distinct combinations of the features, described above, as appropriate to their intended end use(s). Moreover, each type typically conforms to one or more UL standards and/or National Electrical Code ("NEC") specifications, which denote temperature ratings, voltage, wet or dry conditions ratings, or other product attributes.

AWC types are standardized across the industry, with all AWC of a given type being interchangeable and substitutable, regardless of the manufacturer. All AWC is designated by a specific part number, shared across all manufacturers. Suppliers can provide co-mingled AWC, having a common part number, of both U.S. and foreign origin. AWCs are typically marked with an E-number which can be used to track the product back to its original manufacturer, or in the case of certain imported products, its original supplier. If an AWC does not bear a manufacturer's brand name or a supplier's manufacturer-specific E- number, it may be difficult to identify where it was produced.

Manufacturing process¹⁹

AWC firms start with unwrought aluminum rod as the feedstock for the multi-stage manufacturing process with up to nine distinctive steps, described below.²⁰

(1) Drawing— Coiled, unwrought aluminum rod is lubricated prior to being pulled through a series of successively smaller-diameter dies to reduce its cross section into circular or trapezoidal-shaped strands.

¹⁹ Unless otherwise noted, this information is based on Original publication, pp. 1.9 to 1.12.

²⁰ AWC manufacturers either produce their own aluminum rod in-house or purchase it from outside suppliers.

(2) Annealing— Work-hardened, drawn aluminum must be annealed to soften it and restore its ductility by batch annealing in furnaces at 800-900° F for several hours, followed by controlled cooling back to room temperature.

(3) Stranding— Individual wires are laid down on a common axis as the stranding machine's head rotates to form a single strand. To form a six-wire system, six strands are wound around a center strand. Additional layers are arranged around the first 7 strands in a progression of 12 strands in the second layer, 18 strands in the third layer, and 24 strands in the fourth layer. Other systems for compact strand conductors may omit the center strand and lay the strands in progression of 5 strands, 9 strands, 15 strand, etc., Stranding improves the flexibility of the wires while preserving their electrical current-carrying capacity. Compact stranded conductors have unique shapes so that when they are combined, they form a round configuration. AWC manufacturers commonly produce their own proprietary stranded configurations.

(4) Insulating— Insulation is applied typically by pressure-extruding PVC or XLPE onto the stranded wire at high temperature. The insulation also may be covered by a layer of extruded nylon. Insulation helps to protect AWC against corrosion and prevents electrical currents from contacting other conductors. Insulation is also typically colored to create distinction when multiple sets of wires are running together.²¹

(5) Cabling— Two or more individual conductors may be cabled (twisted together) with other conductors to achieve the desired features of the finished product. For example, combinations of individual conductors may be twisted together with conductors of the same size and type, with different (e.g., insulated ground or neutral) conductors, or with uninsulated supporting neutral conductors.

(6) Armoring— Cabled or parallel conductors can be armored by wrapping them with a separator tape and covering them with interlocked aluminum or steel cladding armor. Armoring is intended to provide an extra layer of protection from breakage or other physical damage.²²

(7) Jacketing— Conductors or armored cable may also be jacketed with a PVC or other jacketing material. A jacket may be applied over combinations of individual conductors that may be left parallel without twisting, with non-metallic fillers added to fill-in the indentations formed by the curvature of the conductors so that the cable assembly is as round as possible. Jacketing

²¹ Performance Wire & Cable, Inc. "Insulated Wire, What's Protecting Your Cable?" retrieved December 12, 2024, <u>https://www.performancewire.com/insulated-wire-whats-protecting-your-cable/</u>.

²² Allied Wire & Cable, "All About Cable Armor," retrieved December 20, 2024, <u>https://www.awcwire.com/customersupport/techinfo/cable-</u> armor?srsltid=AfmBOogW94eu8OWGQobjVu3EWjFW24XEowJ91UEXo3vFsozR0vgiGBA4.

holds the cable together while adding another extra layer of protection against environmental damage.

(8) Testing— Machine operators and quality-control inspectors conduct routine product inspections. Finished cables typically undergo electrical-continuity testing to ensure compliance with the manufacturer's own quality standards and those of UL.

(9) Packaging— Finished cable is either wound onto reels or coiled and shrink-wrapped for shipment. AWC may also be cut to length at a customer's request.

According to Petitioners' and witnesses in the original investigation, firms cannot readily switch to producing copper wire and cable on their AWC equipment without significant additional change-over costs and down-time due to the different physical characteristics of the two metals.

The industry in the United States

U.S. producers

During the final phase of the original investigation, the Commission received U.S. producer questionnaires from five firms, which accounted for all production of AWC in the United States during 2018.²³

In response to the Commission's notice of institution in these current reviews, domestic interested parties provided a list of five known and currently operating U.S. producers of AWC. Two firms providing U.S. industry data in response to the Commission's notice of institution accounted for approximately *** percent of production of AWC in the United States during 2018.²⁴

²³ Original publication, p. 3.1.

²⁴ Domestic interested parties' response to the notice of institution, December 2, 2024, app. B.

Recent developments

Table 1.2 presents events in the U.S. industry since the Commission's original investigations. $^{\rm 25}$

ltem	Firm	Event
Closure	Southwire	In January 2020, Southwire announced that it would be closing its plant in Hayesville, North Carolina at the end of March 2020. The plants wire and cable operations were moved to other Southwire facilities. This facility is not confirmed to have in-scope AWC production.
Closure	Nexans	In September 2020, Nexans announced the closure of its cable plant in Chester, New York.
Expansion	Prysmian	In November 2022, Prysmian announced a 115,000 square foot expansion of its facility in Sedalia, Missouri. The company will invest more than \$45 million in the expansion.
Plant opening	Cerrowire	In April 2023, Cerrowire opened a new 270,000 square foot metal clad wire plant. Additional construction is expected to be completed by the end of 2024. Production is expected to increase from 450,000 pounds per month to approximately 3 million pounds per month when the project is completed.
Expansion	Prysmian	In April 2023, Prysmian announced a 51,000 square foot expansion of its facility in Williamsport, PA. The project is expected to cost \$22.5 million and received grants worth \$135,000 and \$125,000 from Pennsylvania First and the City of Williamsport, respectively. The project also received a \$3.89 million Qualifying Advanced Energy Project Credit from the U.S. Department of Energy.
Expansion	Southwire	In June 2023, Southwire announced a 340,000 square foot expansion of its facility in Florence, Alabama. The facility focuses on production of residential and commercial building wire. Construction is expected to be completed in 2025. This facility is not confirmed to have in-scope AWC production
Expansion	Southwire	In May 2024, Southwire announced an expansion of its Cofer Technology Center in Carrollton, Georgia, which focuses on R&D. The 50,000 square foot expansion will include a manufacturing line for new wire samples. The company's press release notes that the industry is experiencing "unprecedented growth driven by a global focus on sustainability, renewables, electric vehicles, and grid transformation."
Acquisition	Prysmian/ Encore Wire	In July 2024, Prysmian completed its acquisition of Encore Wire. Encore's facility is located in McKinney, Texas.

Table 1.2 AWC: Develo	pments in the	U.S.	industry
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²⁵ For recent developments, if any, in tariff treatment, please see "U.S. tariff treatment" section.

Item	Firm	Event
Plant	Southwire	In November 2024, Southwire announced the construction of a new, larger facility
opening		to replace its current operations in Youngsville, North Carolina.
		The new 170,000 square foot facility, also in Youngsville, will be approximately
		three times the size of the facility it is replacing. The move to the new facility is
		expected to be completed by the end of 2024. The facility manufactures product
		for the company's Electrical Products and Engineered Solutions business. It is
		not confirmed to have in-scope AWC production.

Source: Southwire, "Southwire Announces Closure of Hayesville Plant," January 30, 2020, <u>https://www.southwire.com/blogs/hayesville-plant-closure</u>; Times Herald-Record, "75-Year-Old Chester Cable Maker to Close, Nearly 200 to be Laid Off," September 3, 2020,

https://www.recordonline.com/story/news/2020/09/03/nexans-to-close-chester-and-town-wallkill-facilitiesand-nearly-200-will-be-laid-off/5700218002/; Sedalia Pettis County Economic Development, "Prysmian

Group Announces over \$45 Million Investment to Enhanced Manufacturing Facility in Sedalia, Mo," November 16, 2022, <u>https://www.sedaliamoed.com/prysmian-group-announces-over-45-million-investment-to-enhance-manufacturing-facility-in-sedalia-mo/;</u> Business Alabama, Cerrowire Expansion Brings Jobs, Opportunities for North Alabama Community," September 19, 2023, <u>https://businessalabama.com/cerrowire-expansion-brings-jobs-opportunities-for-north-alabama-community</u>; Pennsylvania Department of Community

<u>expansion-brings-jobs-opportunities-for-north-alabama-community/</u>; Pennsylvania Department of Community
 & Economic Development, "Governor Josh Shapiro Announces Prysmian Group North America to Invest
 \$22.5 Million in Williamsport Manufacturing Expansion," April 26, 2023,

https://dced.pa.gov/newsroom/governor-josh-shapiro-announces-prysmian-group-north-america-to-invest-22-5-million-in-williamsport-manufacturing-expansion/; Prysmian, "Prysmian's Willamsport Facility Named as Key Expansion in U.S. DOE Advanced Energy Projects," April 30, 2023,

https://na.prysmian.com/resources/press-release/prysmians-williamsport-facility-named-as-key-expansion-in-US-DOE-advanced-energy-projects; Prysmian, "Prysmian Group Hosts Beam Signing Ceremony on \$22.5M Williamsport Facility Expansion Project," July 19, 2023, <u>https://na.prysmian.com/press-release/prysmian-group-hosts-beam-signing-ceremony-on-22-5-million-dollar-williamsport-facility-expansion-project</u>.

Southwire, "Southwire Announces Expansion in Florence, Ala," June 9, 2023,

https://www.southwire.com/blogs/florence-expansion; Southwire, "Southwire Announces Expansion of Cofer Technology Center Research and Development Facility," May 14, 2024,

<u>https://www.southwire.com/blogs/cofer-center-expansion;</u> Encore Wire, "Prysmian Completes the Acquisition of Encore Wire," July 2, 2024, <u>https://www.encorewire.com/press-releases/2024-07-02-acquisition.html;</u> Southwire, "Southwire Announces Expansion of Youngsville Facility," November 18, 2024, https://www.southwire.com/blogs/youngsville-expansion-announcement.

U.S. producers' trade and financial data

The Commission asked domestic interested parties to provide trade and financial data in their response to the notice of institution in the current five-year reviews. Table 1.3 presents a compilation of the trade and financial data submitted from all responding U.S. producers in the original investigations.

Table 1.3AWC: Trade and financial data submitted by U.S. producers, by period

Item	Measure	2016	2017	2018	2023
Capacity	Quantity	519,353	529,030	528,773	***
Production	Quantity	346,777	366,732	372,979	***
Capacity utilization	Ratio	66.8	69.3	70.5	***
U.S. shipments	Quantity	316,423	326,692	329,031	***
U.S. shipments	Value	583,279	615,983	654,231	***
U.S. shipments	Unit value	1.84	1.89	1.99	***
Net sales	Value	654,473	695,642	741,072	***
COGS	Value	541,860	599,628	651,793	***
COGS to net sales	Ratio	82.8	86.2	88.0	***
Gross profit or (loss)	Value	112,612	96,014	89,279	***
SG&A expenses	Value	69,963	63,432	69,673	***
Operating income or (loss)	Value	42,649	32,582	19,606	***
Operating income or (loss) to net sales	Ratio	6.5	4.7	2.6	***

Source: For the year 2023, data are compiled using data submitted by domestic interested parties. Domestic interested parties' response to the notice of institution, November 1, 2024, exh. 1.

Note: For a discussion of data coverage, please see "U.S. producers" section.

Definitions of the domestic like product and domestic industry

The domestic like product is defined as the domestically produced product or products which are like, or in the absence of like, most similar in characteristics and uses with, the subject merchandise. The domestic industry is defined as the U.S. producers as a whole of the domestic like product, or those producers whose collective output of the domestic like product constitutes a major proportion of the total domestic production of the product. Under the related parties provision, the Commission may exclude a U.S. producer from the domestic industry for purposes of its injury determination if "appropriate circumstances" exist.²⁶

In its original determinations, the Commission defined a single domestic like product consisting of aluminum wire and cable, coextensive with Commerce's scope. In its original determinations, the Commission defined the domestic industry to include all U.S. producers of aluminum wire and cable.²⁷

U.S. importers

During the final phase of the original investigations, the Commission received U.S. importer questionnaires from 14 firms, which accounted for approximately *** percent of total U.S. imports of AWC from China during 2018.²⁸ Import data presented in the original investigation are based on questionnaire responses.

Although the Commission did not receive responses from any respondent interested parties in these current reviews, in its response to the Commission's notice of institution, the domestic interested parties provided a list of 15 potential U.S. importers of AWC.²⁹

²⁶ Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).

²⁷ 89 FR 87401, November 1, 2024.

²⁸ Aluminum Wire and Cable from China Staff Report (Final), Confidential Report, INV-RR-117, November

^{6, 2019 (&}quot;Original confidential report"), p. 4.1 fn. 3.

²⁹ Domestic interested parties' response to the notice of institution, December 2, 2024, app. B.

U.S. imports

Table 1.4 presents the quantity, value, and unit value of U.S. imports from China as well as the other top sources of U.S. imports (shown in descending order of 2023 imports by quantity).

Table 1.4 AWC: U.S. imports, by source and period

U.S. imports from	Measure	2019	2020	2021	2022	2023
China	Quantity	1,337	8,761	7,758	1,960	1,547
Cambodia	Quantity	925	5,832	13,740	20,955	20,987
South Korea	Quantity	746	1,291	3,949	12,833	15,079
Mexico	Quantity	10,039	12,892	11,965	8,887	13,854
All other sources	Quantity	21,570	28,062	33,917	47,136	45,074
Nonsubject sources	Quantity	33,281	48,076	63,570	89,811	94,994
All import sources	Quantity	34,617	56,837	71,328	91,772	96,540
China	Value	23,203	79,573	82,101	51,712	34,827
Cambodia	Value	5,692	35,156	91,615	211,444	187,112
South Korea	Value	12,099	17,565	38,855	136,272	150,121
Mexico	Value	88,984	112,819	154,961	141,384	208,364
All other sources	Value	243,914	265,703	386,408	584,156	584,959
Nonsubject sources	Value	350,689	431,243	671,840	1,073,256	1,130,556
All import sources	Value	373,892	510,816	753,942	1,124,967	1,165,383
China	Unit value	17.35	9.08	10.58	26.38	22.51
Cambodia	Unit value	6.15	6.03	6.67	10.09	8.92
South Korea	Unit value	16.22	13.61	9.84	10.62	9.96
Mexico	Unit value	8.86	8.75	12.95	15.91	15.04
All other sources	Unit value	11.31	9.47	11.39	12.39	12.98
Nonsubject sources	Unit value	10.54	8.97	10.57	11.95	11.90
All import sources	Unit value	10.80	8.99	10.57	12.26	12.07

Source: Compiled from official Commerce statistics for HTS statistical reporting number 8544.49.9000, accessed December 18, 2024. These data may be overstated as HTS statistical reporting number 8544.49.9000 may contain products outside the scope of these reviews.

Note: Because of rounding, figure may not add to total shown.

Apparent U.S. consumption and market shares

Table 1.5 presents data on U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares.

Table 1.5 AWC: Apparent U.S. consumption and market shares, by source and period

Quantity in 1,000 pounds; value in 1,000 dollars; shares in percent

Source	Measure	2016	2017	2018	2023
U.S. producers	Quantity	316,423	326,692	329,031	***
China	Quantity	***	81,933	85,295	1,547
Nonsubject sources	Quantity	***	58,193	59,620	94,994
All import sources	Quantity	113,841	140,126	144,915	96,540
Apparent U.S. consumption	Quantity	430,264	466,818	473,946	***
U.S. producers	Value	583,279	615,983	654,231	***
China	Value	***	147,209	166,413	34,827
Nonsubject sources	Value	***	110,575	116,722	1,130,556
All import sources	Value	221,589	257,783	283,135	1,165,383
Apparent U.S. consumption	Value	804,868	873,766	937,367	***
U.S. producers	Share of quantity	73.5	70.0	69.4	***
China	Share of quantity	***	17.6	18.0	***
Nonsubject sources	Share of quantity	***	12.5	12.6	***
All import sources	Share of quantity	26.5	30.0	30.6	***
U.S. producers	Share of value	72.5	70.5	69.8	***
China	Share of value	***	16.8	17.8	***
Nonsubject sources	Share of value	***	12.7	12.5	***
All import sources	Share of value	27.5	29.5	30.2	***

Source: For the years 2016-18, data are compiled using data submitted in the Commission's original investigations. For the year 2023, U.S. producers' U.S. shipments are compiled from the domestic interested parties' response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics under HTS statistical reporting number 8544.49.9000, accessed December 18, 2024.

Note: Share of quantity is the share of apparent U.S. consumption by quantity in percent; share of value is the share of apparent U.S. consumption by value in percent.

Note: For 2016-18, apparent U.S. consumption is derived from U.S. shipments of imports, rather than U.S. imports.

Note: For a discussion of data coverage, please see "U.S. producers" and "U.S. importers" sections.

The industry in China

Producers in China

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from one firm, which accounted for approximately *** percent of production of AWC in China during 2018, and whose exports to the United States accounted for approximately *** percent of U.S. imports of AWC from China during 2018.³⁰

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a list of 32 possible producers of AWC in China.³¹

Recent developments

There were no major developments in the Chinese industry since the imposition of the orders identified by interested parties in the proceeding and no relevant information from outside sources was found.

³⁰ Original confidential report, p. 7.3.

³¹ Domestic interested parties' response to the notice of institution, December 2, 2024, exh. 1.

Exports

Table 1.6 presents export data for insulated conductors, a category that includes AWC and out-of-scope products, from China (by export destination in descending order of quantity for 2023).

			<u>.</u>		
Table 1.6 Insulated conductors: Quantity	y of ex	ports from	China, t	by destination and	period

Destination market	2019	2020	2021	2022	2023
Australia	138,219	150,591	176,398	159,101	178,168
Vietnam	145,108	136,453	132,632	123,141	119,251
Philippines	115,418	83,780	110,670	102,026	100,352
Indonesia	77,258	68,378	71,531	96,981	96,637
United States	74,680	66,925	87,172	98,069	89,970
Hong Kong	92,445	76,144	83,740	93,206	82,410
Singapore	92,752	104,204	54,593	57,046	61,026
Thailand	48,901	53,768	59,491	53,019	57,677
Ghana	18,101	24,044	23,653	15,809	54,599
United Arab Emirates	45,271	36,793	46,120	50,733	53,585
All other markets	860,911	775,033	907,048	929,066	1,047,175
All markets	1,709,064	1,576,111	1,753,047	1,778,197	1,940,849

Quantity in 1,000 pounds

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 8544.49, accessed December 10, 2024. These data may be overstated as HS subheading 8544.49 may contain products outside the scope of these reviews.

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

Third-country trade actions

Based on available information, AWC from China has not been subject to other antidumping or countervailing duty investigations outside the United States.³²

³² WTO, "Trade Remedies Data Portal," retrieved December 16, 2024, <u>https://trade-remedies.wto.org/en</u>.

The global market

Table 1.7 presents global export data for insulated conductors, a category that includes AWC and out-of-scope products, (by source in descending order of value for 2023).

Exporting country	2019	2020	2021	2022	2023
China	4,604,942	4,237,154	5,746,795	6,343,667	6,408,43
Germany	2,416,150	2,263,487	3,063,172	3,263,306	3,348,99
United States	2,382,027	2,007,254	2,585,539	3,225,127	3,201,29
Italy	1,883,879	1,833,524	2,868,372	2,960,550	2,890,82
Turkey	1,462,981	1,458,635	2,189,327	2,428,605	2,292,72
Mexico	1,102,262	1,039,125	1,214,078	1,462,905	1,965,19
South Korea	831,568	888,359	985,926	1,285,175	1,329,03
Spain	716,838	605,606	910,234	998,956	1,100,55
Czech Republic	680,423	621,510	907,678	942,238	1,018,36
France	886,872	731,222	996,705	1,041,713	962,19
All other exporters	11,817,800	10,715,092	14,539,715	15,778,457	14,989,37
All exporters	28,785,741	26,400,967	36,007,541	39,730,698	39,506,92

Table 1.7 Insulated conductors: Value of global exports by country and period

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 8544.49. These data may be overstated as HS subheading 8544.49 may contain products outside the scope of these reviews.

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

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
89 FR 87401 November 1, 2024	Aluminum Wire and Cable From China; Institution of Five-Year Reviews	https://www.govinfo.gov/content/pkg/FR-2024- 11-01/pdf/2024-25101.pdf
89 FR 87543 November 4, 2024	Initiation of Five-Year (Sunset) Reviews	https://www.govinfo.gov/content/pkg/FR-2024- 11-04/pdf/2024-25610.pdf

APPENDIX B

RESPONSES TO THE NOTICE OF INSTITUTION

Responses to the Commission's notice of institution

Individual responses

The Commission received two submissions in response to its notice of institution in the subject reviews. They were filed on behalf of the following entities, collectively referred to herein as "domestic interested parties":

- 1. Encore Wire Corporation ("Encore"), domestic producer of aluminum wire and cable
- 2. Southwire Company, LLC ("Southwire"), domestic producer of aluminum wire and cable

A complete response to the Commission's notice of institution requires that the responding interested party submit to the Commission all the information listed in the notice. Responding firms are given an opportunity to remedy or explain deficiencies in their responses and to provide clarifying details where appropriate. A summary of the number of responses and estimates of coverage for each is shown in table B.1.

Table B.1 Aluminum Wire and Cable: Summary of responses to the Commission's notice of institution

Interested party type	Number	Coverage			
U.S. producer	2	***%			
Neter The LLO much service a firmer and firmer and so the demonstration interacted a set is a structure of the sign					

Note: The U.S. producer coverage figure presented is the domestic interested parties' estimate of their share of total U.S. production of aluminum wire and cable during 2023. Domestic interested parties' response to the notice of institution, December 2, 2024, exh. 1.

Party comments on adequacy

The Commission received party comments on the adequacy of responses to the notice of institution and whether the Commission should conduct expedited or full reviews from Encore and Southwire. Encore requests that the Commission conduct expedited reviews of the antidumping and countervailing duty orders on aluminum wire and cable from China. Southwire requests that the Commission conduct expedited reviews of the antidumping and counterval or the aluminum wire and cable from China.

¹ Encore's comments on adequacy, January 2, 2025, p. 4 and Southwire's comments on adequacy, January 2, 2025, pp. 4-5.

Company-specific information

Table B.2 Aluminum wire and cable: Response checklist for U.S. producers

Yes = provided response; no = did not provide a response; NA = not available; not known = information was not known

Item	Encore	Southwire
Nature of operation	Yes	Yes
Statement of intent to participate	Yes	Yes
Statement of likely effects of revoking the order	Yes	Yes
U.S. producer list	Yes	Yes
U.S. importer/foreign producer list	Yes	Yes
List of 3-5 leading purchasers	Yes	Yes
List of sources for national/regional prices	Yes	Not known
Trade/financial data	Yes	Yes
Changes in supply/demand	Yes	Yes
Complete response	Yes	Yes

APPENDIX C

SUMMARY DATA COMPILED IN PREVIOUS PROCEEDINGS

Table C-1 AWC: Summary data concerning the U.S. market, 2016-18, January to June 2018, and January to June 2019

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

_	Reported data				Period changes				
	Calendar year 2016 2017		January to June		Calendar year 2016-18 2016-17 2017-18			Jan-Jun	
	2010	2017	2018	2018	2019	2016-18	2010-17	2017-18	2018-19
U.S. consumption quantity:									
Amount	430,264	466,818	473,946	236,018	241,028	▲10.2	▲8.5	▲1.5	▲2.1
Producers' share (fn1)	73.5	70.0	69.4	71.7	70.8	▼(4.1)	▼(3.6)	▼(0.6)	▼(0.9
Importers' share (fn1):						. ()	. ()	. ()	. (
China	***	17.6	18.0	17.7	9.8	***	A ***	▲0.4	▼(7.8
Mexico	***	***	***	***	***	* **	* **	▲***	↓ (7.0)
	***	***	***	***	***	***	***	* ***	A ***
Turkey	***	***	***	***	***	▲ ▲***	▲ ▲***	***	▲ ▲***
All other sources	***							_	
Nonsubject sources		12.5	12.6	10.6	19.4	A ***	▲ ***	▲0.1	▲8.8
All import sources	26.5	30.0	30.6	28.3	29.2	▲4.1	▲3.6	▲0.6	▲0.9
J.S. consumption value:									
Amount	804,868	873,766	937,367	445,072	481,814	▲16.5	▲8.6	▲7.3	▲8.3
Producers' share (fn1)	72.5	70.5	69.8	70.1	70.7	▼(2.7)	▼(2.0)	▼(0.7)	▲0.6
Importers' share (fn1):	. 2.0	1010	0010			. ()	. (2.0)	. (0)	
China	***	16.8	17.8	18.4	***	▲ ***	***	▲0.9	** **
	***	***	***	***	***	▲ ***	* **	▲***	×**
Mexico	***	***	***	***	***	×**	***	×**	**
Turkey	***	***	***	***	***				
All other sources	***				***	▲ ***	▲ ***	▼***	▲ ***
Nonsubject sources		12.7	12.5	11.5		▲ ***	▲ ***	▼(0.2)	* **
All import sources	27.5	29.5	30.2	29.9	29.3	▲2.7	▲2.0	▲0.7	▼(0.6
J.S. importers' U.S. shipments of imports									
China:									
Quantity	***	81,933	85,295	41,732	23,703	***	***	▲4.1	▼(43.2
Value	***	147,209	166,413	81,777	20,700	* **	***	▲13.0	▼ (+0.2
	***	,	,	,	***	×**	* ***		**
Unit value	***	\$1.80	\$1.95 ***	\$1.96 ***	***		***	▲8.6 ▼***	×**
Ending inventory quantity						▲ ***	A	• • • • •	•
Mexico:									
Quantity	***	***	***	***	***	A ***	▲ ***	▲ ***	▲ ***
Value	***	***	***	***	***	***	▲ ***	▲ ***	▲ ***
Unit value	***	***	***	***	***	▲ ***	▲ ***	▲ ***	▼***
Ending inventory quantity	***	***	***	***	***	***	A ***	▲ ***	A ***
Turkey:									
Quantity	***	***	***	***	***	***	***	***	**
Value	***	***	***	***	***	***	***	***	**
Unit value	***	***	***	***	***	* **	* **	*** ***	* **
	***	***	***	***	***	***	***	* **	* **
Ending inventory quantity									•
All other sources:	***	***	***	***	***				
Quantity		***	***	***	***	▲ ***	▲ ***	▲ ***	A ***
Value	***					***	▲ ***	▲ ***	▲ ***
Unit value	***	***	***	***	***	***	▼***	▲ ***	▼***
Ending inventory quantity	***	***	***	***	***	***	***	▼***	A ***
Nonsubject sources:									
Quantity	***	58,193	59,620	25,053	46.711	***	▲ ***	▲2.5	▲86.4
Value	***	110,575	116,722	51,227	***	***	***	▲5.6	** *
Unit value	***	\$1.90	\$1.96	\$2.04	***		* **	▲3.0	**
Ending inventory quantity	***	ψ1.50 ***	ψ1.50 ***	ψ2.0 4 ***	***	▲ ***	***	▼***	* **
						-	-	•	-
All import sources:	440.044	440 400	444.045	00 705	70 445	4 07 0	1 00 4		
Quantity	113,841	140,126	144,915	66,785	70,415	▲27.3	▲23.1	▲3.4	▲5.4
Value	221,589	257,783	283,135	133,004	141,215	▲27.8	▲16.3	▲9.8	▲6.2
Unit value	\$1.95	\$1.84	\$1.95	\$1.99	\$2.01	▲0.4	▼(5.5)	▲6.2	▲0.7
Ending inventory quantity	29,370	40,731	39,743	37,006	24,143	▲35.3	▲38.7	▼(2.4)	▼(34.8

Table continued on next page.

Table C-1--Continued

AWC: Summary data concerning the U.S. market, 2016-18, January to June 2018, and January to June 2019

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

_	Reported data					Period changes			
	Calendar year		January to June		Calendar year			Jan-Jun	
	2016	2017	2018	2018	2019	2016-18	2016-17	2017-18	2018-19
U.S. producers:									
Average capacity quantity	519,353	529,030	528,773	264,438	264,347	▲1.8	▲1.9	▼(0.0)	▼(0.0
Production quantity	346,777	366,732	372,979	194,814	190,570	▲7.6	▲5.8	▲1.7	₹(2.2
Capacity utilization (fn1)	66.8	69.3	70.5	73.7	72.1	▲3.8	▲2.6	▲1.2	▼(1.6
U.S. shipments:									
Quantity	316,423	326,692	329,031	169,233	170,613	▲4.0	▲3.2	▲0.7	▲0.8
Value	583,279	615,983	654,231	312,069	340,599	▲12.2	▲5.6	▲6.2	▲9.1
Unit value	\$1.84	\$1.89	\$1.99	\$1.84	\$2.00	▲7.9	▲2.3	▲5.5	▲8.3
Export shipments:									
Quantity	***	***	***	***	***	***	***	▲ ***	A ***
Value	***	***	***	***	***	***	▲ ***	***	▼***
Unit value	***	***	***	***	***	▼***	***	▼***	▼***
Ending inventory quantity	38,910	41,708	38,481	48,760	38,700	▼(1.1)	▲7.2	▼(7.7)	▼(20.6
Inventories/total shipments (fn1)	***	***	***	***	***	***	▲ ***	***	***
Production workers	1,709	1,734	1,720	1,739	1,747	▲0.6	▲ 1.5	▼(0.8)	▲0.5
Hours worked (1,000s)	4,358	4,305	4,306	2,250	2,235	▼(1.2)	▼(1.2)	▲0.0	▼(0.7
Wages paid (\$1,000)	90,886	93,360	98,013	50,444	51,402	▲7.8	▲2.7	▲5.0	▲1.9
Hourly wages (dollars per hour)	\$20.85	\$21.69	\$22.76	\$22.42	\$23.00	▲9.1	▲4.0	▲5.0	▲2.6
Productivity (pounds per hour)	79.6	85.2	86.6	86.6	85.3	▲8.9	▲7.1	▲1.7	▼(1.5
Unit labor costs	\$0.26	\$0.25	\$0.26	\$0.26	\$0.27	▲0.3	▼(2.9)	▲3.2	▲4.2
Net sales:									
Quantity	354,098	363,934	376,175	187,762	190,351	▲6.2	▲2.8	▲3.4	▲1.4
Value	654,473	695,642	741,072	354,418	377,108	▲13.2	▲6.3	▲6.5	▲6.4
Unit value	\$1.85	\$1.91	\$1.97	\$1.89	\$1.98	▲6.6	▲3.4	▲3.1	▲5.0
Cost of goods sold (COGS)	541,860	599,628	651,793	315,544	319,419	▲20.3	▲ 10.7	▲8.7	▲1.2
Gross profit or (loss) (fn2)	112,612	96,014	89,279	38,875	57,689	▼(20.7)	▼(14.7)	▼(7.0)	▲48.4
SG&A expenses	69,963	63,432	69,673	33,831	34,320	▼(0.4)	▼(9.3)	▲9.8	▲1.4
Operating income or (loss) (fn2)	42,649	32,582	19,606	5,043	23,369	▼(54.0)	▼(23.6)	▼(39.8)	▲363.4
Net income or (loss) (fn2)	34,871	28,049	8,910	(440)	19,484	▼(74.4)	▼(19.6)	▼(68.2)	A ***
Capital expenditures	***	***	***	***	***	▲ ***	***	▲ ***	▲ ***
Unit COGS	\$1.53	\$1.65	\$1.73	\$1.68	\$1.68	▲13.2	▲7.7	▲5.2	▼(0.1
Unit SG&A expenses	\$0.20	\$0.17	\$0.19	\$0.18	\$0.18	▼(6.3)	▼(11.8)	▲6.3	▲0.1
Unit operating income or (loss) (fn2)	\$0.12	\$0.09	\$0.05	\$0.03	\$0.12	▼(56.7)	▼(25.7)	▼(41.8)	▲357.1
Unit net income or (loss) (fn2)	\$0.10	\$0.08	\$0.02	\$0.00	\$0.10	▼(75.9)	▼(21.7)	▼(69.3)	A ***
COGS/sales (fn1)	82.8	86.2	88.0	89.0	84.7	▲5.2	▲3.4	▲1.8	▼(4.3
Operating income or (loss)/sales (fn1)	6.5	4.7	2.6	1.4	6.2	▼(3.9)	▼(1.8)	▼(2.0)	▲4.8
Net income or (loss)/sales (fn1)	5.3	4.0	1.2	(0.1)	5.2	▼(4.1)	▼(1.3)	▼(2.8)	▲5.3

Notes:

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 "---".

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.

Source: Compiled data submitted in response to Commission questionnaires.

APPENDIX D

PURCHASER QUESTIONNAIRE RESPONSES

As part of their response to the notice of institution, interested parties were asked to provide a list of three to five leading purchasers in the U.S. market for the domestic like product. A response was received from domestic interested parties, and it provided contact information for the following five firms as top purchasers of aluminum wire and cable: ***. Purchaser questionnaires were sent to these eight firms and one firm (***) submitted a response to the Commission's request for information.

 Have there been any significant changes in the supply and demand conditions for aluminum wire and cable that have occurred in the United States or in the market for aluminum wire and cable in China since December 23, 2019?

Purchaser	Yes / No	Changes that have occurred
***	***	***

2. Do you anticipate any significant changes in the supply and demand conditions for aluminum wire and cable in the United States or in the market for aluminum wire and cable in China within a reasonably foreseeable time?

Purchaser	Yes / No	Anticipated changes
***	***	***