

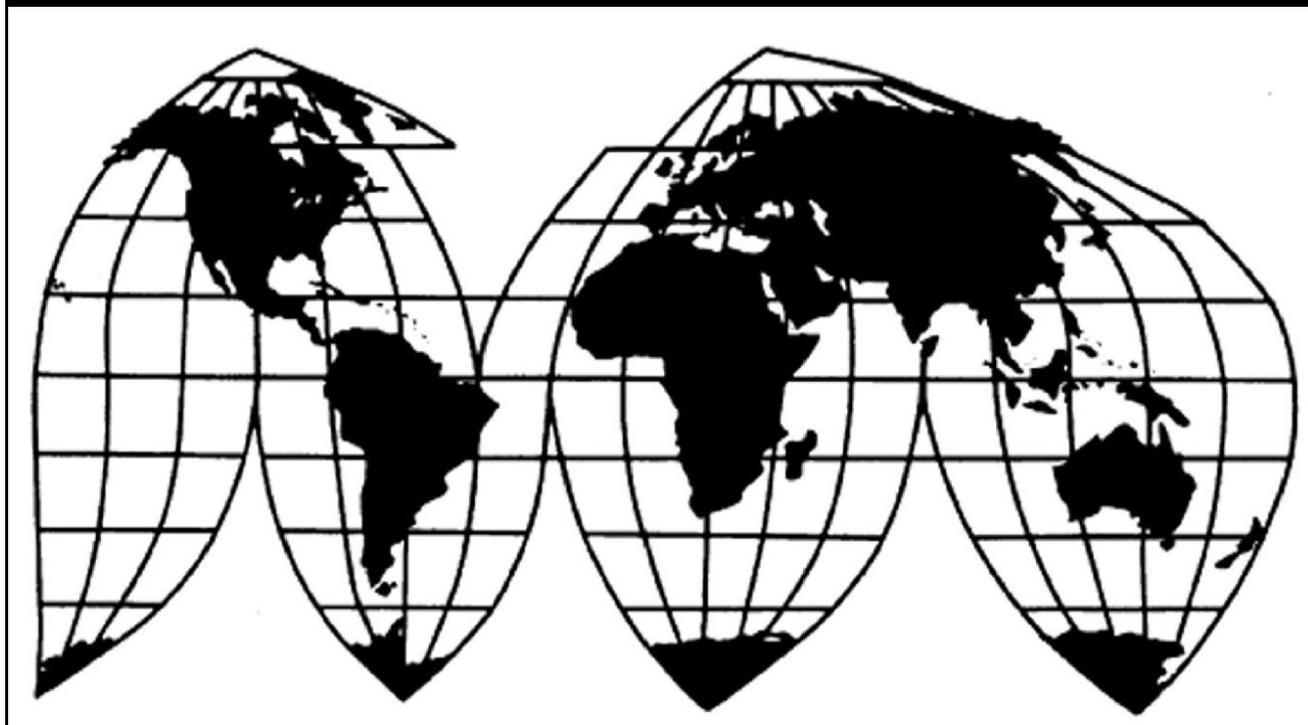
Carbon and Steel Alloy Threaded Rod from China, India, Taiwan, and Thailand

Investigation Nos. 701-TA-618-619 and 731-TA-1441-1444 (Review)

Publication 5637

June 2025

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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CONTENTS

	Page
Determinations	1
Views of the Commission	3
Information obtained in these reviews	1.1
Background	1.1
The original investigations	1.2
Previous and related investigations.....	1.3
Commerce’s five-year reviews.....	1.3
The product.....	1.4
Commerce’s scope	1.4
U.S. tariff treatment.....	1.5
Description and uses.....	1.6
Manufacturing process	1.7
The industry in the United States	1.9
U.S. producers.....	1.9
Recent developments	1.9
U.S. producers’ trade and financial data	1.10
Definitions of the domestic like product and domestic industry	1.11
U.S. importers	1.11
U.S. imports.....	1.12
Cumulation considerations	1.14
Apparent U.S. consumption and market shares.....	1.15
The industry in China	1.17
Producers in China	1.17
Recent developments	1.17
Exports	1.17
The industry in India	1.18
Producers in India	1.18
Recent developments	1.19
Exports	1.19
The industry in Taiwan.....	1.20
Producers in Taiwan.....	1.20
Recent developments	1.20
Exports	1.20
The industry in Thailand.....	1.21

Producers in Thailand	1.21
Recent developments	1.22
Exports	1.22
Third-country trade actions	1.22
The global market	1.23

Appendixes

A. <i>Federal Register</i> notices	A.1
B. Responses to the 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Note.—Information that would reveal confidential operations of individual firms may not be published.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-618-619 and 731-TA-1441-1444 (Review)

Carbon and Alloy Steel Threaded Rod from China, India, Taiwan, and Thailand

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 duty orders on carbon and alloy steel threaded rod from China and India and the antidumping duty orders on carbon and alloy steel threaded rod from China, India, Taiwan, and Thailand 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 87409) and determined on February 4, 2025, that it would conduct expedited reviews (90 FR 11623, March 10, 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 duty orders on carbon and alloy steel threaded rod (“threaded rod”) from China, India, Taiwan, and Thailand and the countervailing duty orders on threaded rod from China and India 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. On February 21, 2019, Vulcan Threaded Products Inc. (“Vulcan”) filed antidumping duty petitions on imports of threaded rod from China, India, Taiwan, and Thailand and countervailing duty petitions on imports of threaded rod from China and India.¹ Although Vulcan filed the petitions for these investigations on the same day, the investigation schedules became staggered when Commerce postponed the issuance of its preliminary determinations in its antidumping duty investigations of threaded rod from China, India, and Taiwan.² The investigation schedules became further staggered when Commerce aligned and postponed its final determinations in its antidumping and countervailing duty investigations of threaded rod from China and India.³

¹ *Carbon and Alloy Steel Threaded Rod from China, India, Taiwan, and Thailand; Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations*, 84 Fed. Reg. 6817 (Feb. 28, 2019). Although the petitions identified the petitioner as Vulcan Steel Products Inc., Vulcan later clarified that Vulcan Steel Products Inc. was its trade name and its registered name was Vulcan Threaded Products Inc. See *Clarification of Petitioner Name*, EDIS Doc. 847040 (Mar. 1, 2019).

² *Carbon and Alloy Steel Threaded Rod from India, Taiwan, and the People’s Republic of China: Postponement of Preliminary Determinations in the Less-Than-Fair-Value Investigations*, 84 Fed. Reg. 27764 (June 14, 2019).

³ *Carbon and Alloy Steel Threaded Rod from the People’s Republic of China: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination with Final Antidumping Duty Determination*, 84 Fed. Reg. 36578 (July 29, 2019); *Carbon and Alloy Steel Threaded Rod from India: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination with Final Antidumping Duty Determination*, 84 Fed. Reg. 36570 (July 29, 2019); *Alloy and Certain Carbon Steel Threaded Rod from the People’s Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination and Extension of Provisional Measures*, 84 Fed. Reg. 50379 (Sept. 25, 2019); *Carbon and Alloy Steel Threaded Rod from India: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures*, 84 Fed. Reg. 50376 (Sept. 25, 2019). After Vulcan revised the scope to exclude products covered by a preexisting antidumping duty order on carbon steel threaded rod from China, Commerce renamed the antidumping investigation on subject imports from (Continued...)

On December 5, 2019, the Commission determined that an industry in the United States was materially injured by reason of imports of threaded rod from Thailand sold at less than fair value (“LTFV”).⁴ On December 13, 2019, Commerce issued an antidumping duty order on subject imports of threaded rod from Thailand.⁵ On January 23, 2020, the Commission determined that an industry in the United States was materially injured by reason of imports of threaded rod from Taiwan sold at LTFV.⁶ On February 5, 2020, Commerce issued an antidumping duty order on subject imports of threaded rod from Taiwan.⁷ On April 3, 2020, the Commission determined that an industry in the United States was materially injured by reason of imports of threaded rod from China and India sold at LTFV and subsidized by the

China as “alloy and certain carbon steel threaded rod from the People’s Republic of China.” *Alloy and Certain Carbon Steel Threaded Rod from the People’s Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination and Extension of Provisional Measures*, 84 Fed. Reg. 50379 (Sept. 25, 2019).

⁴ *Carbon and Alloy Steel Threaded Rod from Thailand; Determination*, 84 Fed. Reg. 67476 (Dec. 10, 2019); see also *Carbon and Alloy Steel Threaded Rod from Thailand*, Inv. No. 731-TA-1444 (Final), USITC Pub. 4998 (Dec. 2019) (“*Original Investigations*”). The Commission also found that imports subject to Commerce’s affirmative critical circumstances determination were not likely to undermine seriously the remedial effect of the antidumping duty order on Thailand. *Original Investigations*, USITC Pub. 4998 at 41.

⁵ *Carbon and Alloy Steel Threaded Rod from Thailand: Antidumping Duty Order*, 84 Fed. Reg. 68108 (Dec. 13, 2019) (“*Thailand AD Order*”).

⁶ *Carbon and Alloy Steel Threaded Rod from Taiwan*, 85 Fed. Reg. 5237 (Jan. 29, 2020); see also *Carbon and Alloy Steel Threaded Rod from Taiwan*, Inv. No. 731-TA-1443 (Final), USITC Pub. 5013 (Jan. 2020). The record before the Commission for the Taiwan decision was the same as the record supporting the Thailand decision, except the Taiwan record included Commerce’s final antidumping duty determination for threaded rod from Taiwan. *Carbon and Alloy Steel Threaded Rod from Taiwan*, USITC Pub. 5013 at 4. No party submitted comments on Commerce’s final determination in the Taiwan investigation. *Id.* at 4 n.6. The Commission therefore adopted its findings and reasoning from the Thailand determination and concluded that the domestic industry was materially injured by subject imports from Taiwan sold in the United States at LTFV. *Id.* at 5–6.

⁷ *Carbon and Alloy Steel Threaded Rod from Taiwan: Antidumping Duty Order*, 85 Fed. Reg. 6511 (Feb. 5, 2020) (“*Taiwan AD Order*”).

governments of China and India.⁸ On April 9, 2020, Commerce issued antidumping and countervailing duty orders on subject imports of threaded rod from China and India.⁹

Current Reviews. On November 1, 2024, the Commission instituted these five-year reviews of the antidumping duty orders on threaded rod from China, India, Taiwan, and Thailand and the countervailing duty orders on threaded rod from China and India.¹⁰ The Commission received a joint response to the notice of institution from Vulcan and Bay Standard Manufacturing, Inc. (“Bay Standard”) (collectively, “Domestic Producers”), domestic producers of threaded rod.¹¹ The Commission did not receive a response from any respondent interested party.¹² On February 4, 2025, the Commission found the domestic interested party group response to be adequate and the respondent interested party group response to be inadequate.¹³ Finding no other circumstances that would warrant conducting full reviews, the Commission determined that it would conduct expedited reviews of the orders.¹⁴ Domestic

⁸ *Carbon and Alloy Steel Threaded Rod from China and India; Determinations*, 85 Fed. Reg. 19774 (Apr. 8, 2020); see also *Carbon and Alloy Steel Threaded Rod from China and India*, Inv. Nos. 701-TA-618–619 & 731-TA-1441–1442 (Final), USITC Pub. 5040 (Apr. 2020). Similar to the proceedings with respect to Taiwan, the record before the Commission for the China and India decisions was the same as the record supporting the Thailand decision, except the China and India record included Commerce’s final antidumping and countervailing duty determinations for those countries. *Carbon and Alloy Steel Threaded Rod from China and India*, USITC Pub. 5040 at 4. No party submitted comments on Commerce’s final determinations in the China and India investigations. *Id.* at 4 n.5. The Commission therefore adopted its findings and reasoning from the Thailand determination and concluded that the domestic industry was materially injured by subject imports from China and India sold in the United States at LTFV and subsidized by the governments of China and India, respectively. *Id.* at 4–5.

⁹ *Alloy and Certain Carbon Steel Threaded Rod from the People’s Republic of China: Antidumping Duty Order*, 85 Fed. Reg. 19929 (Apr. 9, 2020) (“China AD Order”); *Carbon and Alloy Steel Threaded Rod from India: Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Order*, 85 Fed. Reg. 19925 (Apr. 9, 2020) (“India AD Order”); *Carbon and Alloy Steel Threaded Rod from India and the People’s Republic of China: Countervailing Duty Orders*, 85 Fed. Reg. 19927 (Apr. 9, 2020) (“CVD Orders”).

¹⁰ *Carbon and Alloy Steel Threaded Rod from China, India, Taiwan, and Thailand; Institution of Five-Year Reviews*, 89 Fed. Reg. 87409 (Nov. 1, 2024).

¹¹ *Domestic Industry’s Substantive Response to Notice of Institution*, EDIS Doc. 838379 (Dec. 2, 2024) (“Domestic Response”); see also *Domestic Industry’s Response to Cure Letter*, EDIS Doc. 839320 (Dec. 16, 2024) (“Domestic Suppl. Resp.”).

¹² *Explanation of Commission Determinations on Adequacy*, EDIS Doc. 844016 (Feb. 21, 2025).

¹³ *Explanation of Commission Determinations on Adequacy*, EDIS Doc. 844016 (Feb. 21, 2025).

¹⁴ *Explanation of Commission Determinations on Adequacy*, EDIS Doc. 844016 (Feb. 21, 2025); accord *Carbon and Alloy Steel Threaded Rod from China, India, Taiwan, and Thailand; Scheduling of Expedited Five-Year Reviews*, 90 Fed. Reg. 11623 (Mar. 10, 2025).

Producers jointly submitted final comments pursuant to 19 C.F.R. § 207.62(d)(1) regarding the determinations that the Commission should reach.¹⁵

U.S. industry data in these reviews are based on information provided in the response to the notice of institution by Domestic Producers, which are estimated to have accounted for *** percent of U.S. production of threaded rod in 2023.¹⁶ U.S. import data are based on official Commerce statistics.¹⁷ Foreign industry data and related information are based on information from the original investigations, information submitted by Domestic Producers in their joint response to the notice of institution, and publicly available information.¹⁸ Additionally, one firm, ***, identified by Domestic Producers as a U.S. purchaser of threaded rod, responded to the Commission’s adequacy phase purchaser questionnaire.¹⁹

II. Domestic Like Product and Industry

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.”²⁰ 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.”²¹ The Commission’s practice in five-year reviews is to examine the domestic like product definition from the original

¹⁵ *Domestic Industry’s Final Comments*, EDIS Doc. 851905 (May 22, 2025) (“*Domestic Final Comments*”).

¹⁶ Confidential Report, INV-XX-012 (Jan. 23, 2025), *as modified by* Revision Memorandum INV-XX-042 (Apr. 10, 2025), *and* Revision Memorandum INV-XX-059 (May 7, 2025) (“CR”); Public Report, *Carbon and Alloy Steel Threaded Rod from China, India, Taiwan, and Thailand*, Inv. Nos. 701-TA-618–619 & 731-TA-1441–1444 (Review), USITC Pub. 5637 (June 2025) (“PR”) at 1.9–1.10. In light of the coverage rate, data on the domestic like product, including capacity, production, shipments, and share of apparent domestic consumption, may be understated, particularly in relation to comparable data from the original investigations. *See* CR/PR at Tables 1.4 & 1.6.

¹⁷ CR/PR at 1.11–1.16. Import data are compiled from official Commerce statistics under HTS statistical reporting numbers 7318.15.5051, 7318.15.5056, and 7318.15.5090. *Id.* at Table 1.5 note. Because these HTS statistical reporting numbers may include out-of-scope products, import data may be overstated, including with respect to volume and share of apparent U.S. consumption. *Id.*

¹⁸ CR/PR at 1.17–1.23. Note that Tables 1.8–1.12 may contain products outside of the scope of these reviews.

¹⁹ CR/PR at D.3.

²⁰ 19 U.S.C. § 1677(4)(A).

²¹ 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).

investigation and consider whether the record indicates any reason to revisit the prior findings.²²

As discussed further below, in these reviews, the scope for the antidumping duty order on threaded rod from China is different than the scope for the other orders. The scope for the antidumping duty order on threaded rod from China specifically excludes merchandise subject to a preexisting antidumping duty order on certain steel threaded rod from China. Additionally, both the antidumping and countervailing duty orders on threaded rod from China exclude certain wheel studs as a result of a changed circumstances review.

Commerce has defined the imported merchandise within the scope of the antidumping duty orders on threaded rod from India, Taiwan, and Thailand and the countervailing duty orders on threaded rod from China and India as follows:

The merchandise covered by the scope of the orders is carbon and alloy steel threaded rod. Steel threaded rod is certain threaded rod, bar, or studs, of carbon or alloy steel, having a solid, circular cross section of any diameter, in any straight length. Steel threaded rod is normally drawn, cold rolled, threaded, and straightened, or it may be hot-rolled. In addition, the steel threaded rod, bar, or studs subject to the order are non-headed and threaded along greater than 25 percent of their total actual length. A variety of finishes or coatings, such as plain oil finish as a temporary rust protectant, zinc coating (*i.e.*, galvanized, whether by electroplating or hot-dipping), paint, and other similar finishes and coatings, may be applied to the merchandise.

Steel threaded rod is normally produced to American Society for Testing and Materials (ASTM) specifications ASTM A36, ASTM A193 B7/B7m, ASTM A193 B16, ASTM A307, ASTM {A320} L7/L7M, ASTM A320 L43, ASTM A354 BC and BD, ASTM A449, ASTM F1554-36, ASTM F1554-55, ASTM F1554 Grade 105, American Society of Mechanical Engineers (ASME) specification ASME B18.31.3, and American Petroleum Institute (API) specification API 20E. All steel threaded rod meeting the physical description set forth above is covered by the scope of the order, whether or not produced according to a particular standard.

²² 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-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).

Subject merchandise includes material matching the above description that has been finished, assembled, or packaged in a third country, including by cutting, chamfering, coating, or painting the threaded rod, by attaching the threaded rod to, or packaging it with, another product, or any other finishing, assembly, or packaging operation that would not otherwise remove the merchandise from the scope of the order if performed in the country of manufacture of the threaded rod.

Carbon and alloy steel threaded rod are also included in the scope of the orders whether or not imported attached to, or in conjunction with, other parts and accessories such as nuts and washers. If carbon and alloy steel threaded rod are imported attached to, or in conjunction with, such non-subject merchandise, only the threaded rod is included in the scope.

Excluded from the scope of the orders are: (1) threaded rod, bar, or studs which are threaded only on one or both ends and the threading covers 25 percent or less of the total actual length; and (2) stainless steel threaded rod, defined as steel threaded rod containing, by weight, 1.2 percent or less of carbon and 10.5 percent or more of chromium, with {or} without other elements. Specifically excluded from the scope of the order is threaded rod that is imported as part of a package of hardware in conjunction with a ready-to-assemble piece of furniture.

Steel threaded rod is currently classifiable under subheadings 7318.15.5051, 7318.15.5056, and 7318.15.5090 of the Harmonized Tariff Schedule of the United States (HTSUS). Subject merchandise may also enter under subheading 7318.15.2095 and 7318.19.0000 of the HTSUS. The HTSUS subheadings are provided for convenience and U.S. Customs purposes only. The written description of the scope is dispositive.²³

²³ U.S. Dept. of Commerce, *Issues and Decision Memorandum for the Final Results of the Expedited Sunset Reviews on Carbon and Alloy Steel Threaded Rod Steel Threaded Rod {sic} from India, Taiwan, and Thailand*, EDIS Doc. 845570 at 2–3 (Mar. 4, 2025) (“*India, Taiwan, and Thailand AD I&D Memo*”); accord U.S. Dept. of Commerce, *Issues and Decision Memorandum for the Final Results of the Expedited Sunset Review of the Countervailing Duty Orders on Carbon and Alloy Steel Threaded Rod from India and the People’s Republic of China*, EDIS Doc. 845570 at 2–3 (Mar. 4, 2025) (“*CVD I&D Memo*”).

The scope of these orders under review is substantially the same as in the original investigations.²⁴ The only substantive difference is that the countervailing duty order on imports from China now excludes certain wheel studs from its scope as a result of a changed circumstances review.²⁵

Commerce has defined the imported merchandise within the scope of the antidumping duty order on threaded rod from China as follows:

The scope of the *Order* covers alloy and certain carbon steel threaded rod. Alloy and certain carbon steel threaded rod are certain threaded rod, bar, or studs, of carbon or alloy steel, having a solid, circular cross section of any diameter, in any straight length. Alloy and certain carbon steel threaded rod are normally drawn, cold rolled, threaded, and straightened, or it may be hot-rolled. In addition, the alloy and certain carbon steel threaded rod, bar, or studs subject to this order are non-headed and threaded along greater than 25 percent of their total actual length. A variety of finishes or coatings, such as plain oil finish as a temporary rust protectant, zinc coating (*i.e.*, galvanized, whether by electroplating or hot{-}dipping), paint, and other similar finishes and coatings, may be applied to the merchandise.

Alloy steel threaded rod is normally produced to American Society for Testing and Materials (ASTM) specifications A193 B7/B7m, A193 B16, A320 L7/L7m, A320 L43, A354 BC and BD, and F1554 Grade 105. Other specifications are Society of Automotive Engineers (SAE) specification 1429 grades 5 and 8, International Organization for Standardization (ISO) specification 898 class 8.8 and 10.9, and American Petroleum Institute (API) specification 20E. Certain carbon steel threaded rod is normally produced to ASTM specification A449. All steel threaded rod meeting the physical description set forth above is covered by

²⁴ Compare *India, Taiwan, and Thailand AD I&D Memo* at 2–3, and *CVD I&D Memo* at 2–3, with *India AD Order*, 85 Fed. Reg. at 19926–27, *Taiwan AD Order*, 85 Fed. Reg. at 6512, *Thailand AD Order*, 84 Fed. Reg. at 68109, and *CVD Orders*, 85 Fed. Reg. at 19928–29.

²⁵ See *CVD I&D Memo* at 7; *Antidumping Duty Order on Alloy and Certain Carbon Steel Threaded Rod and Countervailing Duty Order on Carbon and Alloy Steel Threaded Rod from the People’s Republic of China: Final Results of Changed Circumstances Reviews, Revocation of the Antidumping and Countervailing Duty Orders, in Part, and Rescission of Scope Inquiry*, 89 Fed. Reg. 91676 (Nov. 20, 2024) (partially revoking both the antidumping and countervailing duty orders on imports from China with respect to certain wheel studs). The definition of the excluded wheel studs is set out in the quotation below of the current scope of the antidumping duty order on alloy and certain carbon steel threaded rod from China.

the scope of this *Order*, whether or not produced according to a particular standard.

Subject merchandise includes material matching the above description that has been finished, assembled, or packaged in a third country, including by cutting, chamfering, coating, or painting the threaded rod, by attaching the threaded rod to, or packaging it with, another product, or any other finishing, assembly, or packaging operation that would not otherwise remove the merchandise from the scope of the *Order* if performed in the country of manufacture of the threaded rod. Alloy and certain carbon steel threaded rod are also included in the scope of this *Order* whether or not imported attached to, or in conjunction with, other parts and accessories such as nuts and washers. If carbon and alloy steel threaded rod are imported attached to, or in conjunction with, such nonsubject merchandise, only the threaded rod is included in the scope.

Excluded from the scope of the *Order* are: (1) threaded rod, bar, or studs which are threaded only on one or both ends and the threading covers 25 percent or less of the total actual length; and (2) stainless steel threaded rod, defined as steel threaded rod containing, by weight, 1.2 percent or less of carbon and 10.5 percent or more of chromium, with or without other elements.

Excluded from the scope of the *Order* on steel threaded rod from the People's Republic of China is any merchandise covered by the existing antidumping order on Certain Steel Threaded Rod from the People's Republic of China.

Specifically excluded from the scope of this investigation is threaded rod that is imported as part of a package of hardware in conjunction with a ready-to-assemble piece of furniture.

Wheel studs with the following characteristics are excluded from the scope of this *Order*:

- A wheel stud that has an M12 diameter and 1.5RH thread spacing threaded stud with a 6mm-wide inset hex head measuring 49mm long, part of the threaded length being divided by a 5mm unthreaded band which creates an 11.5mm threaded section for insertion that is also M12 diameter and 1.5RH thread spacing.

- A wheel stud that has an M12 diameter and 1.5RH thread spacing threaded stud with a 6mm-wide inset hex head measuring 49mm long, part of the threaded length being divided by a 5mm unthreaded band which creates an 11.5mm threaded section for insertion that is also M12 diameter and 1.5RH thread spacing.
- A wheel stud that has an M12 diameter and 1.5RH thread spacing threaded stud with a 6mm-wide inset hex head measuring 80mm, part of the threaded length being divided by a 5mm unthreaded band which creates an 11.5mm threaded section for insertion that is also M12 diameter and 1.5RH thread spacing.
- A wheel stud that has an M12 diameter and 1.5RH thread spacing threaded stud with a 6mm-wide inset hex head measuring 95mm long, part of the threaded length being divided by a 5mm unthreaded band which creates an 11.5mm threaded section for insertion that is also M12 diameter and 1.5RH thread spacing.
- A wheel stud that has an M14 diameter and 1.25RH thread spacing threaded stud with a 6mm-wide inset hex head measuring 75mm, part of the threaded length being divided by a 5mm unthreaded band which creates an 11.5mm threaded section for insertion that is also M14 diameter and 1.25RH thread spacing.
- A wheel stud that has an M14 diameter and 1.25RH thread spacing threaded stud with a 6mm-wide inset hex head measuring 92mm, part of the threaded length being divided by a 5mm unthreaded band which creates an 11.5mm threaded section for insertion that is also M14 diameter and 1.25RH thread spacing.
- A wheel stud that has an M12 diameter and 1.5RH thread spacing threaded stud with a 6mm-wide inset hex head measuring 49mm, part of the threaded length being divided by a 5mm unthreaded band which creates an 11.5mm threaded section for insertion that is M14 diameter and 1.5RH thread spacing.

- A wheel stud that has an M12 diameter and 1.5RH thread spacing threaded stud with a 6mm-wide inset hex head measuring 49mm, part of the threaded length being divided by a 5mm unthreaded band which creates an 11.5mm threaded section for insertion that is M14x1.25.
- A wheel stud that has an M12 diameter and 1.5RH thread spacing threaded stud with a 6mm-wide inset hex head measuring 44mm long, part of the threaded length being divided by a 5mm unthreaded band which creates an 11.5mm threaded section for insertion that is M14 diameter and 1.5 thread spacing.
- A wheel stud that has an M14 diameter and 1.5RH thread spacing threaded stud with a 6mm-wide inset hex head measuring 49mm long, part of the threaded length being divided by a 5mm unthreaded band which creates a 12.5mm threaded section for insertion that is also M14 diameter and 1.5RH thread spacing.
- A wheel stud that has an M14 diameter and 1.5RH thread spacing threaded stud with a 6mm-wide inset hex head measuring 64mm long, part of the threaded length being divided by a 5mm unthreaded band which creates and 21.5mm threaded section for insertion that is also M14 diameter and 1.5RH thread spacing.
- A wheel stud that has an M12 diameter and 1.5RH thread spacing threaded stud with a 6mm-wide inset hex head measuring 61mm long, part of the threaded length being divided by a 5mm unthreaded band which creates an 11.5mm threaded section for insertion.
- A wheel stud that has an M12 diameter and 1.5RH thread spacing threaded stud with a 6mm-wide inset hex head measuring 49mm long, part of the threaded length being divided by a 5mm unthreaded band which creates an 11.5mm threaded section for insertion that is M14 diameter and 1.5 thread spacing.

Alloy and certain carbon steel threaded rod are currently classifiable under subheadings 7318.15.5051, 7318.15.5056, and 7318.15.5090 of the Harmonized Tariff Schedule of the United States (HTSUS). Subject merchandise may also

enter under subheading 7318.15.2095 and 7318.19.0000 of the HTSUS. The HTSUS subheadings are provided for convenience and U.S. Customs purposes only. The written description of the scope is dispositive.²⁶

The scope of this order is substantially the same as in the original antidumping duty investigation of alloy and certain carbon steel threaded rod from China, except that the original order did not exclude the wheel studs described above.²⁷ It differs from the scopes of the other orders in including specifications SAE 1429 grades 5 and 8 and ISO 898 class 8.8 and 10.9, omitting specifications ASTM A36, ASTM A307, ASTM F1554-36, ASTM F1554-55, and ASME B18.31.3, and specifically excluding merchandise subject to the preexisting antidumping duty order on certain steel threaded rod from China.²⁸ Additionally, like the countervailing duty order on imports from China, this order excludes certain wheel studs from the scope as a result of a changed circumstances review.²⁹

Threaded rod is produced from carbon and alloy steel wire rod (in the form of coils), or from steel bar for applications that require a larger diameter.³⁰ Threaded rod can also be heat-treated either before or after it is threaded. Depending on the intended end use of the final product, threaded rod can also be coated or finished to impart corrosion resistance.³¹ Threaded rod is normally produced to comply with specifications published by the American

²⁶ U.S. Dept. of Commerce, *Issues and Decision Memorandum for the Final Results of the Expedited First Sunset Reviews of the Antidumping Duty Order on Alloy and Certain Carbon Steel Threaded Rod from the People's Republic of China*, EDIS Doc. 845570 at 2–4 (Feb. 21, 2025) (“*China AD I&D Memo*”).

²⁷ Compare *China AD I&D Memo* at 2–4, with *China AD Order*, 85 Fed. Reg. at 19930–31.

²⁸ Compare *China AD I&D Memo* at 2–4, with *India, Taiwan, and Thailand AD I&D Memo* at 2–3, and *CVD I&D Memo* at 2–3. In 2020, Commerce ordered the continuation of the preexisting antidumping duty order on certain steel threaded rod from China after its second sunset review. See *Certain Steel Threaded Rod from the People's Republic of China: Continuation of Antidumping Duty Order*, 85 Fed. Reg. 13625 (Mar. 9, 2020).

²⁹ See *Antidumping Duty Order on Alloy and Certain Carbon Steel Threaded Rod and Countervailing Duty Order on Carbon and Alloy Steel Threaded Rod from the People's Republic of China: Final Results of Changed Circumstances Reviews, Revocation of the Antidumping and Countervailing Duty Orders, in Part, and Rescission of Scope Inquiry*, 89 Fed. Reg. 91676 (Nov. 20, 2024). Unlike the antidumping duty order on imports from China, the countervailing duty order on imports from China does not mention the wheel stud exclusion in its scope. Compare *China AD I&D Memo* at 3–4, with *CVD I&D Memo* at 3. The issues and decisions memorandum accompanying the countervailing duty order does, however, mention the exclusion in its discussion of the history of the order. *CVD I&D Memo* at 7.

³⁰ CR/PR at 1.7.

³¹ CR/PR at 1.7–1.8. These coatings or finishes may include a plain oil finish, galvanization using either zinc plating or hot-dip galvanization, or other finishes such as paint or epoxy coatings. *Id.*

Society for Testing and Materials (“ASTM”), the American Society of Mechanical Engineers (“ASME”), and the American Petroleum Institute (“API”).³²

In the original investigations, the Commission found that both carbon and alloy threaded rod have the same physical appearance and generally the same uses, and largely share the same manufacturing facilities, production processes, and employees. It also found that domestically produced threaded rod generally is sold through a single channel of distribution (to distributors) and that steel and alloy threaded rod are interchangeable in many applications. The Commission observed that producers and customers perceive carbon and alloy threaded rod to be part of a single product category, and that threaded rod is available in a range of prices depending on size and other factors. Consequently, and in the absence of any contrary argument, the Commission defined a single domestic like product consisting of threaded rod, coextensive with Commerce’s scope of investigation.³³

In the current reviews, the record does not contain any new information suggesting that the pertinent characteristics and uses of threaded rod have changed since the original investigations so as to warrant revisiting the Commission’s domestic like product definition. Domestic Producers agree with the Commission’s definition of the domestic like product from the original investigations.³⁴ Consequently, we again define a single domestic like product consisting of threaded rod, 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.”³⁵ In defining the domestic industry, the Commission’s general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

We must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject

³² CR/PR at 1.6–1.7 & nn.21–29.

³³ *Original Investigations*, USITC Pub. 4998 at 8–9.

³⁴ *Domestic Response* at 20; *Domestic Final Comments* at 4.

³⁵ 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.

merchandise, or which are themselves importers.³⁶ Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.³⁷

In the original investigations, the Commission determined that eight of the ten known domestic producers of threaded rod qualified for possible exclusion under 19 U.S.C. § 1677(4)(B) because they either imported subject merchandise directly or had a parent-subsidiary relationship with an importer of subject merchandise during the period of investigation ("POI").³⁸ Upon examination, the Commission concluded that appropriate

³⁶ See *Torrington Co v. United States*, 790 F. Supp. 1161, 1168 (Ct. Int'l Trade 1992), *aff'd without opinion*, 991 F.2d 809 (Fed. Cir. 1993); *Sandvik AB v. United States*, 721 F. Supp. 1322, 1331–32 (Ct. Int'l Trade 1989), *aff'd mem.*, 904 F.2d 46 (Fed. Cir. 1990); *Empire Plow Co. v. United States*, 675 F. Supp. 1348, 1352 (Ct. Int'l Trade 1987).

³⁷ The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

- (1) the percentage of domestic production attributable to the importing producer;
- (2) the reason the U.S. producer has decided to import the product subject to investigation (whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market);
- (3) whether inclusion or exclusion of the related party will skew the data for the rest of the industry;
- (4) the ratio of import shipments to U.S. production for the imported product; and
- (5) whether the primary interest of the importing producer lies in domestic production or importation.

Changzhou Trina Solar Energy Co. v. USITC, 100 F. Supp. 3d 1314, 1326–31 (Ct. Int'l Trade 2015), *aff'd*, 879 F.3d 1377 (Fed. Cir. 2018); see also *Torrington Co.*, 790 F. Supp. at 1168.

³⁸ *Original Investigations*, USITC Pub. 4998 at 10. The POI included calendar years 2016 through 2018 and January to June ("interim") 2019.

During the original investigations, nine domestic producers responded to the Commission's U.S. producers' questionnaires, including: Acme Manufacturing Company ("Acme"); All Ohio Threaded Rod Company ("All Ohio"); All-Pro Threaded Products, Inc. ("All-Pro"); Alloy & Stainless Fasteners Inc. ("Alloy Stainless Fasteners"); B&G Manufacturing, Inc. ("B&G"); Bay Standard; Dan-Loc Group, LLC ("Dan-Loc"); Highland Threads, Inc. ("Highland"); and Vulcan. *Id.* at Table III-1. The eight producers that qualified for possible exclusion under the related parties provision included ***. *Confidential Views of the Commission (Final)*, EDIS Doc. 839527 at 11–17 (Dec. 5, 2019) ("*Confidential Views*"). *** did not report any subject imports during the period of investigation or any relationships with subject producers, exporters, or importers and thus did not qualify for potential exclusion under the related parties provision. *Original Investigations Confidential Report*, INV-RR-112, EDIS Doc. 839534 at Tables III-2 & III-9 (Nov. 4, 2019). The tenth known domestic producer, ***, did not respond to the Commission's questionnaire. *Id.* at III-1 n.2; *Original Investigations*, USITC Pub. 4998 at III-1 n.2.

circumstances existed for the exclusion of three of the producers, ***, because their principal interest was importation of subject merchandise rather than domestic production.³⁹ The Commission therefore defined the domestic industry as all U.S. producers of the domestic like product except ***.⁴⁰

Domestic Producers agree with the Commission's definition of the domestic industry from the original investigations.⁴¹ Domestic Producers report that Vulcan is not related to any subject importers and did not import subject merchandise during the period of review ("POR"), while Bay Standard ***.⁴² Domestic Producers observe that at least seven domestic producers imported threaded rod during the POR, and these producers were also listed as importers in the original investigations.⁴³ They argue that ***.⁴⁴ Domestic Producers do not otherwise address the related parties issue.

The record indicates that *** imported subject merchandise during the POR and therefore is subject to possible exclusion from the domestic industry under the related parties provision.⁴⁵ In the original investigations, the Commission found that ***'s primary interest appeared to be in domestic production and therefore did not exclude *** from the domestic industry under the related parties provision.⁴⁶ In these reviews, Domestic Producers estimate that *** was the *** of 11 domestic producers in 2023, accounting for *** percent of U.S. production.⁴⁷ *** imported *** pounds of subject merchandise from *** in 2023, accounting for *** percent of total subject imports from *** that year.⁴⁸ In comparison, *** produced ***

³⁹ *Original Investigations*, USITC Pub. 4998 at 11–15; *Confidential Views* at 11–17; *accord* CR/PR at 1.11 n.40.

⁴⁰ *Original Investigations*, USITC Pub. 4998 at 15; *Confidential Views* at 17.

⁴¹ *Domestic Response* at 20.

⁴² *Domestic Response* at 16; *Domestic Final Comments* at 5.

⁴³ The seven companies include All Ohio, All-Pro, Alloy Stainless Fasteners, B&G, Bay Standard, Dan-Loc, and Highland. *Domestic Response* at 16–17 (citing Exhibit 10); *Domestic Final Comments* at 5. ***, Domestic Producers do not specify whether these producers imported threaded rod from subject countries during the POR. *See id.*

⁴⁴ *Domestic Final Comments* at 5.

⁴⁵ *Domestic Suppl. Resp.*, Attachment 1; *accord* CR/PR at 1.11 & B.3.

⁴⁶ *Original Investigations*, USITC Pub. 4998 at 14; *Confidential Views* at 15.

⁴⁷ *Domestic Response*, Exhibit 2; *accord* CR/PR at 1.11. ***'s estimated share of production in 2023 was higher than its share at any point during the POI. *Compare id.*, with *Original Investigations Confidential Report* at Table III-4.

⁴⁸ *Domestic Suppl. Resp.*, Attachment 1; CR/PR at 1.11 & B.3. ***'s subject imports in 2023 were significantly lower than during the annual periods of the POI, and the firm did not report any subject imports from *** in 2023. *Compare Domestic Suppl. Resp.*, Attachment 1, and CR/PR at B.3, with *Original Investigations Confidential Report* at Table III-9. *** did not provide a reason for importing subject merchandise in 2023.

pounds of threaded rod in 2023.⁴⁹ The ratio of ***'s subject imports to its U.S. production was *** percent in 2023.⁵⁰ *** is *** continuation of the orders.⁵¹ We find that the firm's primary interest during the POR appears to be in domestic production, and that appropriate circumstances do not exist to exclude *** from the domestic industry pursuant to the related parties provision.

Aside from ***, there is no information on the record concerning any other domestic producer's possible imports of subject merchandise or domestic production of threaded rod because no firm other than Domestic Producers responded to the notice of institution. Consequently, we lack the information necessary to determine whether appropriate circumstances exist for the exclusion of any other producer from the domestic industry. By the same token, there are no data concerning any other producer's domestic production operations on the record that could be excluded from domestic industry data. Accordingly, consistent with our definition of the domestic like product, we define the domestic industry as all domestic producers of threaded rod.

III. Cumulation

A. Legal Standard

With respect to five-year reviews, section 752(a) of the Tariff Act provides as follows: the Commission may cumulatively assess the volume and effect of imports of the subject merchandise from all countries with respect to which reviews under section 1675(b) or (c) of this title were initiated on the same day, if such imports would be likely to compete with each other and with domestic like products in the United States market. The Commission shall not cumulatively assess the volume and effects of imports of the subject merchandise in a case in which it determines that such imports are likely to have no discernible adverse impact on the domestic industry.⁵²

⁴⁹ *Domestic Response*, Exhibit 1. Compared to the annual periods of the POI, ***'s production was substantially higher than its production in 2016 and 2017 and nearly equal to its production in 2018. Compare *id.*, with *Original Investigations Confidential Report* at Table III-9.

⁵⁰ CR/PR at 1.11.

⁵¹ CR/PR at B.3 n.1; *Domestic Final Comments* at 5.

⁵² 19 U.S.C. § 1675a(a)(7).

Cumulation therefore is discretionary in five-year reviews, unlike original investigations, which are governed by section 771(7)(G)(i) of the Tariff Act.⁵³ The Commission may exercise its discretion to cumulate, however, only if the reviews are initiated on the same day, the Commission determines that the subject imports are likely to compete with each other and the domestic like product in the U.S. market, and imports from each such subject country are not likely to have no discernible adverse impact on the domestic industry in the event of revocation. Our focus in five-year reviews is not only on present conditions of competition, but also on likely conditions of competition in the reasonably foreseeable future.

The statutory threshold for cumulation is satisfied in these five-year reviews because all reviews were initiated on the same day, November 1, 2024.⁵⁴

B. Prior Proceedings and Party Arguments

Original Investigations. In the original investigations, the Commission found a reasonable overlap of competition between and among the domestic like product and imports from each subject country and therefore cumulated subject imports for its material injury determinations.⁵⁵

Current Reviews. Domestic Producers argue that the Commission should exercise its discretion to cumulate subject imports from all four countries in these reviews.⁵⁶ They assert that there would likely be a significant influx of subject imports if the orders are revoked, which would likely have a significant adverse effect on domestic prices, and therefore subject imports would likely have a discernible adverse impact on the domestic industry.⁵⁷ Further, Domestic Producers contend that all subject imports are likely to compete with each other and the domestic like product if the orders are revoked.⁵⁸ They also maintain that the market

⁵³ 19 U.S.C. § 1677(7)(G)(i); *see also, e.g., Nucor Corp. v. United States*, 601 F.3d 1291, 1293 (Fed. Cir. 2010) (Commission may reasonably consider likely differing conditions of competition in deciding whether to cumulate subject imports in five-year reviews); *Allegheny Ludlum Corp. v. United States*, 475 F. Supp. 2d 1370, 1378 (Ct. Int'l Trade 2006) (recognizing the wide latitude the Commission has in selecting the types of factors it considers relevant in deciding whether to exercise discretion to cumulate subject imports in five-year reviews); *Nucor Corp. v. United States*, 569 F. Supp. 2d 1328, 1337–38 (Ct. Int'l Trade 2008).

⁵⁴ CR/PR at 1.1; *Carbon and Alloy Steel Threaded Rod from China, India, Taiwan, and Thailand; Institution of Five-Year Reviews*, 89 Fed. Reg. 87409 (Nov. 1, 2024).

⁵⁵ *Original Investigations*, USITC Pub. 4998 at 17–20.

⁵⁶ *Domestic Response* at 4–5; *Domestic Final Comments* at 6.

⁵⁷ *Domestic Response* at 4; *Domestic Final Comments* at 6.

⁵⁸ *Domestic Response* at 5; *Domestic Final Comments* at 6–7.

conditions underlying the Commission’s cumulation determination in the original investigations continue to prevail.⁵⁹

C. Likelihood of No Discernible Adverse Impact

The statute precludes cumulation if the Commission finds that subject imports from a country are likely to have no discernible adverse impact on the domestic industry.⁶⁰ Neither the statute nor the Uruguay Round Agreements Act (“URAA”) Statement of Administrative Action (“SAA”) provides specific guidance on what factors the Commission is to consider in determining that imports “are likely to have no discernible adverse impact” on the domestic industry.⁶¹ With respect to this provision, the Commission generally considers the likely volume of subject imports and the likely impact of those imports on the domestic industry within a reasonably foreseeable time if the orders are revoked. Our analysis for each of the subject countries takes into account, among other things, the nature of the product and the behavior of subject imports in the original investigations.

Based on the record in these reviews, we do not find that imports from any of the subject countries would likely have no discernible adverse impact on the domestic industry in the event of revocation, for the reasons detailed below.

*China.*⁶² In the original investigations, subject imports from China increased from 63.6 million pounds in 2016 to 94.0 million pounds in 2017 and 133.3 million pounds in 2018; the 62.1 million pounds of subject merchandise imported from China in interim 2019 were higher than the 52.2 million pounds in interim 2018.⁶³ The share of apparent U.S. consumption

⁵⁹ *Domestic Response* at 5; *Domestic Final Comments* at 7.

⁶⁰ 19 U.S.C. § 1675a(a)(7).

⁶¹ SAA, H.R. Rep. No. 103-316, vol. I at 887 (1994).

⁶² Where, as here, antidumping and countervailing duty orders for a given country cover different imports, the Commission must consider the imports subject to each order separately. See, e.g., *Stainless Steel Sheet and Strip from France, Germany, Italy, Japan, Korea, Mexico, Taiwan, and the United Kingdom*, Inv. Nos. 701-TA-381–382 and 731-TA-797–804 (Review), USITC Pub. 3788 at 13 (July 2005) (citing 19 U.S.C. § 1675a(a)(7)); *Stainless Steel Sheet and Strip from Germany, Italy, Japan, Korea, Mexico, and Taiwan*, Inv. Nos. 701-TA-382 and 731-TA-798–803 (Second Review), USITC Pub. 4244 at 13 (July 2011). In these reviews, the imports subject to the antidumping and countervailing duty orders on threaded rod from China differ, primarily due to the former’s scope excluding merchandise subject to a preexisting antidumping duty order on certain steel threaded bar from China. Compare *China AD I&D Memo* at 2–4, with *CVD I&D Memo* at 2–3. Accordingly, Commission staff calculated the volume of imports subject to the antidumping duty order under review by excluding imports of threaded rod from China under HTS number 7318.15.5056, which are subject to the preexisting antidumping duty order, although staff included those imports in the volume of imports subject to the countervailing duty order under review. CR/PR at Table 1.5 note.

⁶³ CR/PR at Tables 1.6 & C-2.

accounted for by subject imports from China increased from 17.9 percent in 2016 to 23.8 percent in 2017 and 30.0 percent in 2018; their share of 27.1 percent in interim 2019 was higher than their share of 25.5 percent in interim 2018.⁶⁴

In the POR, subject imports from China subject to the antidumping duty order decreased from 97.4 million pounds in 2019 to 33.3 million pounds in 2020 and 30.4 million pounds in 2021, and then increased to 45.2 million pounds in 2022 and 48.9 million pounds in 2023.⁶⁵ Subject imports from China subject to the countervailing duty order decreased from 98.2 million pounds in 2019 to 33.5 million pounds in 2020 and 30.8 million pounds in 2021, and then increased to 45.9 million pounds in 2022 and 49.7 million pounds in 2023.⁶⁶ Subject imports from China subject to the antidumping and countervailing duty orders accounted for *** and *** percent of apparent U.S. consumption in 2023, respectively.⁶⁷

Because no producer in China responded to the Commission's notice of institution, the record of these reviews contains limited information concerning the threaded rod industry in China.⁶⁸ Domestic Producers provided a list of 28 possible producers and exporters of threaded rod in China, and assert that Chinese producers of threaded rod likely have significant and increasing capacity and remain highly export-oriented, with a particular focus on the U.S. market.⁶⁹

Global Trade Atlas ("GTA") data indicate that China's exports of threaded screws and bolts under harmonized system ("HS") subheading 7318.15, a category including threaded rod and out-of-scope products, totaled 3.9 billion pounds in 2023.⁷⁰ The available data also indicate that the United States was the top destination market for exports of such merchandise from China throughout the POR.⁷¹

In the original investigations, subject imports from China undersold the domestic like product in *** of *** quarterly comparisons, with an average margin of underselling of *** percent.⁷² No product-specific pricing data concerning subject imports from China were obtained in these expedited reviews.

⁶⁴ *Original Investigations*, USITC Pub. 4998 at Table IV-9; *accord* CR/PR at Tables 1.6 & C-2.

⁶⁵ CR/PR at Table 1.5.

⁶⁶ CR/PR at Table 1.5; *accord Domestic Response*, Exhibit 3.

⁶⁷ CR/PR at Tables 1.5–1.6.

⁶⁸ CR/PR at 1.17. Similarly, in the original investigations, no respondent from China participated in the proceedings, and the Commission did not receive any questionnaire responses from producers or exporters of subject merchandise in China. *Original Investigations*, USITC Pub. 4998 at 3, 5.

⁶⁹ *Domestic Response* at 8–10, Exhibit 5; *accord* CR/PR at Table 1.7.

⁷⁰ CR/PR at Table 1.8.

⁷¹ CR/PR at Table 1.8.

⁷² *Original Investigations Confidential Report* at Table V-10.

In light of the foregoing, including the significant and increasing volume of subject imports from China in the original investigations, the continued presence of imports from China subject to each order in the U.S. market while under the disciplining effect of the orders, the available information about the threaded rod industry in China, and the underselling by subject imports from China during the original investigations, we do not find that imports from China subject to the antidumping duty order and imports from China subject to the countervailing duty order would likely have no discernible adverse impact on the domestic industry if the pertinent orders were revoked.

*India.*⁷³ In the original investigations, subject imports from India increased from 61.1 million pounds in 2016 to 70.4 million pounds in 2017 and 74.3 million pounds in 2018; the 47.6 million pounds of subject merchandise imported from India in interim 2019 were higher than the 35.4 million pounds in interim 2018.⁷⁴ The share of apparent U.S. consumption accounted for by subject imports from India increased from 17.2 percent in 2016 to 17.8 percent in 2017, and then decreased to 16.7 percent in 2018; their share of 20.8 percent in interim 2019 was higher than their share of 17.3 percent in interim 2018.⁷⁵

In the POR, subject imports from India decreased from 76.6 million pounds in 2019 to 68.2 million pounds in 2020, then increased to 82.7 million pounds in 2021 and 89.4 million pounds in 2022, and then decreased to 87.0 million pounds in 2023.⁷⁶ Subject imports from India accounted for *** percent of apparent U.S. consumption in 2023.⁷⁷

The record of these reviews contains limited information concerning the threaded rod industry in India because no producer in India responded to the Commission's notice of institution.⁷⁸ In the original investigations, responding Indian producers reported that in 2018, they had capacity of *** pounds, production of *** pounds, and a capacity utilization rate of *** percent, yielding excess capacity of *** pounds, and exported *** percent of their total shipments.⁷⁹ In these reviews, Domestic Producers provided a list of nine possible producers

⁷³ The antidumping and countervailing duty orders on threaded rod from India cover the same imports. *Compare India, Taiwan, and Thailand AD I&D Memo* at 2–3, with *CVD I&D Memo* at 2–3. Therefore, our analysis of whether imports of subject threaded rod from India are likely to have no discernible adverse impact applies equally to imports subject to the antidumping duty order and imports subject to the countervailing duty order.

⁷⁴ CR/PR at Tables 1.6 & C-2.

⁷⁵ *Original Investigations*, USITC Pub. 4998 at Table IV-9; *accord* CR/PR at Tables 1.6 & C-2.

⁷⁶ CR/PR at Table 1.5; *accord Domestic Response*, Exhibit 3.

⁷⁷ CR/PR at Table 1.6.

⁷⁸ CR/PR at 1.18.

⁷⁹ *Original Investigations Confidential Report* at Table VII-4. In the original investigations, the Commission received responses from four Indian producers and exporters accounting for 41.8 percent of U.S. imports of threaded rod from India in 2018. CR/PR at 1.18.

and exporters of threaded rod in India, and assert that Indian producers of threaded rod likely have significant capacity and remain highly export-oriented, with a particular focus on the U.S. market.⁸⁰

GTA data indicate that India's exports of threaded screws and bolts under HS subheading 7318.15, a category including threaded rod and out-of-scope products, totaled 353.2 million pounds in 2023.⁸¹ The available data also indicate that the United States was a top destination market for exports of such merchandise from India throughout the POR.⁸²

In the original investigations, subject imports from India undersold the domestic like product in *** of *** quarterly comparisons, with an average margin of underselling of *** percent.⁸³ No product-specific pricing data concerning subject imports from India were obtained in these expedited reviews.

In light of the foregoing, including the significant and increasing volume of subject imports from India in the original investigations, the continued presence of subject imports from India in the U.S. market while under the disciplining effect of the orders, the available information about the threaded rod industry in India, and the underselling by subject imports from India during the original investigations, we do not find that subject imports from India would likely have no discernible adverse impact on the domestic industry if the pertinent orders were revoked.

Taiwan. In the original investigations, subject imports from Taiwan decreased from 42.2 million pounds in 2016 to 38.2 million pounds in 2017, and then increased to 44.9 million pounds in 2018; the 23.8 million pounds of subject merchandise imported from Taiwan in interim 2019 were higher than the 20.6 million pounds in interim 2018.⁸⁴ The share of apparent U.S. consumption accounted for by subject imports from Taiwan decreased from 11.9 percent in 2016 to 9.7 percent in 2017, and then increased to 10.1 percent in 2018; their share of 10.4 percent in interim 2019 was slightly higher than their share of 10.1 percent in interim 2018.⁸⁵

In the POR, subject imports from Taiwan decreased from 37.2 million pounds in 2019 to 15.5 million pounds in 2020, then increased to 17.4 million pounds in 2021 and 18.4 million

⁸⁰ *Domestic Response* at 10–11, Exhibit 5; *accord* CR/PR at 1.18.

⁸¹ CR/PR at Table 1.9.

⁸² CR/PR at Table 1.9.

⁸³ *Original Investigations Confidential Report* at Table V-10.

⁸⁴ CR/PR at Tables 1.6 & C-2.

⁸⁵ *Original Investigations*, USITC Pub. 4998 at Table IV-9; *accord* CR/PR at Tables 1.6 & C-2.

pounds in 2022, and then decreased to 12.4 million pounds in 2023.⁸⁶ Subject imports from Taiwan accounted for *** percent of apparent U.S. consumption in 2023.⁸⁷

The record of these reviews contains limited information concerning the threaded rod industry in Taiwan because no producer in Taiwan responded to the Commission's notice of institution.⁸⁸ In the original investigations, the responding producer from Taiwan reported that in 2018, it had capacity of *** pounds, production of *** pounds, and a capacity utilization rate of *** percent, yielding *** excess capacity, and exported *** percent of its total shipments.⁸⁹ In these reviews, Domestic Producers provided a list of 10 possible producers and exporters of threaded rod in Taiwan, and assert that producers of threaded rod in Taiwan are highly export-oriented, with a particular focus on the U.S. market.⁹⁰

GTA data indicate that Taiwan's exports of threaded screws and bolts under HS subheading 7318.15, a category including threaded rod and out-of-scope products, totaled 1.4 billion pounds in 2023.⁹¹ The available data also indicate that the United States was the top destination market for exports of such merchandise from Taiwan throughout the POR.⁹²

In the original investigations, subject imports from Taiwan undersold the domestic like product in *** of *** quarterly comparisons, with an average margin of underselling of *** percent.⁹³ No product-specific pricing data concerning subject imports from Taiwan were obtained in these expedited reviews.

In light of the foregoing, including the significant volume of subject imports from Taiwan in the original investigations, the continued presence of subject imports from Taiwan in the U.S. market while under the disciplining effect of the order, the available information about the threaded rod industry in Taiwan, and the underselling by subject imports from Taiwan during the original investigations, we do not find that subject imports from Taiwan would likely have no discernible adverse impact on the domestic industry if the pertinent order were revoked.

Thailand. In the original investigations, subject imports from Thailand decreased from 12.1 million pounds in 2016 to 10.4 million pounds in 2017, and then increased to 11.8 million

⁸⁶ CR/PR at Table 1.5; *accord Domestic Response*, Exhibit 3.

⁸⁷ CR/PR at Table 1.6.

⁸⁸ CR/PR at 1.20.

⁸⁹ *Original Investigations Confidential Report* at Table VII-8. In the original investigations, the Commission received a response from one producer and exporter in Taiwan accounting for *** percent of threaded rod production in Taiwan and *** percent of U.S. imports of threaded rod from Taiwan in 2018. CR/PR at 1.20.

⁹⁰ *Domestic Response* at 11–12, Exhibit 5; *accord* CR/PR at 1.20.

⁹¹ CR/PR at Table 1.10.

⁹² CR/PR at Table 1.10.

⁹³ *Original Investigations Confidential Report* at Table V-10.

pounds in 2018; the 5.7 million pounds of subject merchandise imported from Thailand in interim 2019 were higher than the 5.6 million pounds in interim 2018.⁹⁴ The share of apparent U.S. consumption accounted for by subject imports from Thailand decreased from 3.4 percent in 2016 to 2.6 percent in 2017, and then increased to 2.7 percent in 2018; their share of 2.5 percent in interim 2019 was slightly lower than their share of 2.8 percent in interim 2018.⁹⁵

In the POR, subject imports from Thailand decreased from 6.4 million pounds in 2019 to 50,000 pounds in 2020; 40,000 pounds in 2021; 24,000 pounds in 2022; and 21,000 pounds in 2023.⁹⁶ Subject imports from Thailand accounted for *** percent of apparent U.S. consumption in 2023.⁹⁷

The record of these reviews contains limited information concerning the threaded rod industry in Thailand because no producer in Thailand responded to the Commission's notice of institution.⁹⁸ Domestic Producers named one possible producer and exporter of threaded rod in Thailand and noted the producer's focus on exports.⁹⁹

GTA data indicate that Thailand's exports of threaded screws and bolts under HS subheading 7318.15, a category including threaded rod and out-of-scope products, totaled 251.1 million pounds in 2023.¹⁰⁰ The available data also indicate that the United States was the second-largest destination market for exports of such merchandise from Thailand throughout the POR.¹⁰¹

In the original investigations, subject imports from Thailand undersold the domestic like product in *** of *** quarterly comparisons, with an average margin of underselling of *** percent.¹⁰² No product-specific pricing data concerning subject imports from Thailand were obtained in these expedited reviews.

In light of the foregoing, including the significant volume of subject imports from Thailand in the original investigations, the continued presence of subject imports from Thailand in the U.S. market while under the disciplining effect of the order, the available information about the threaded rod industry in Thailand, and the underselling by subject imports from Thailand during the original investigations, we do not find that subject imports from Thailand

⁹⁴ CR/PR at Tables 1.6 & C-2.

⁹⁵ *Original Investigations*, USITC Pub. 4998 at Table IV-9; *accord* CR/PR at Tables 1.6 & C-2.

⁹⁶ CR/PR at Table 1.5; *accord Domestic Response*, Exhibit 3.

⁹⁷ CR/PR at Table 1.6.

⁹⁸ CR/PR at 1.21.

⁹⁹ *Domestic Response* at 12, Exhibit 5; *accord* CR/PR at 1.21.

¹⁰⁰ CR/PR at Table 1.11.

¹⁰¹ CR/PR at Table 1.11.

¹⁰² *Original Investigations Confidential Report* at Table V-10.

would likely have no discernible adverse impact on the domestic industry if the pertinent order were revoked.

D. Likelihood of a Reasonable Overlap of Competition

The Commission generally has considered four factors to provide a framework for determining whether subject imports compete with each other and with the domestic like product.¹⁰³ Only a “reasonable overlap” of competition is required.¹⁰⁴ In five-year reviews, the relevant inquiry is whether there likely would be competition even if none currently exists because the subject imports are absent from the U.S. market.¹⁰⁵

Fungibility. In the original investigations, most U.S. producers, importers, and purchasers reported that imports from each subject country were always or frequently interchangeable with each other and the domestic like product, despite imports from different countries potentially differing in certain physical characteristics.¹⁰⁶ The Commission observed that threaded rod regardless of source is produced in accordance with ASTM, ASME, or API specifications.¹⁰⁷ The Commission noted that domestically produced threaded rod and subject imports from each source were considered generally comparable by majorities or pluralities of

¹⁰³ The four factors generally considered by the Commission in assessing whether imports compete with each other and with the domestic like product are as follows: (1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality-related questions; (2) the presence of sales or offers to sell in the same geographical markets of imports from different countries and the domestic like product; (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and (4) whether subject imports are simultaneously present in the market with one another and the domestic like product. *See, e.g., Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int’l Trade 1989).

¹⁰⁴ *See Mukand Ltd. v. United States*, 937 F. Supp. 910, 916 (Ct. Int’l Trade 1996); *Wieland Werke*, 718 F. Supp. at 52 (“Completely overlapping markets are not required.”); *United States Steel Group v. United States*, 873 F. Supp. 673, 685 (Ct. Int’l Trade 1994), *aff’d*, 96 F.3d 1352 (Fed. Cir. 1996). We note, however, that there have been investigations where the Commission has found an insufficient overlap in competition and has declined to cumulate subject imports. *See, e.g., Live Cattle from Canada and Mexico*, Inv. Nos. 701-TA-386 and 731-TA-812–813 (Preliminary), USITC Pub. 3155 at 15 (Feb. 1999), *aff’d sub nom. Ranchers-Cattlemen Action Legal Foundation v. United States*, 74 F. Supp. 2d 1353 (Ct. Int’l Trade 1999); *Static Random Access Memory Semiconductors from the Republic of Korea and Taiwan*, Inv. Nos. 731-TA-761–762 (Final), USITC Pub. 3098 at 13–15 (Apr. 1998).

¹⁰⁵ *See generally Cheflin Corp. v. United States*, 219 F. Supp. 2d 1313, 1314 (Ct. Int’l Trade 2002).

¹⁰⁶ *Original Investigations*, USITC Pub. 4998 at 18 & Table II-12.

¹⁰⁷ *Original Investigations*, USITC Pub. 4998 at 18.

purchasers across a broad range of factors considered in their purchasing decisions.¹⁰⁸ Thus, the Commission found the domestic like product and threaded rod from each subject country to be fungible.¹⁰⁹

In these reviews, there is no new information in the record to indicate that the degree of fungibility between and among subject imports from China, India, Taiwan, and Thailand and the domestic like product has changed since the original investigations.

Channels of Distribution. In the original investigations, the Commission found that domestic producers sold threaded rod *** to distributors, and importers of threaded rod from each subject country sold predominantly to distributors.¹¹⁰ In these reviews, there is no new information on the record to indicate that the channels of distribution used by domestic producers and importers of threaded rod from each subject country have changed since the original investigations.

Geographic Overlap. In the original investigations, the Commission found that the domestic like product and threaded rod imported from each of the subject countries were sold throughout the contiguous United States.¹¹¹ In these reviews, subject imports from China, India, and Taiwan entered through the northern, southern, eastern, and western borders of entry in all years from 2019 through 2023.¹¹² Subject imports from Thailand entered through all four borders in 2019 and 2020, all but the western border in 2021, only the southern border in 2022, and only the eastern and southern borders in 2023.¹¹³ Thus, the record indicates that subject imports from each country continued to geographically overlap during the POR.

Simultaneous Presence. In the original investigations, the Commission found that the domestic like product and subject imports from all four subject countries were present in the

¹⁰⁸ *Original Investigations*, USITC Pub. 4998 at 18. A majority of purchasers reported, however, that domestically produced threaded rod was inferior to imports from each of the subject countries with respect to price and superior to subject imports from India with respect to delivery time. *Id.* at 18 n.89 & Table II-11. A majority also reported that subject imports from India were superior to those from Thailand with respect to price. *Id.*

¹⁰⁹ *Original Investigations*, USITC Pub. 4998 at 19.

¹¹⁰ *Original Investigations*, USITC Pub. 4998 at 19; *Confidential Views* at 20. Specifically, in 2018, domestic producers sold *** percent of their U.S. shipments of threaded rod to distributors, and importers sold *** percent of their U.S. shipments of subject imports from China, *** percent of their U.S. shipments of subject imports from India, *** percent of their U.S. shipments of subject imports from Taiwan, and *** percent of their U.S. shipments of subject imports from Thailand to distributors. *Confidential Views* at 20.

¹¹¹ *Original Investigations*, USITC Pub. 4998 at 19.

¹¹² CR/PR at 1.14.

¹¹³ CR/PR at 1.14.

U.S. market during each quarter of the POI.¹¹⁴ In these reviews, subject imports from China, India, and Taiwan were present in the U.S. market during every month from 2019 to 2023, and subject imports from Thailand were present during 31 of the 60 months from 2019 to 2023.¹¹⁵

Conclusion. The record in these expedited reviews indicates that subject imports from China, India, Taiwan, and Thailand remain fungible with each other and the domestic like product. The record also indicates that subject imports from each country overlapped with each other and the domestic like product in terms of channels of distribution and geographic markets and were simultaneously present in the U.S. market. In light of these considerations, and in the absence of any contrary argument, we find that there would likely be a reasonable overlap of competition between and among subject imports of threaded rod from China, India, Taiwan, and Thailand and the domestic like product if the orders were revoked.

E. Likely Conditions of Competition

In determining whether to exercise our discretion to cumulate the subject imports, we assess whether subject imports from the subject countries are likely to compete under similar conditions in the U.S. market in the event of revocation of the orders under review.

The record in these reviews contains limited current information about the threaded rod industries in China, India, Taiwan, and Thailand and the U.S. market for threaded rod. There is no information in the record to suggest that subject imports from China, India, Taiwan, and Thailand are likely to compete under different conditions of competition if the orders were revoked. Based on the information available, and in the absence of any argument to the contrary, we find that imports from China, India, Taiwan, and Thailand are likely to compete under similar conditions of competition in the event of revocation of the orders.

F. Conclusion

In sum, we determine that subject imports of threaded rod from China, India, Taiwan, and Thailand, considered individually, are not likely to have no discernible adverse impact on the domestic industry if the corresponding orders were revoked. We also find a likely reasonable overlap of competition between and among subject imports from China, India, Taiwan, and Thailand and the domestic like product if the orders were revoked. Finally, we find that imports from each subject country would be likely to compete under similar conditions of competition if the orders were revoked. We therefore exercise our discretion to cumulate subject imports of threaded rod from China, India, Taiwan, and Thailand for purposes of our analysis in these reviews.

¹¹⁴ *Original Investigations*, USITC Pub. 4998 at 19.

¹¹⁵ CR/PR at 1.14.

IV. 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.”¹¹⁶ 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.”¹¹⁷ Thus, the likelihood standard is prospective in nature.¹¹⁸ 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.¹¹⁹

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

¹¹⁶ 19 U.S.C. § 1675a(a).

¹¹⁷ 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.

¹¹⁸ 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.

¹¹⁹ 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’”).

time.”¹²⁰ 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.”¹²¹

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 orders are revoked or the suspended investigation is terminated.”¹²² 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).¹²³ 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.¹²⁴

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.¹²⁵ 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

¹²⁰ 19 U.S.C. § 1675a(a)(5).

¹²¹ 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.*

¹²² 19 U.S.C. § 1675a(a)(1).

¹²³ 19 U.S.C. § 1675a(a)(1). Commerce has not made any duty absorption findings since the imposition of the antidumping duty orders. *See China AD I&D Memo at 7; India, Taiwan, and Thailand AD I&D Memo at 4–5.*

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

¹²⁵ 19 U.S.C. § 1675a(a)(2).

country, which can be used to produce the subject merchandise, are currently being used to produce other products.¹²⁶

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.¹²⁷

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.¹²⁸ 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 orders under review and whether the industry is vulnerable to material injury upon revocation.¹²⁹

No respondent interested party participated in these expedited reviews. The record, therefore, contains limited new information regarding the threaded rod industries in China, India, Taiwan, and Thailand. There also is limited information on the threaded rod market in the United States during the POR. Accordingly, for our determinations, we rely as appropriate

¹²⁶ 19 U.S.C. § 1675a(a)(2)(A-D).

¹²⁷ 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.

¹²⁸ 19 U.S.C. § 1675a(a)(4).

¹²⁹ 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.

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.”¹³⁰ The following conditions of competition inform our determinations.

1. Demand Conditions

Original Investigations. The Commission observed that demand for threaded rod depends on the demand for end use products in building construction, particularly nonresidential and industrial construction, and oil and gas extraction.¹³¹ The Commission noted that products incorporating threaded rod included duct hangers, bracing brackets, structural tie downs for sprinkler systems, conduits, electrical wiring, lights, and HVAC units, as well as joint restraint systems for underground piping, concrete anchors, and general framing and anchoring.¹³² Apparent U.S. consumption increased from 354.7 million pounds in 2016 to 394.8 million pounds in 2017 and 444.5 million pounds in 2018; apparent U.S. consumption of 228.8 million pounds in interim 2019 was higher than the 204.3 million pounds in interim 2018.¹³³

Current Reviews. There is no new information indicating that the factors influencing demand have changed since the original investigations. The record indicates that demand for threaded rod continues to derive from end use products used in building construction and oil and gas extraction.¹³⁴ Domestic Producers contend that demand for threaded rod is “intertwined with the construction and manufacturing sectors” and that the COVID-19 pandemic, supply chain issues, construction trends, and interest rate hikes disrupted demand during the POR.¹³⁵ They also claim that overall demand for threaded rod decreased during the POR while total imports are on the rise, placing the domestic industry in a vulnerable condition.¹³⁶ Responding purchaser *** reported that ***.¹³⁷

¹³⁰ 19 U.S.C. § 1675a(a)(4).

¹³¹ *Original Investigations*, USITC Pub. 4998 at 24.

¹³² *Original Investigations*, USITC Pub. 4998 at 24.

¹³³ *Original Investigations*, USITC Pub. 4998 at 24–25; *accord* CR/PR at Tables 1.6 & C-2.

¹³⁴ CR/PR at 1.6.

¹³⁵ *Domestic Response* at 19.

¹³⁶ *Domestic Response* at 19–20.

¹³⁷ CR/PR at D.3. Throughout its questionnaire response, ***.

In 2023, apparent U.S. consumption of threaded rod was *** pounds, which was *** percent less than the apparent U.S. consumption of 444.5 million pounds in 2018, the last full year of the POI, although lower coverage of domestic producers' U.S. shipments in these reviews would affect these trends.¹³⁸

2. Supply Conditions

Original Investigations. The domestic industry was the second-largest supplier of threaded rod to the U.S. market during the POI.¹³⁹ Its share of apparent U.S. consumption decreased from *** percent in 2016 to *** percent in 2017 and *** percent in 2018.¹⁴⁰ The domestic industry's capacity decreased from *** pounds in 2016 to *** pounds in 2017 and *** pounds in 2018.¹⁴¹ The domestic industry's capacity utilization increased from *** percent in 2016 to *** percent in 2017 and *** percent in 2018.¹⁴²

Cumulated subject imports were the largest supplier of threaded rod to the U.S. market during the POI.¹⁴³ Their share of apparent U.S. consumption increased from 50.5 percent in 2016 to 54.0 percent in 2017 and 59.5 percent in 2018.¹⁴⁴

Nonsubject imports were the smallest source of supply of threaded rod to the U.S. market during the POI.¹⁴⁵ Their share of apparent U.S. consumption decreased from 12.0 percent in 2016 to 9.8 percent in 2017 and 8.4 percent in 2018.¹⁴⁶

Current Reviews. The domestic industry was the third-largest source of threaded rod in the U.S. market in 2023, accounting for *** percent of apparent U.S. consumption.¹⁴⁷ Domestic

¹³⁸ CR/PR at Tables 1.6 & C-2; *Original Investigations*, USITC Pub. 4998 at 24–25. We note that fewer U.S. producers responded to the notice of institution in these reviews than responded to the Commission's U.S. producer questionnaires in the original investigations.

¹³⁹ *Original Investigations*, USITC Pub. 4998 at 25.

¹⁴⁰ CR/PR at Tables 1.6 & C-2. The domestic industry's share of the U.S. market was *** percent in interim 2019, which was lower than its *** percent share in interim 2018. *Id.* at Table C-2.

¹⁴¹ CR/PR at Tables 1.4 & C-2. The domestic industry's capacity of *** pounds in interim 2019 was *** higher than its capacity of *** pounds in interim 2018. *Id.* at Table C-2.

¹⁴² CR/PR at Tables 1.4 & C-2. The domestic industry's capacity utilization of *** percent in interim 2019 was lower than its capacity utilization of *** percent in interim 2018. *Id.* at Table C-2.

¹⁴³ *Original Investigations*, USITC Pub. 4998 at 25.

¹⁴⁴ *Original Investigations*, USITC Pub. 4998 at 25; *accord* CR/PR at Tables 1.6 & C-2. Subject imports' market share of 60.8 percent in interim 2019 was higher than their share of 55.7 percent in interim 2018. *Original Investigations*, USITC Pub. 4998 at 25; *accord* CR/PR at Table C-2.

¹⁴⁵ *Original Investigations*, USITC Pub. 4998 at 25–26.

¹⁴⁶ *Original Investigations*, USITC Pub. 4998 at 26; *accord* CR/PR at Tables 1.6 & C-2. Nonsubject imports' market share of 8.5 percent in interim 2019 was slightly higher than their share of 8.3 percent in interim 2018. *Original Investigations*, USITC Pub. 4998 at 26; *accord* CR/PR at Table C-2.

¹⁴⁷ CR/PR at Table 1.6. Lower domestic producer coverage in these reviews affects market share trends.

Producers provided a list of eleven known U.S. producers of threaded rod.¹⁴⁸ Domestic capacity decreased from *** pounds in 2018 to *** pounds in 2023.¹⁴⁹ Domestic Producers claim that the relief provided by the orders has allowed the domestic industry to expand production capacity and produce higher-quality products.¹⁵⁰ They also note that the domestic industry expanded to eleven producers during the POR with the addition of American Metal Group.¹⁵¹

Cumulated subject imports were the largest supplier of threaded rod to the U.S. market in 2023, accounting for *** percent of apparent U.S. consumption.¹⁵²

Nonsubject imports were the second-largest source of threaded rod in the U.S. market in 2023, accounting for *** percent of apparent U.S. consumption.¹⁵³ Japan, South Korea, and the United Arab Emirates were the three largest sources of nonsubject imports during the POR.¹⁵⁴ As discussed above, an antidumping duty order preexisting the orders under review has covered certain steel threaded rod from China since 2009.¹⁵⁵ Domestic Producers argue that nonsubject imports have “increased dramatically” since imposition of the orders and “would severely exacerbate the likely impact of increased volumes of low-priced imports from China, India, Taiwan, and Thailand if the orders were to be revoked.”¹⁵⁶

Responding purchaser *** reported that ***.¹⁵⁷ *** also reported that ***.¹⁵⁸

3. Substitutability and Other Conditions

Original Investigations. The Commission found that there was a high degree of substitutability between domestically produced threaded rod and subject imports.¹⁵⁹ The

¹⁴⁸ *Domestic Response*, Exhibit 2.

¹⁴⁹ CR/PR at Tables 1.4 & C-2. Lower domestic producer coverage in these reviews affects capacity trends.

¹⁵⁰ *Domestic Response* at 19. Domestic Producers claim that “the trade relief has allowed Vulcan to invest ***.” *Id.*

¹⁵¹ *Domestic Response* at 15–16, Exhibit 2. There were ten known domestic producers of threaded rod during the original investigations. See *Original Investigations*, USITC Pub. 4998 at III-1. Although American Metal Group was established in 2017, it did not begin producing threaded rod until 2021 and thus was not identified as a domestic producer during the original investigations. *Domestic Suppl. Resp.* at 2.

¹⁵² CR/PR at Table 1.6.

¹⁵³ CR/PR at Table 1.6.

¹⁵⁴ CR/PR at Table 1.5.

¹⁵⁵ See *Certain Steel Threaded Rod from the People’s Republic of China: Continuation of Antidumping Duty Order*, 85 Fed. Reg. 13625 (Mar. 9, 2020); accord CR/PR at Table 1.2.

¹⁵⁶ *Domestic Response* at 19.

¹⁵⁷ CR/PR at D.3. As mentioned above, ***.

¹⁵⁸ CR/PR at D.3.

¹⁵⁹ *Original Investigations*, USITC Pub. 4998 at 26.

Commission observed that all responding U.S. producers and a majority of importers and purchasers reported that U.S.-produced threaded rod and subject imports were always or frequently interchangeable.¹⁶⁰ Further, the Commission noted that majorities or pluralities of purchasers reported that domestically produced threaded rod and subject imports were comparable with respect to nearly all of 15 purchasing factors.¹⁶¹ The Commission also found that price was an important factor in purchasing decisions.¹⁶²

The Commission found that the raw materials were the largest component of the total cost of goods sold (“COGS”) for threaded rod and that the record indicated that raw material prices had increased as a share of total COGS over the POI.¹⁶³ The Commission also found that, although imports of threaded rod were not subject to duties imposed pursuant to section 232 of the Trade Expansion Act of 1962, inputs used to produce threaded rod were subject, which affected prices for both raw materials and finished threaded rod during the POI.¹⁶⁴ The record indicated that the vast majority of domestic producers’ and importers’ sales were on the spot market.¹⁶⁵

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, have changed since the original investigations. Domestic Producers argue that subject imports and the domestic like product remain highly substitutable and that price is still an important factor in purchasing decisions.¹⁶⁶ Accordingly, we find, as in the original investigations, that there is a high degree of substitutability between subject imports and the domestic like product and that price is an important factor in purchasing decisions.

Effective March 12, 2025, threaded rod from all subject countries became subject to an additional 25 percent *ad valorem* duty under section 232 of the Trade Expansion Act of 1962.¹⁶⁷ Effective September 24, 2018, threaded rod from China became subject to an additional 10

¹⁶⁰ *Original Investigations*, USITC Pub. 4998 at 26.

¹⁶¹ *Original Investigations*, USITC Pub. 4998 at 26.

¹⁶² *Original Investigations*, USITC Pub. 4998 at 27.

¹⁶³ *Original Investigations*, USITC Pub. 4998 at 27.

¹⁶⁴ *Original Investigations*, USITC Pub. 4998 at 27–28.

¹⁶⁵ *Original Investigations*, USITC Pub. 4998 at 28.

¹⁶⁶ *Domestic Response* at 13–14; *Domestic Final Comments* at 7–8.

¹⁶⁷ *Implementation of Duties on Steel Pursuant to Proclamation 10896, Adjusting Imports of Steel into the United States*, 90 Fed. Reg. 11249 (Mar. 5, 2025). As a result of these additional section 232 duties, threaded rod from all subject countries is exempt from the *ad valorem* reciprocal duties under the International Emergency Economic Powers Act (“IEEPA”). Exec. Order No. 14257, 90 Fed. Reg. 15041 (Apr. 7, 2025).

percent *ad valorem* duty under section 301 of the Trade Act of 1974, which increased to 25 percent on May 10, 2019.¹⁶⁸ Effective February 4, 2025, the President imposed an additional 10 percent *ad valorem* duty on threaded rod from China citing IEEPA, which increased to 20 percent on March 4, 2025.¹⁶⁹

C. Likely Volume of Subject Imports

Original Investigations. The Commission found that cumulated subject imports from China, India, Taiwan, and Thailand had a substantial and increasing presence in the U.S. market throughout the POI.¹⁷⁰ Subject imports increased from 179.0 million pounds in 2016 to 213.0 million pounds in 2017 and 264.2 million pounds in 2018, for a 47.6 percent increase between 2016 and 2018.¹⁷¹ Cumulated subject imports' share of apparent U.S. consumption increased from 50.5 percent in 2016 to 54.0 percent in 2017 and 59.5 percent in 2018.¹⁷² The Commission found that the volume of subject imports was significant both in absolute terms and relative to apparent U.S. consumption.¹⁷³

Current Reviews. The record indicates that subject imports maintained a presence in the U.S. market throughout the POR, while under the disciplining effect of the orders. Cumulated subject imports decreased from 218.4 million pounds in 2019 to 117.3 million pounds in 2020, then increased to 131.0 million pounds in 2021 and 153.8 million pounds in 2022, and then decreased to 149.2 million pounds in 2023.¹⁷⁴ Subject imports accounted for *** percent of apparent U.S. consumption in 2023, compared to 59.5 percent in 2018.¹⁷⁵

The record in these reviews contains limited information on the threaded rod industries in China, India, Taiwan, and Thailand. The available information indicates that subject

¹⁶⁸ CR/PR at 1.5.

¹⁶⁹ Exec. Order No. 14195, 90 Fed. Reg. 9121 (Feb. 7, 2025); Exec. Order No. 14228, 90 Fed. Reg. 11463 (Mar. 7, 2025); *Further Amended Notice of Implementation of Additional Duties on Products of the People's Republic of China Pursuant to the President's Executive Order 14195, Imposing Duties to Address the Synthetic Opioid Supply Chain in the People's Republic of China*, 90 Fed. Reg. 11426 (Mar. 6, 2025).

¹⁷⁰ *Original Investigations*, USITC Pub. 4998 at 28–29.

¹⁷¹ *Original Investigations*, USITC Pub. 4998 at 28; *accord* CR/PR at Tables 1.6 & C-2. Cumulated subject imports of 139.1 million pounds in interim 2019 were 22.3 percent higher than the 113.7 million pounds in interim 2018. *Original Investigations*, USITC Pub. 4998 at 28; CR/PR at Table C-2.

¹⁷² *Original Investigations*, USITC Pub. 4998 at 28; *accord* CR/PR at Tables 1.6 & C-2. Cumulated subject imports' 60.8 percent share of apparent U.S. consumption in interim 2019 was higher than their 55.7 percent share in interim 2018. *Original Investigations*, USITC Pub. 4998 at 28; *accord* CR/PR at Table C-2.

¹⁷³ *Original Investigations*, USITC Pub. 4998 at 29.

¹⁷⁴ CR/PR at Table 1.5; *accord Domestic Response*, Exhibit 2.

¹⁷⁵ CR/PR at Table 1.6 & C-2; *Original Investigations*, USITC Pub. 4998 at 28.

producers have the ability and incentive to export subject merchandise to the U.S. market at significant volumes if the orders were revoked.¹⁷⁶ Domestic Producers provided a list of 48 possible producers and exporters of threaded rod in the four subject countries and submitted information from several of those companies' websites indicating that subject producers possess substantial capacity and focus on export markets.¹⁷⁷

The information available also indicates that the Chinese, Indian, Taiwan, and Thai industries are large exporters. According to GTA data, China and Taiwan were the two leading global exporters of threaded screws and bolts under HS subheading 7318.15, including threaded rod and out-of-scope products, throughout the POR, accounting for 31.3 and 11.1 percent of global exports in 2023, respectively.¹⁷⁸ India was among the top ten largest exporters throughout the POR, accounting for 2.8 percent of global exports in 2023.¹⁷⁹ These data also indicate that in 2023, exports of such merchandise were 3.9 billion pounds from China, 353.2 million pounds from India, 1.4 billion pounds from Taiwan, and 251.1 million pounds from Thailand, for a total of 5.9 billion pounds of exports.¹⁸⁰

The record also indicates that the U.S. market remains attractive to subject producers. Cumulated subject imports maintained a substantial presence in the U.S. market during the POR, accounting for *** percent of apparent U.S. consumption in 2023, indicating that they have maintained active, sizable distribution networks and customers in the United States.¹⁸¹ According to GTA data, in 2023, the United States was the largest destination market for Chinese and Taiwan exports of threaded screws and bolts under HS subheading 7318.15, which includes threaded rod and out-of-scope products, and the second largest destination for exports of such merchandise from India and Thailand.¹⁸²

¹⁷⁶ Additionally, in the original investigations, *** of five responding subject producers reported being able to shift production between threaded rod and out-of-scope products. *Original Investigations*, USITC Pub. 4998 at Table II-5; *Original Investigations Confidential Report* at Table II-5. Nevertheless, *** Indian firms reported producing *** pounds of out-of-scope products on the same machinery used to produce threaded rod in 2016, *** pounds in 2017, and *** in 2018, for shares of ***, ***, and *** percent of their total production in those years, respectively. *Original Investigations Confidential Report* at Table VII-5. Accordingly, the record shows at least some ability of subject producers to shift production of out-of-scope products to in-scope threaded rod.

¹⁷⁷ *Domestic Response* at 8–12, Exhibits 5–9.

¹⁷⁸ CR/PR at Table 1.12.

¹⁷⁹ CR/PR at Table 1.12. Thailand fell just outside of the top 10 exporting countries with 2.0 percent (or 251.1 million pounds) of global exports in 2023, compared to tenth-largest South Korea's 2.3 percent (or 290.7 million pounds). See *id.* at Tables 1.11 & 1.12.

¹⁸⁰ CR/PR at Tables 1.8–1.12.

¹⁸¹ CR/PR at Table 1.6.

¹⁸² CR/PR at Tables 1.8–1.11. Subject imports have not been subject to other antidumping or countervailing duty investigations outside the United States. *Id.* at 1.22.

Given the foregoing, including the significant volume and market share of cumulated subject imports during the original investigations, the continued presence of cumulated subject imports in the U.S. market during the POR while under the disciplining effect of the orders, the available information about the threaded rod industries in the subject countries, and the attractiveness of the U.S. market, we find that the volume of cumulated subject imports would likely be significant, both in absolute terms and relative to consumption in the United States, if the orders were revoked.¹⁸³

D. Likely Price Effects

Original Investigations. Quarterly pricing data indicated that subject imports undersold the domestic like product in 180 of 271 quarterly comparisons, or 66.4 percent of the time, at margins ranging from 0.1 to 41.3 percent.¹⁸⁴ The volume of subject imports in quarters with underselling (98.9 million pounds) was substantially larger than the volume in quarters with overselling (13.6 million pounds).¹⁸⁵

The Commission also considered lost sales information. Twenty-two of 35 responding purchasers reported purchasing subject imports rather than the domestic like product and that subject import prices were lower, and 14 of those purchasers reported that price was a primary reason for purchasing 23.4 million pounds of subject imports rather than the domestic like product.¹⁸⁶ Based on the foregoing, the Commission found subject import underselling to be

¹⁸³ Although subject imports from all sources are subject to additional duties under section 232 and subject imports from China are subject to additional duties under section 301 and IEEPA, neither Domestic Producers nor the responding purchaser indicated that these duties would prevent subject imports from entering the U.S. market at significant levels if the orders were revoked. *See generally Domestic Response*; CR/PR at D.3 (with the responding purchaser stating generally, however, that ***). With respect to the section 301 duties on threaded rod from China, which first became effective in September 2018, subject imports from China initially declined between 2019 and 2020, but then increased 48.4 percent from 2020 to 2023 and accounted for *** percent of apparent U.S. consumption in 2023. CR/PR at Tables 1.5 & 1.6. Given these facts, as well as the available information about the threaded rod industries in the subject countries and the attractiveness of the U.S. market, we find that the additional duties on subject imports from all sources under section 232 and the additional duties on subject imports from China under section 301 and IEEPA would not likely prevent subject imports from entering the U.S. market at significant levels if the orders were revoked.

The record of these expedited reviews contains no information concerning inventories of subject merchandise.

¹⁸⁴ *Original Investigations*, USITC Pub. 4998 at 30.

¹⁸⁵ *Original Investigations*, USITC Pub. 4998 at 30.

¹⁸⁶ *Original Investigations*, USITC Pub. 4998 at 30. Although 14 purchasers reported that price was a primary reason for purchasing subject imports rather than domestically produced threaded rod, only 10 of those purchasers estimated the quantity of the lower priced subject imports that they purchased instead of the domestic like product. *Id.* at V-23. The 23.4 million pounds of subject imports (Continued...)

significant.¹⁸⁷ As a result of this underselling, the Commission found that the domestic industry lost *** percentage points of market share from 2016 to 2018 and *** percentage points between interim 2018 and interim 2019 to cumulated subject imports.¹⁸⁸

The Commission also considered trends in pricing for the domestic like product and subject imports and found that prices for threaded rod from all sources generally increased during the POI.¹⁸⁹ Consequently, the Commission found that cumulated subject imports did not depress prices of the domestic like product to a significant degree.¹⁹⁰

The Commission found that the domestic industry's ratio of COGS to net sales increased during the full years of the POI, but was lower in interim 2019 than in interim 2018.¹⁹¹ The Commission observed that net sales values on a per-pound basis rose generally with per-pound raw material costs from 2016 to 2018 and that net sales values per pound increased more than the per-pound raw material costs in interim 2019 as compared with interim 2018.¹⁹² The Commission found that there was little correlation between changes in the ratio of COGS to net sales and changes in subject import volumes, noting that the deterioration in the ratio of COGS to net sales occurred mainly from 2016 to 2017, although the increase in cumulated subject import volume was greater from 2017 to 2018 than from 2016 to 2017.¹⁹³ The Commission also observed that the ratio of COGS to net sales was lower in interim 2019 than in interim 2018, notwithstanding that cumulated subject import volume and market share were higher in interim 2019 than in interim 2018.¹⁹⁴ The Commission therefore determined that there was insufficient evidence on the record to find that subject imports prevented price increases that otherwise would have occurred to a significant degree.¹⁹⁵

purchased by these 10 purchasers accounted for 13.4 percent of the reported 174.7 million pounds in subject imports purchased by responding purchasers during the POI. *Id.* at Tables V-11 to V-13.

¹⁸⁷ *Original Investigations*, USITC Pub. 4998 at 31.

¹⁸⁸ *Original Investigations*, USITC Pub. 4998 at 30–31; *Confidential Views* at 32.

¹⁸⁹ *Original Investigations*, USITC Pub. 4998 at 31.

¹⁹⁰ *Original Investigations*, USITC Pub. 4998 at 31.

¹⁹¹ *Original Investigations*, USITC Pub. 4998 at 31–32. Specifically, the Commission found that the domestic industry's ratio of COGS to net sales increased from *** percent in 2016 to *** percent in 2017 and *** percent in 2018; the ratio of *** percent in interim 2019 was lower than the ratio of *** percent in interim 2018. *Id.*; *Confidential Views* at 33.

¹⁹² *Original Investigations*, USITC Pub. 4998 at 32. Specifically, the Commission found that net sales values rose \$*** per pound between 2016 and 2018, while the net values of raw materials rose \$*** per pound during the same period. *Id.* at 32 n.149; *Confidential Views* at 33 n.149. The Commission also found that net sales values rose \$*** per pound between interim 2018 and interim 2019, while net values of raw materials rose \$*** per pound. *Id.*

¹⁹³ *Original Investigations*, USITC Pub. 4998 at 32.

¹⁹⁴ *Original Investigations*, USITC Pub. 4998 at 32.

¹⁹⁵ *Original Investigations*, USITC Pub. 4998 at 32.

The Commission concluded that significant underselling by cumulated subject imports led to lost sales and shifts in market share from the domestic industry to subject imports and thus had significant adverse price effects on the domestic industry.¹⁹⁶

Current Reviews. As discussed above, we have found that there is a high degree of substitutability between domestically produced threaded rod and subject imports and that price is an important factor in purchasing decisions for threaded rod.

The record in these expedited reviews does not contain new product-specific pricing information. Based on the available information, including the high degree of substitutability between the domestic like product and subject imports and the importance of price in purchasing decisions, we find that, if the orders were revoked, significant volumes of subject imports would likely undersell the domestic like product to a significant degree, as they did in the original investigations. Absent the discipline of the orders, the significant volumes 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 restrain price increases necessary to cover any increasing costs, thereby depressing or suppressing prices for the domestic like product. Consequently, we find that if the orders were revoked, subject imports would likely have significant price effects.

E. Likely Impact

Original Investigations. The Commission found that, although most of the domestic industry's trade and employment indicators improved from 2016 to 2018, they lagged far behind the substantial 25.3 percent increase in apparent U.S. consumption during the same period and occurred while the industry had substantial excess capacity.¹⁹⁷ The Commission also found that the domestic industry's profitability declined as it lost market share to lower priced subject imports.¹⁹⁸ Accordingly, the Commission determined that cumulated subject imports had a significant adverse impact on the domestic industry during the POI.¹⁹⁹

Considering the role of nonsubject imports, the Commission found that nonsubject imports' share of the market declined during most of the POI and showed little variation between the interim periods.²⁰⁰ Consequently, the Commission concluded that nonsubject imports did not explain the domestic industry's loss of market share during the POI.²⁰¹

¹⁹⁶ *Original Investigations*, USITC Pub. 4998 at 33.

¹⁹⁷ *Original Investigations*, USITC Pub. 4998 at 34–36, 37.

¹⁹⁸ *Original Investigations*, USITC Pub. 4998 at 34, 36–37.

¹⁹⁹ *Original Investigations*, USITC Pub. 4998 at 37.

²⁰⁰ *Original Investigations*, USITC Pub. 4998 at 37–38.

²⁰¹ *Original Investigations*, USITC Pub. 4998 at 38.

*Current Reviews.*²⁰² The record in these expedited reviews contains limited information concerning the domestic industry's performance since the original investigations. The information available indicates that the domestic industry's trade indicators declined, although trends in capacity, production, U.S. shipments, and market share are affected by lower domestic producer coverage in these reviews. The domestic industry's capacity of *** pounds, production of *** pounds, and capacity utilization of *** percent were all lower in 2023 than in 2018.²⁰³ The domestic industry's U.S. shipments of *** pounds and *** percent share of apparent U.S. consumption were also lower in 2023 than in 2018.²⁰⁴

The domestic industry's financial performance under the orders largely improved in 2023 compared to its performance in 2018, the last full year examined in the original investigations, although trends in net sales revenue, gross profit, and operating income are affected by lower domestic producer coverage in these reviews. The domestic industry's net sales revenue of \$*** in 2023 was lower than in 2018.²⁰⁵ The industry's gross profit of \$***, operating income of \$***, and operating margin of *** percent, however, were all higher in 2023 than in 2018.²⁰⁶ This limited information is insufficient for us to make a finding as to whether the domestic industry is vulnerable to the continuation or recurrence of material injury in the event of revocation of these orders.²⁰⁷

²⁰² In its expedited reviews of the antidumping duty orders, Commerce determined that revocation of the orders would likely result in the continuation or recurrence of dumping, with margins of up to 59.45 percent for China, 28.34 percent for India, 32.26 percent for Taiwan, and 20.83 percent for Thailand. *Alloy and Certain Carbon Steel Threaded Rod from the People's Republic of China: Final Results of the Expedited First Sunset Review of the Antidumping Duty Order*, 90 Fed. Reg. 10812 (Feb. 27, 2025); *Carbon and Alloy Steel Threaded Rod from India, Taiwan, and Thailand: Final Results of the Expedited First Sunset Reviews of the Antidumping Duty Orders*, 90 Fed. Reg. 11701 (Mar. 11, 2025). Commerce also determined that revocation of the countervailing duty orders on threaded rod from China and India would likely result in the continuation or recurrence of countervailing subsidies at rates up to 69.20 percent and 211.72 percent, respectively. *Carbon and Alloy Steel Threaded Rod from India and the People's Republic of China: Final Results of the Expedited First Sunset Review of the Countervailing Duty Orders*, 90 Fed. Reg. 11708 (Mar. 11, 2025).

²⁰³ CR/PR at Tables 1.4 & C-2. In 2018, the domestic industry's capacity and production were *** and *** pounds, respectively, with a capacity utilization of *** percent. *Id.*

²⁰⁴ CR/PR at Tables 1.4, 1.6 & C-2. In 2018, the domestic industry's U.S. shipments were *** pounds, with a *** percent share of apparent U.S. consumption. *Id.*

²⁰⁵ CR/PR at Tables 1.4 & C-2. The domestic industry's net sales were \$*** in 2018. *Id.*

²⁰⁶ CR/PR at Table 1.4 & Table C-2. In 2018, the domestic industry's gross profit was \$***, with an operating income of \$*** and operating margin of *** percent. *Id.*

²⁰⁷ We acknowledge Domestic Producers' argument that overall demand for threaded rod decreased between 2018 and 2023 while total imports of threaded rod increased in 2024, placing the domestic industry in a vulnerable condition. *Domestic Response* at 19–20. We note, however, that the (Continued...)

Based on the information available on the record, we find that revocation of the orders would likely result in a significant volume of cumulated subject imports 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 in purchasing decisions, significant volumes of low-priced cumulated subject imports would likely 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 low-priced cumulated subject imports and their adverse price effects would likely have a significant adverse impact on the production, shipments, sales, market share, and revenues of the domestic industry, which, in turn, would have a direct adverse impact on the industry's profitability and employment, as well as its ability to raise capital and make and maintain necessary capital investments. We thus conclude that, if the orders were revoked, cumulated subject imports from China, India, Taiwan, and Thailand would be likely to have a significant adverse impact on the domestic industry within a reasonably foreseeable time.

We have also considered the role of factors other than subject imports, including the presence of nonsubject imports. The information available indicates that nonsubject imports have substantially increased their presence in the U.S. market since the original investigations, increasing their share of apparent U.S. consumption from 8.4 percent in 2018 to *** percent in 2023.²⁰⁸ The record provides no indication, however, that the presence of nonsubject imports would prevent cumulated subject imports from significantly increasing their presence in the U.S. market after revocation. In light of the high degree of substitutability between subject imports and the domestic like product and the importance of price to purchasers, the significant volume of low-priced cumulated subject imports that we have found likely after revocation would likely take market share from the domestic industry, as well as from nonsubject imports. In this regard, we also note that the increased presence of nonsubject imports in the U.S. market did not prevent the domestic industry from improving its financial

domestic industry's financial performance improved by several metrics between 2018 and 2023, despite the decline in demand. Regardless, as discussed above, the domestic producer coverage is lower in these reviews than in the original investigations, and no subject importers responded to the Commission's notice of institution. Accordingly, the record in these reviews does not contain information sufficient to assess the vulnerability of the domestic industry.

²⁰⁸ *Original Investigations*, USITC Pub. 4998 at 26; CR/PR at Tables 1.6 & C-2. The volume of nonsubject imports increased overall during the POR, increasing from 48.3 million pounds in 2019 to 86.0 million pounds in 2020, 90.6 million pounds in 2021, and 123.7 million pounds in 2022, before decreasing to 94.1 million pounds in 2023. CR/PR at Table 1.5.

performance in 2023 compared to 2018.²⁰⁹ Consequently, we find that any future effects of nonsubject imports would not preclude the likely effects attributable to subject imports.

V. Conclusion

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

²⁰⁹ CR/PR at Tables 1.4 & C-2.

Information obtained in these reviews

Background

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 antidumping and countervailing duty orders on carbon and alloy steel threaded rod (“threaded rod”) from China, India, Taiwan, and Thailand 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:

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

Effective date	Action
November 1, 2024	Notice of initiation by Commission (89 FR 87409)
November 4, 2024	Notice of institution by Commerce (89 FR 87543)
February 4, 2025	Commission’s vote on adequacy
February 27 and March 11, 2025	Commerce’s results of its expedited reviews
June 16, 2025	Commission’s determinations and views

¹ 19 U.S.C. 1675(c).

² 89 FR 87409, 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.

The original investigations

The original investigations resulted from petitions filed on February 21, 2019, with Commerce and the Commission by Vulcan Threaded Products Inc. (“Vulcan”), Pelham, Alabama.⁵

On October 21, 2019, Commerce determined that imports of threaded rod from Thailand were being sold at less than fair value (“LTFV”).⁶ The Commission determined on December 5, 2019, that the domestic industry was materially injured by reason of LTFV imports of threaded rod from Thailand.⁷ On December 13, 2019, Commerce issued its antidumping order on imports from Thailand with a final weighted-average dumping margin of 20.83 for all exporters and producers.⁸

On December 9, 2019, Commerce determined that imports of threaded rod from Taiwan were being sold at LTFV.⁹ The Commission determined on January 23, 2020, that the domestic industry was materially injured by reason of LTFV imports of threaded rod from Taiwan.¹⁰ On February 5, 2020, Commerce issued its antidumping duty order on imports from Taiwan with a final weighted-average dumping margin of 32.26 for all exporters and producers.¹¹

On February 18, 2020, Commerce determined that imports of threaded rod from China and India were being sold at less than fair value (“LTFV”) and subsidized by the governments of China and India.¹² The Commission determined on April 3, 2020, that the domestic industry was materially injured by reason of LTFV and subsidized imports of threaded rod from China and India.¹³ On April 9, 2020, Commerce issued its antidumping and countervailing duty orders on

⁵ Carbon and Alloy Steel Threaded Rod from Thailand (Final), USITC Publication 4998, December 2019. (“Original Thailand publication”) p. 1.1. Carbon and Alloy Steel Threaded Rod from Taiwan (Final), USITC Publication 5013, January 2020 (“Original Taiwan publication”), p. 1.1. Carbon and Alloy Steel Threaded Rod from China and India (Final), USITC Publication 5040, April 2020 (“Original China and India publication”), p. 1.1.

⁶ 84 FR 56162, October 21, 2019.

⁷ 84 FR 67476, December 10, 2019. The Commission also found that imports subject to Commerce’s affirmative critical circumstances determination were not likely to undermine seriously the remedial effect of the order on Thailand.

⁸ 84 FR 68108, December 13, 2019.

⁹ 84 FR 67258, December 9, 2019.

¹⁰ 85 FR 5237, January 29, 2020.

¹¹ 85 FR 6512, February 5, 2020.

¹² 85 FR 8818, 85 FR 8821, 85 FR 8828, and 85 FR 8833, February 18, 2020.

¹³ 85 FR 19774 April 8, 2020.

imports of threaded rod from China and India with final weighted-average dumping margins ranging from 4.26 to 59.45 percent for China and 2.75 to 28.34 percent for India and net subsidy rates ranging from 31.02 to 66.81 percent for China and 6.07 to 211.72 percent for India.¹⁴

Previous and related investigations

The Commission has conducted a previous import relief investigations on threaded rod or similar merchandise, as presented in table I-2.

Table 1.2 Threaded rod: Previous and related Commission proceedings and current status

Date	Number	Country	ITC original determination	Current status
2008	731-TA-1145	China	Affirmative	Order continued after second review in 2020
2013	701-TA-498	India	Negative	N/A
2013	731-TA-1213	India	Negative	N/A
2013	731-TA-1214	Thailand	Negative	N/A

Source: U.S. International Trade Commission publications and Federal Register notices.

Note: “Date” refers to the year in which the investigation was instituted by the Commission.

Commerce’s five-year reviews

Commerce announced that it would conduct expedited reviews with respect to the orders on imports of threaded rod from China, India, Taiwan, and Thailand with the intent of issuing the final results of these reviews based on the facts available not later than March 3, 2025.¹⁵ Commerce publishes its Issues and Decision Memoranda and its final results concurrently, accessible upon publication at <https://access.trade.gov/public/FRNoticesListLayout.aspx> 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,

¹⁴ 85 FR 19925, 85 FR 19927, and 85 FR 19929, April 9, 2020.

¹⁵ Letter from Howard Smith, Acting Director, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, December 26, 2024.

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 and countervailing duty orders on imports of threaded rod from China, India, Taiwan, and Thailand are noted in the sections titled “The original investigations” and “U.S. imports,” if applicable.

The product

Commerce’s scope

Commerce has defined the scope as follows:

The merchandise covered by the scope of this order is carbon and alloy steel threaded rod. Steel threaded rod is certain threaded rod, bar, or studs, of carbon or alloy steel, having a solid, circular cross section of any diameter, in any straight length. Steel threaded rod is normally drawn, cold-rolled, threaded, and straightened, or it may be hot-rolled. In addition, the steel threaded rod, bar, or studs subject to these investigations are non-headed and threaded along greater than 25 percent of their total actual length. A variety of finishes or coatings, such as plain oil finish as a temporary rust protectant, zinc coating (i.e., galvanized, whether by electroplating or hot-dipping), paint, and other similar finishes and coatings, may be applied to the merchandise.

Steel threaded rod is normally produced to American Society for Testing and Materials (ASTM) specifications ASTM A36, ASTM A193 B7/B7m, ASTM A193 B16, ASTM A307, ASTM A320 L7/L7M, ASTM A320 L43, ASTM A354 BC and BD, ASTM A449, ASTM F1554-36, ASTM F1554-55, ASTM F1554 Grade 105, American Society of Mechanical Engineers (ASME) specification ASME B18.31.3, and American Petroleum Institute (API) specification API 20E. All steel threaded rod meeting the physical description set forth above is covered by the scope of this order, whether or not produced according to a particular standard.

Subject merchandise includes material matching the above description that has been finished, assembled, or packaged in a third country, including by cutting, chamfering, coating, or painting the threaded rod, by attaching the threaded rod to, or packaging it with, another product, or any other finishing, assembly, or packaging operation that would not otherwise remove the merchandise from the scope of this order if performed in the country of manufacture of the threaded rod.

Carbon and alloy steel threaded rod are also included in the scope of this order whether or not imported attached to, or in conjunction with, other parts and accessories such as nuts and washers. If carbon and alloy steel threaded rod are imported attached to, or in

conjunction with, such non-subject merchandise, only the threaded rod is included in the scope.

Excluded from the scope of this order is: (1) threaded rod, bar, or studs which are threaded only on one or both ends and the threading covers 25 percent or less of the total actual length; and (2) stainless steel threaded rod, defined as steel threaded rod containing, by weight, 1.2 percent or less of carbon and 10.5 percent or more of chromium, with or without other elements.

Specifically excluded from the scope of this order is threaded rod that is imported as part of a package of hardware in conjunction with a ready-to-assemble piece of furniture.¹⁶

U.S. tariff treatment

Threaded rod is currently imported under Harmonized Tariff Schedule of the United States (“HTSUS” or “HTS”) statistical reporting numbers 7318.15.5051, 7318.15.5056, and 7318.15.5090. The general rate of duty is “Free” for HTS subheadings 7318.15.50.¹⁷ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Effective September 24, 2018, threaded rod originating in China became subject to an additional 10 percent ad valorem duty under section 301 of the Trade Act of 1974. Effective May 10, 2019, the section 301 duty for imports under this subheading was increased to 25 percent ad valorem.¹⁸

¹⁶ 84 FR 68108, December 13, 2019; 85 FR 6511, February 5, 2020; 85 FR 19925, April 9, 2020; 85 FR 19929, April 9, 2020; and 85 FR 19927, April 9, 2020. Effective November 20, 2024, Commerce issued final results of changed circumstances reviews of the AD order on alloy and certain carbon steel threaded rod and the CVD order on carbon and alloy steel threaded rod from China to revoke the orders, in part, with respect to certain wheel studs. For a full description of the wheel studs that are excluded from the scope of the China AD and CVD orders, see 89 FR 91676, November 20, 2024.

¹⁷ The merchandise subject to these reviews may also be imported under the following HTS statistical reporting numbers: 7318.15.2095 and 7318.19.0000. USITC, HTSUS (2024) Revision 10, Publication 5569, November 2024, pp. 73.34, 73.35.

¹⁸ 83 FR 47974, September 21, 2018; 84 FR 20459, May 9, 2019. See also HTS heading 9903.88.03 and U.S. notes 20(e) and 20(f) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTSUS (2024) Revision 10, USITC Publication 5569, November 2022, pp. 73.45, 99-III.28–99-III.29, 99-III.48, 99-III-251–99-III-255, 99-III.318–99-III-326. Goods exported from China to the United States prior to May 10, 2019, and entering the United States prior to June 1, 2019, were not subject to the escalated 25 percent duty (84 FR 21892, May 15, 2019).

Description and uses¹⁹

Threaded rod is generally threaded along its entire length and is produced from low-carbon, medium-carbon, or alloy steel wire rod or bar.²⁰ Threaded rod is primarily used in commercial construction to suspend electrical conduits; pipes for plumbing; heating, ventilation, and air-conditioning ductwork; and sprinkler systems for fire protection, among other applications. Normally, one end of the threaded rod is fastened to the ceiling and the other end is fastened to the support for suspending the conduits, pipes, ductwork, or sprinkler system. Threaded rod is also used for hanging suspended ceilings and elevated conveyor belts, and for joint restraint systems for underground piping. It is also used in structural tie downs in earthquake- and hurricane-restraint systems for roofing. Threaded rod can also be used as a headless screw in general fastener applications or for bolting together pipe joints.

The threaded rod subject to these investigations is normally produced to ASTM International specifications ASTM A36,²¹ ASTM A193 B7/B7m, ASTM 193 B16,²² ASTM A307,²³ ASTM A320 L7/L7M, ASTM A320 L43,²⁴ ASTM A354 BC and BD,²⁵ ASTM A449,²⁶ ASTM F I 554-

¹⁹ Unless otherwise noted, this information is based on Original Thailand publication, pp. 1.16 to 1.17.

²⁰ Low carbon rod has a carbon content between 0.04 and 0.3 percent. Medium- and high-carbon rod have a carbon content between 0.3 and 1 percent. Ultra-high carbon rod has a carbon content above 1 percent. The majority of all threaded rod produced in the United States is of low-carbon content and is produced by thread rolling. Some companies have capability to thread-roll medium-carbon rod for use in applications where strength is an important factor, such as in the petroleum, machinery, or automobile industries.

²¹ This is the standard specification for carbon structural steel. ASTM International, ASTM A36/A36-19," <https://www.astm.org/Standards/A36.htm>, (accessed August 28, 2019).

²² ASTM A193 specifications generally cover alloy and stainless steel bolting intended for high temperature or high pressure service and other special purpose applications. ASTM International, "ASTM A193 / A193M – 17," <https://www.astm.org/Standards/A193.htm>, (accessed January 10, 2025).

²³ Standard specification for carbon steel bolts, studs, and threaded rod 60,000 PSI tensile strength. ASTM International, "Standard Specification for Carbon Steel bolts, Studs, and Threaded Rod 60 000 PSI Tensile Strength," <https://www.astm.org/Standards/A307.htm>, (accessed January 10, 2025).

²⁴ A320 standard specifications generally apply to alloy and stainless steel bolting for low temperature services. ASTM International, "ASTM A320 / A320M – 18," <https://www.astm.org/Standards/A320.htm>, (accessed January 10, 2025).

²⁵ A354 standard specifications generally apply to quenched and tempered alloy steel bolts, studs, and other externally threaded fasteners. ASTM International, "ASTM A354 - 17e2," <https://www.astm.org/Standards/A354.htm>, (accessed January 10, 2025).

²⁶ A449 standard specification applies to hex cap screws, bolts and studs, steel, heat treated, 120/105/90 ksi minimum tensile strength, general use. ASTM International, "ASTM A449 – 14," <https://www.astm.org/Standards/A449.htm>, (accessed January 10, 2025).

36, ASTM F1554-55, ASTM F1554 Grade 105,²⁷ American Society of Mechanical Engineers ("ASME") specification ASME B18.31.3,²⁸ and American Petroleum Institute ("API") specification API 20E.²⁹

Manufacturing process³⁰

Threaded rod is produced from carbon and alloy steel wire rod (in coils), or from steel bar (in straight lengths) for applications that require a larger diameter. Regardless of whether steel wire rod or bar is used, the production process is the same. The manufacturing process begins with the removal of surface scale (descaling). The wire rod or bar is then cold drawn through a series of dies, each one smaller than the preceding one, to reduce the rod or bar diameter to the required final size. The resulting rod is straightened and cut to the desired length, most often into 8- and 10-foot sections. Next, the rod sections are fed through a threading machine, which forms the threaded grooves along the entire length, or only part of the length, by rolling the rod between a pair of grooved dies (i.e. thread rolling).

Certain threaded rod can be heat-treated³¹ either before or after it is threaded. Depending on the intended end use of the final product, threaded rod also can be coated with a plain oil finish during the threading process, galvanized using either a zinc plating³² or a hot-dip

²⁷ F1554 standard specifications apply to anchor bolts, steel, 36, 55, and 105-ksi yield strength.

²⁸ ASME standard specification for square, hex, heavy hex, and askew head bolts. Also covers hex, heavy hex, hex flange, lobed head, and lag screws. ASME, "B18.2.1-2012," <https://www.asme.org/codes-standards/find-codes-standards/b18-2-1-square-hex-heavy-hex-askew-head-bolts-hex-heavy-hex-hex-flange-lobed-head-lag-screws>, (accessed January 10, 2025).

²⁹ API SPEC 20E covers alloy and carbon steel bolting used in the petroleum and natural gas industries. Techstreet, "API SPEC 20E," https://www.techstreet.com/standards/api-spec-20e?product_id=1944354, (accessed January 10, 2025).

³⁰ Unless otherwise noted, this information is based on Original Thailand publication, pp. 1.17 to 1.18.

³¹ Heat treatment is a process by which metal is heated (or cooled) to change its microstructure, thereby enhancing certain physical and mechanical characteristics. Heat treating is commonly used to improve strength, hardness, and corrosion resistance. Wojes, Ryan. "Here's What Happens When Metals Undergo Heat Treatment." The Balance, February 6, 2019. <https://www.thebalance.com/what-happens-when-metals-undergo-heat-treatment-2340016>.

³² Zinc plating is a processed used to protect iron and steel product against corrosion. It involves the electrodeposition of a thin coating of zinc metal onto the surface of the product. This coating creates a barrier that prevents rusting on the underlying metal. Sharrett Plating, "The Zinc Plating Process," <https://www.sharrettsplating.com/blog/the-zinc-plating-process/>, (accessed January 10, 2025).

galvanizing³³ process, or coated with other finishes such as paint or epoxy coatings—all processes which impart corrosion resistance.³⁴ Once the final coating or plating has been applied, the threaded rod is then packaged in cardboard tubes, or in bundles if sold in larger quantities. During the original investigations, one producer noted that threaded rod can also be sold in burlap wrap, which is preferred by certain customers in the western United States because it creates little to no dunnage (cushioning material).³⁵

³³ Hot-dip galvanizing is a process by which fabricated steel is dipped into a kettle or vat containing molten zinc. During this process, the steel reacts with molten zinc to produce a tightly-bonded alloy coating that enhances the corrosion resistance abilities of the steel. American Galvanizers Association, “What is Galvanizing,” <https://galvanizeit.org/hot-dip-galvanizing/what-is-galvanizing>, (accessed January 10, 2025).

³⁴ Most galvanized threaded rod is zinc electroplated. Hot-dipped galvanized finishes are less common, but are used to prevent corrosion and rust. All America Threaded Products, “Threaded 101: Finishes,” <https://www.aatprod.com/Resources/Blogs/Threaded101-Finishes>, (accessed January 10, 2025).

³⁵ Dunnage generally refers to packaging components such as boards, blocks, planks, metal, or plastic bracing used to support and secure products while they are being shipped and handled. Universal Packaging, “What is Dunnage,” September 20, 2017, <https://www.universalpackage.com/universal-package-blog/what-is-dunnage>.

The industry in the United States

U.S. producers

During the final phase of the original investigations, the Commission received U.S. producer questionnaires from nine firms, which accounted for the vast majority of production of threaded rod in the United States during 2018.³⁶

In response to the Commission’s notice of institution in these current reviews, domestic interested parties provided a list of eleven known and currently operating U.S. producers of threaded rod. Two firms providing U.S. industry data in response to the Commission’s notice of institution accounted for approximately *** percent of production of threaded rod in the United States during 2023.³⁷

Recent developments

Table 1.3 presents events in the U.S. industry since the Commission’s original investigations.³⁸

Table 1.3 Threaded rod: Developments in the U.S. industry

Item	Firm	Event
New Producer	AMG	2021— American Metal Group (“AMG”) reportedly began producing steel threaded rod.

Source: Domestic producers’ supplemental response to the notice of institution, (December 16, 2024) p. 2.

³⁶ Original Thailand publication, p. I.5.

³⁷ Domestic interested parties’ response to the notice of institution, December 12, 2024, p. 18.

³⁸ For recent developments, if any, in tariff treatment, please see “U.S. tariff treatment” section.

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 1.4 presents a compilation of the trade and financial data submitted from all responding U.S. producers in the original investigations.

Table 1.4 threaded rod: Trade and financial data submitted by U.S. producers, by period

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; ratio in percent

Item	Measure	2016	2017	2018	2023
Capacity	Quantity	***	***	***	***
Production	Quantity	***	***	***	***
Capacity utilization	Ratio	***	***	***	***
U.S. shipments	Quantity	***	***	***	***
U.S. shipments	Value	***	***	***	***
U.S. shipments	Unit value	***	***	***	***
Net sales	Value	***	***	***	***
COGS	Value	***	***	***	***
COGS to net sales	Ratio	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***
SG&A expenses	Value	***	***	***	***
Operating income or (loss)	Value	***	***	***	***
Operating income or (loss) to net sales	Ratio	***	***	***	***

Source: For the years 2016 to 2018, data are compiled using data submitted in the Commission's original investigations. For the year 2023, data are compiled using data submitted by domestic interested parties. Domestic interested parties' response to the notice of institution exhibit 1.

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

Note: In the original investigations, the Commission excluded certain U.S. producers (***) that were related parties from the domestic industry. Thus, data presented in this table for the years 2016 to 2018 are based on table C-2 of the original Thailand publication, which excluded *** and *** U.S. producer questionnaire.

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.³⁹

In its original determinations, the Commission defined the domestic industry to include all U.S. producers of carbon and alloy steel threaded rod, with the exceptions of certain U.S. producers that were excluded from the domestic industry as related parties. One Commissioner defined the domestic industry differently.⁴⁰ In its original determinations, the Commission defined a single domestic like product consisting of carbon and alloy steel threaded rod, coextensive with Commerce's scope.⁴¹ In 2023, U.S. producer *** accounted for *** percent of total subject imports from *** and its subject imports were equivalent to *** percent of the quantity of its U.S. production of threaded rod. One of eleven domestic producers of threaded rod, *** accounted for *** percent of U.S. production in 2023.

U.S. importers

During the final phase of the original investigations, the Commission received U.S. importer questionnaires from 57 firms, which accounted for approximately 58.6 percent of total U.S. imports, *** percent of U.S. imports from China, *** percent of U.S. imports from India, *** percent of U.S. imports from Taiwan, and *** percent of U.S. imports from Thailand, of threaded rod, during 2018.⁴² Import data presented in the original investigations are based on official import statistics.

³⁹ Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).

⁴⁰ The Commission excluded *** from the domestic industry as related parties. Chairman Johanson did not find that appropriate circumstances existed to exclude *** from the domestic industry as a related party. Original confidential views for Thailand, p. 13.

⁴¹ 89 FR 87409, November 1, 2024.

⁴² Carbon and Alloy Steel Threaded Rod from China, India, Taiwan, and Thailand (Final), Confidential Report, INV-RR-112, November 4, 2019 (“Original confidential Thailand report”), p. 4.1.

In its response to the notice of institution for these current reviews, one importer of the subject merchandise provided data regarding its U.S. imports and U.S. shipments (see appendix B). In addition, the domestic interested parties provided a list of 64 firms that may currently import subject merchandise.⁴³

U.S. imports

Table 1.5 presents the quantity, value, and unit value of U.S. imports from China, India, Taiwan, and Thailand as well as the other top sources of U.S. imports (shown in descending order of 2023 imports by quantity).

⁴³ Domestic interested parties' response to the notice of institution, December 2, 2024, exh. 10.

Table 1.5 Threaded rod: U.S. imports, by source and period

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound

U.S. imports from	Measure	2019	2020	2021	2022	2023
China	Quantity	98,240	33,502	30,843	45,940	49,728
China (AD)	Quantity	97,446	33,268	30,392	45,178	48,946
India	Quantity	76,586	68,241	82,706	89,391	86,993
Taiwan	Quantity	37,209	15,511	17,377	18,417	12,445
Thailand	Quantity	6,385	50	40	24	21
Subject sources	Quantity	218,420	117,304	130,966	153,772	149,188
South Korea	Quantity	6,916	16,950	12,964	21,550	18,874
United Arab Emirates	Quantity	7,033	23,367	24,475	25,803	16,585
Japan	Quantity	7,786	6,093	7,541	9,877	12,435
All other sources	Quantity	26,596	39,570	45,662	66,469	46,197
Nonsubject sources	Quantity	48,332	85,980	90,642	123,700	94,091
All import sources	Quantity	266,752	203,284	221,608	277,472	243,280
China	Value	95,776	35,242	40,344	62,865	60,089
China (AD)	Value	94,648	34,587	39,617	61,529	58,473
India	Value	41,105	34,531	48,419	72,325	57,183
Taiwan	Value	46,622	29,953	36,445	46,745	29,533
Thailand	Value	3,215	383	70	73	102
Subject sources	Value	186,717	100,109	125,278	182,008	146,906
South Korea	Value	12,716	21,859	21,376	38,876	31,673
United Arab Emirates	Value	3,769	12,345	15,996	20,641	10,163
Japan		28,307	21,431	25,996	26,979	24,526
All other sources	Value	77,318	70,737	90,383	128,188	110,926
Nonsubject sources	Value	122,111	126,372	153,751	214,684	177,287
All import sources	Value	308,828	226,481	279,029	396,692	324,193
China	Unit value	1.0	1.1	1.3	1.4	1.2
China (AD)	Unit value	1.0	1.0	1.3	1.4	1.2
India	Unit value	0.5	0.5	0.6	0.8	0.7
Taiwan	Unit value	1.3	1.9	2.1	2.5	2.4
Thailand	Unit Value	0.5	7.6	1.8	3.0	4.8
Subject sources	Unit value	0.9	0.9	1.0	1.2	1.0
South Korea	Unit value	1.8	1.3	1.6	1.8	1.7
United Arab Emirates	Unit value	0.5	0.5	0.7	0.8	0.6
Japan	Unit value	3.6	3.5	3.4	2.7	2.0
All other sources	Unit value	2.9	1.8	2.0	1.9	2.4
Nonsubject sources	Unit value	2.5	1.5	1.7	1.7	1.9
All import sources	Unit value	1.2	1.1	1.3	1.4	1.3

Source: Compiled from official Commerce statistics for HTS statistical reporting numbers 7318.15.5051, 7318.15.5056, and 7318.15.5090, accessed December 10, 2024. Rows labeled "China AD" exclude imports that entered under HTS statistical reporting number 7318.15.5056 (non-alloy threaded rod), as imports of carbon-quality threaded rod from China are subject to an existing antidumping duty order and are thus excluded from the scope of the China AD order in this proceeding. These data may be overstated as HTS statistical reporting numbers may contain products outside the scope of these reviews.

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

Cumulation considerations⁴⁴

In assessing whether imports should be cumulated in five-year reviews, the Commission considers, among other things, whether there is a likelihood of a reasonable overlap of competition among subject imports and the domestic like product. Additional information concerning geographical markets and simultaneous presence in the market is presented below.⁴⁵

Imports of threaded rod from China, India, and Taiwan were reported in all 60 months from 2019 to 2023. Imports from Thailand were reported in 31 of the 60 months from 2019 and 2023.

Imports of threaded rod from China, India, and Taiwan entered through all four borders of entry in all years from 2019 to 2023. Imports of threaded rod from Thailand entered through all four borders in 2019 and 2020; through all borders of entry except the western border in 2021; through only the southern border in 2022, and through only the eastern and southern borders in 2023.

⁴⁴ Unless otherwise noted, this information is based on official U.S. import statistics for HTS statistical reporting numbers 73.1815.5051, 73.1815.5056, and 73.1815.5090.

⁴⁵ In addition, available information concerning subject country producers and the global market is presented in the next section of this report.

Apparent U.S. consumption and market shares

Table 1.6 presents data on U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares.

Table 1.6 Threaded rod: 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
Included U.S. producers	Quantity	***	***	***	***
China	Quantity	63,613	93,971	133,300	49,728
India	Quantity	61,126	70,416	74,301	86,993
Taiwan	Quantity	42,155	38,184	44,861	12,445
Thailand	Quantity	12,096	10,415	11,783	21
Subject sources	Quantity	178,989	212,986	264,245	149,188
Nonsubject sources	Quantity	42,521	38,521	37,497	94,091
All import sources	Quantity	221,510	251,507	301,742	243,280
Apparent U.S. consumption	Quantity	354,680	394,751	444,476	***
Included U.S. producers	Value	***	***	***	***
China	Value	51,503	73,439	116,514	60,089
India	Value	26,516	32,026	39,741	57,183
Taiwan	Value	43,350	48,481	54,191	29,533
Thailand	Value	5,202	4,933	6,084	102
Subject sources	Value	126,570	158,878	216,530	146,906
Nonsubject sources	Value	105,335	100,476	104,728	177,287
All import sources	Value	231,905	259,354	321,258	324,193
Apparent U.S. consumption	Value	***	***	***	***
Included U.S. producers	Share of quantity	***	***	***	***
Excluded U.S. producers	Share of quantity	***	***	***	***
All U.S. producers	Share of quantity	37.5	36.3	32.1	***
China	Share of quantity	17.9	23.8	30.0	***
India	Share of quantity	17.2	17.8	16.7	***
Taiwan	Share of quantity	11.9	9.7	10.1	***

Source	Measure	2016	2017	2018	2023
Thailand	Share of quantity	3.4	2.6	2.7	***
Subject sources	Share of quantity	50.5	54.0	59.5	***
Nonsubject sources	Share of quantity	12.0	9.8	8.4	***
All import sources	Share of quantity	62.5	63.7	67.9	***
Included U.S. producers	Share of value	***	***	***	***
Excluded U.S. producers	Share of value	***	***	***	***
All U.S. producers	Share of value	29.9	29.7	27.6	***
China	Share of value	15.6	19.9	26.3	***
India	Share of value	8.0	8.7	9.0	***
Taiwan	Share of value	13.1	13.1	12.2	***
Thailand	Share of value	1.6	1.3	1.4	***
Subject sources	Share of value	38.3	43.1	48.8	***
Nonsubject sources	Share of value	31.9	27.2	23.6	***
All import sources	Share of value	70.1	70.3	72.4	***

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 numbers 7318.15.5051, 7318.15.5056, and 7318.15.5090, accessed December 10, 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. Zeroes, null values, and undefined calculations are suppressed and shown as em dashes (—).

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 in 2018, the Commission issued foreign producers' or exporters' questionnaires to 211 firms believed to produce and/or export threaded rod from China. None of these firms submitted questionnaire responses.⁴⁶

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 28 possible producers and exporters of threaded rod in China.⁴⁷

Recent developments

Table 1.7 presents events in the Chinese industry since the Commission's original investigations.

Table 1.7 Threaded rod: Developments in the Chinese industry

Item	Firm	Event
Plant opening	Ningbo Dongxin	June 2024— Ningbo Dongxin announced the beginning of operations at a newly constructed facility.
Expansion	Cooper & Turner (Nigbo)	April 2020— Cooper & Turner (Nigbo) announced the investment into building a new 18,000 square meter manufacturing and distribution facility located in Haiyan, Jiaying Prefecture, Zhejiang Province. No further information was provided on the anticipated opening date of that facility.

Source: Ningbo Dongxin high-Strength Nut Co., LTD, "New facility is running 2024-06-13," June 25, 2024, <https://www.d-x.com.cn/New-factory-is-running-2024-06-13-id40764476.html>;
Cooper Turner Beck, "Cooper Turner Beck Participates in Signing Ceremony of Key Foreign Investment Projects in Zhejiang Province Extending its Commitment to China Market," April 23, 2020, <https://www.cooperandturner.co.uk/news/key-foreign-investment-projects-in-china/>.

Exports

Table 1.8 presents export data for threaded screws and bolts, a category that includes threaded rod and out-of-scope products, from China (by export destination in descending order of quantity for 2023). The United States was the leading destination market, accounting for 14

⁴⁶ Original Thailand publication, p. 7.3.

⁴⁷ Domestic interested parties' response to the notice of institution, December 2, 2024, exh.5.

percent of China’s worldwide export quantity, followed by Russia (6 percent), which together accounted for 20 percent of the total in that year.

Table 1.8 Threaded screws and bolts: exports from China, by destination and period

Quantity in 1,000 pounds

Destination market	2019	2020	2021	2022	2023
United States	549,242	459,622	534,666	688,408	549,442
Russia	230,192	192,814	218,640	193,256	225,752
Japan	165,202	140,770	158,348	171,004	163,966
South Korea	88,966	87,492	102,648	121,872	150,978
Mexico	88,672	85,650	109,124	121,598	144,624
Vietnam	102,018	117,264	125,360	126,466	135,722
United Arab Emirates	77,830	77,302	70,612	96,942	123,716
Germany	126,306	150,510	178,876	158,868	121,324
Thailand	65,578	65,072	71,324	81,066	116,834
India	77,448	53,672	68,472	90,160	116,674
All other markets	1,887,718	1,803,328	2,012,480	1,973,364	2,028,592
All markets	3,459,172	3,233,496	3,650,550	3,823,004	3,877,624

Source: Official exports statistics under HS subheading 7318.15 as reported by China Customs in the Global Trade Atlas database, accessed December 16, 2024

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

The industry in India

Producers in India

During the final phase of the original investigations, the Commission received usable foreign producer/exporter questionnaires from four firms. These firms’ exports to the United States accounted for 41.8 percent of U.S. imports of threaded rod from India in 2018.⁴⁸

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 nine possible producers and exporters of threaded rod in India.⁴⁹

⁴⁸ Original Thailand publication, p. 7.7.

⁴⁹ Domestic interested parties’ response to the notice of institution December 2, 2024, exh. 5.

Recent developments

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

Exports

Table 1.9 presents export data for threaded screws and bolts, a category that includes threaded rod and out-of-scope products, from India (by export destination in descending order of quantity for 2023). The Netherlands was the leading destination market, accounting for 13 percent of India's worldwide export quantity, followed by the United States (11 percent), Germany (10 percent), and Saudi Arabia (10 percent), which together accounted for 44 percent of the total in that year.

Table 1.9 Threaded screws and bolts: exports from India, by destination and period

Quantity in 1,000 pounds

Destination market	2019	2020	2021	2022	2023
Netherlands	25,164	21,204	46,890	53,722	46,302
United States	22,198	21,406	46,470	56,518	38,512
Germany	47,380	25,568	38,824	49,238	36,940
Saudi Arabia	15,766	13,422	21,508	30,782	35,326
United Kingdom	35,610	25,620	37,796	33,242	26,890
Poland	6,648	3,940	10,550	19,642	19,842
United Arab Emirates	8,460	10,474	18,798	14,710	17,484
Italy	15,242	8,754	19,444	15,464	17,404
Spain	5,246	4,134	11,030	15,204	12,504
France	4,814	2,974	6,348	10,264	8,096
All other markets	95,722	73,582	93,440	95,936	93,902
All markets	282,250	211,078	351,098	394,722	353,202

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 7318.15, accessed December 16, 2024. These data may be overstated as HS subheading 7318.15 may contain products outside the scope of these reviews.

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

The industry in Taiwan

Producers in Taiwan

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 threaded rod in Taiwan during 2018, and approximately *** percent of threaded rod exports from Taiwan to the United States during 2018.⁵⁰

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 10 possible producers and exporters of threaded rod in Taiwan.⁵¹

Recent developments

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

Exports

Table 1.10 presents export data for threaded screws and bolts, a category that includes threaded rod and out-of-scope products, from Taiwan (by export destination in descending order of quantity for 2023). The United States was the leading destination market, accounting for 48 percent of Taiwan's worldwide export quantity, followed by Germany (9 percent), which together accounted for 57 percent of the total in that year.

⁵⁰ Original confidential Thailand report, p. 7.14.

⁵¹ Domestic interested parties' response to the notice of institution, December 2, 2024, exh .5.

Table 1.10 Threaded screws and bolts: exports from Taiwan, by destination and period

Quantity in 1,000 pounds

Destination market	2019	2020	2021	2022	2023
United States	819,946	756,198	813,934	878,142	667,822
Germany	168,154	144,744	168,006	177,250	124,040
Japan	113,410	95,108	92,676	94,932	70,580
Netherlands	60,726	48,966	65,174	74,114	58,310
China	22,244	29,604	47,990	38,150	35,136
United Kingdom	68,452	46,274	59,716	49,010	33,130
Italy	41,856	30,680	36,286	52,122	30,052
Thailand	31,294	31,984	36,330	27,162	27,964
Poland	42,672	32,634	40,872	36,900	26,062
Spain	30,428	18,548	26,100	31,196	25,780
All other markets	426,890	353,078	404,756	407,726	281,762
All markets	1,826,072	1,587,818	1,791,840	1,866,704	1,380,638

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 7318.15, accessed December 16, 2024. These data may be overstated as HS subheading 7318.15 may contain products outside the scope of these reviews.

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

The industry in Thailand

Producers in Thailand

During the final phase of the original investigations the Commission sent out foreign producer/exporter questionnaires to five firms believed to produce threaded rod in Thailand. The Commission received no foreign producer/exporter questionnaire responses from firms in Thailand.⁵²

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested parties provided a name of one possible producer and exporter of threaded rod in Thailand.⁵³

⁵² Original publication, p. 7.19.

⁵³ Domestic interested parties' response to the notice of institution, December 2, 2024, exh. 5.

Recent developments

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

Exports

Table 1.11 presents export data for threaded screws and bolts, a category that includes threaded rod and out-of-scope products, from Thailand (by export destination in descending order of quantity for 2023). Germany was the leading destination market, accounting for 24 percent of Thailand's worldwide export quantity, followed by the United States (15 percent), which together accounted for 39 percent of the total in that year.

Table 1.11 Threaded screws and bolts: exports from Thailand, by destination and period

Quantity in 1000 pounds

Destination market	2019	2020	2021	2022	2023
Germany	58,020	45,018	53,194	53,114	60,552
United States	47,692	43,998	53,266	58,600	37,146
Netherlands	12,526	12,740	13,944	18,932	20,238
India	14,126	6,482	7,004	17,654	20,142
Italy	10,334	9,350	10,344	20,848	13,740
Poland	1,410	986	1,494	5,264	11,420
Argentina	5,826	4,406	7,018	7,704	7,812
South Korea	6,610	5,502	6,882	6,780	7,454
Indonesia	9,320	5,562	8,528	9,614	7,442
South Africa	6,760	6,332	9,186	6,332	6,704
All other markets	67,874	57,140	68,746	69,854	58,456
All markets	240,498	197,516	239,606	274,696	251,106

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 7318.15, accessed December 16, 2024. These data may be overstated as HS subheading 7318.15 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, threaded rod from China, India, Taiwan and Thailand has not been subject to other antidumping or countervailing duty investigations outside the United States.

The global market

Table 1.12 presents global export data for threaded screws and bolts, a category that includes threaded rod and out-of-scope products (by source in descending order of quantity for 2023). Total global exports of threaded screws and bolts increased by 2 percent between 2019 and 2023 yet increased by 14 percent from 2020 to 2023. China accounted for the largest share of global exports, by volume, in 2023 (31 percent), followed by Taiwan (11 percent), and Germany (8 percent).

Table 1.12 Threaded screws and bolts: global exports by country and period

Quantity in 1,000 pounds

Exporting country	2019	2020	2021	2022	2023
China	3,459,172	3,233,496	3,650,550	3,823,004	3,877,624
Taiwan	1,826,072	1,587,818	1,791,840	1,866,704	1,380,638
Germany	1,054,260	933,440	1,051,804	1,006,702	1,015,678
Mexico	92,382	70,652	83,648	83,602	946,458
United States	1,153,504	913,200	848,400	729,642	821,552
Italy	696,940	588,456	684,762	780,516	745,034
Netherlands	303,002	261,702	318,932	408,890	462,918
Japan	457,896	378,960	462,156	433,178	402,722
India	282,250	211,078	351,098	394,722	353,202
South Korea	302,978	260,376	289,408	305,086	290,672
All other exporters	2,518,112	2,175,942	2,760,924	2,409,894	2,100,196
All exporters	12,146,568	10,615,120	12,293,522	12,241,940	12,396,694

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 7318.15, accessed December 16, 2024. These data may be overstated as HS subheading 7318.15 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 87409, November 1, 2024	Carbon and Alloy Steel Threaded Rod From China, India, Taiwan, and Thailand; Institution of Five-Year Reviews	https://www.govinfo.gov/content/pkg/FR-2024-11-01/pdf/2024-25100.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 one submission in response to its notice of institution in the subject reviews. It was filed on behalf of two domestic producers of threaded rod: Bay Standard Manufacturing Inc. (“Bay Standard”) and Vulcan Threaded Products Manufacturing (“Vulcan”) (collectively referred to herein as “domestic interested parties”). ***.¹

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 Threaded rod: Summary of responses to the Commission’s notice of institution

Interested party type	Number	Coverage
U.S. producer	2	***%
U.S. importer (India)	1	***%

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

Note: The U.S. importer coverage figure is the estimated share of the quantity of total U.S. imports of threaded rod from *** in 2023 accounted for by U.S. producer and importer ***. The estimate was calculated as the quantity of reported imports (***) divided by the quantity of total U.S. imports from *** reported for 2023 in Commerce’s official import statistics (***) pounds). Domestic interested parties’ response to the notice of institution, December 2, 2024, exh. 1.

¹ ***. Domestic interested parties response to the notice of institution, December 2, 2024, p. 16.

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 the domestic interested parties. The domestic interested parties request that the Commission conduct expedited reviews of the antidumping and countervailing duty orders on threaded rod.²

Company-specific information

RESPONSE CHECKLIST FOR U.S. PRODUCERS

Table B.2 Threaded rod: 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	Vulcan	Bay Standard
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	NA	NA
Trade/financial data	Yes	Yes
Changes in supply/demand	Yes	Yes
Complete response	Yes	Yes

² Domestic interested parties' comments on adequacy, January 2, 2025, p. 2.

Table B.3 Threaded rod: Response checklist for U.S. importers from ***

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

Item	Bay Standard
Nature of operation	Yes
Statement of intent to participate	Yes
Statement of likely effects of revoking the order	Yes
U.S. producer list	Yes
U.S. importer/foreign producer list	Yes
List of 3-5 leading purchasers	Yes
List of sources for national/regional prices	NA
Trade data	Yes
Changes in supply/demand	Yes
Complete response	Yes

APPENDIX C

SUMMARY DATA COMPILED IN PREVIOUS PROCEEDINGS

Related party exclusion

Table C-2

Threaded rod: Summary data concerning the U.S. market excluding three U.S. producers ***, 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. consumption quantity:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Producers' share (fn1):									
Included producers.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Excluded producers.....	***	***	***	***	***	▲***	▲***	▲***	▼***
All producers.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Importers' share (fn1):									
China.....	***	***	***	***	***	▲***	▲***	▲***	▲***
India.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Taiwan.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Thailand.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▼***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. consumption value:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Producers' share (fn1):									
Included producers.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Excluded producers.....	***	***	***	***	***	▲***	▲***	▼***	▼***
All producers.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Importers' share (fn1):									
China.....	***	***	***	***	***	▲***	▲***	▲***	▲***
India.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Taiwan.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Thailand.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▼***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. imports from:									
China:									
Quantity.....	63,613	93,971	133,300	52,150	62,059	▲109.6	▲47.7	▲41.9	▲19.0
Value.....	51,503	73,439	116,514	45,917	58,590	▲126.2	▲42.6	▲58.7	▲27.6
Unit value.....	\$0.81	\$0.78	\$0.87	\$0.88	\$0.94	▲8.0	▼(3.5)	▲11.8	▲7.2
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▲***	▲***
India									
Quantity.....	61,126	70,416	74,301	35,389	47,593	▲21.6	▲15.2	▲5.5	▲34.5
Value.....	26,516	32,026	39,741	18,011	25,809	▲49.9	▲20.8	▲24.1	▲43.3
Unit value.....	\$0.43	\$0.45	\$0.53	\$0.51	\$0.54	▲23.3	▲4.8	▲17.6	▲6.5
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Taiwan									
Quantity.....	42,155	38,184	44,861	20,590	23,786	▲6.4	▼(9.4)	▲17.5	▲15.5
Value.....	43,350	48,481	54,191	25,465	27,142	▲25.0	▲11.8	▲11.8	▲6.6
Unit value.....	\$1.03	\$1.27	\$1.21	\$1.24	\$1.14	▲17.5	▲23.5	▼(4.9)	▼(7.7)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Thailand									
Quantity.....	12,096	10,415	11,783	5,617	5,695	▼(2.6)	▼(13.9)	▲13.1	▲1.4
Value.....	5,202	4,933	6,084	2,904	2,809	▲17.0	▼(5.2)	▲23.3	▼(3.3)
Unit value.....	\$0.43	\$0.47	\$0.52	\$0.52	\$0.49	▲20.1	▲10.1	▲9.0	▼(4.6)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Subject sources:									
Quantity.....	178,989	212,986	264,245	113,746	139,133	▲47.6	▲19.0	▲24.1	▲22.3
Value.....	126,570	158,878	216,530	92,297	114,349	▲71.1	▲25.5	▲36.3	▲23.9
Unit value.....	\$0.71	\$0.75	\$0.82	\$0.81	\$0.82	▲15.9	▲5.5	▲9.8	▲1.3
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Nonsubject sources:									
Quantity.....	42,521	38,521	37,497	16,884	19,527	▼(11.8)	▼(9.4)	▼(2.7)	▲15.7
Value.....	105,335	100,476	104,728	48,969	57,667	▼(0.6)	▼(4.6)	▲4.2	▲17.8
Unit value.....	\$2.48	\$2.61	\$2.79	\$2.90	\$2.95	▲12.7	▲5.3	▲7.1	▲1.8
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
All import sources:									
Quantity.....	221,510	251,507	301,742	130,630	158,660	▲36.2	▲13.5	▲20.0	▲21.5
Value.....	231,905	259,354	321,258	141,265	172,016	▲38.5	▲11.8	▲23.9	▲21.8
Unit value.....	\$1.05	\$1.03	\$1.06	\$1.08	\$1.08	▲1.7	▼(1.5)	▲3.2	▲0.3
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***

Table C-2--Continued

Threaded rod: Summary data concerning the U.S. market excluding three U.S. producers ***; 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		2018	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.....	***	***	***	***	***	▼***	▼***	▼***	▲***	
Production quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***	
Capacity utilization (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***	
U.S. shipments:										
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***	
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
Export shipments:										
Quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
Value.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
Inventories/total shipments (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***	
Production workers.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
Hours worked (1,000s).....	***	***	***	***	***	▲***	▲***	▼***	▲***	
Wages paid (\$1,000).....	***	***	***	***	***	▲***	▲***	▲***	▲***	
Hourly wages (dollars per hour).....	***	***	***	***	***	▲***	▲***	▲***	▲***	
Productivity (pounds per hour).....	***	***	***	***	***	▲***	▼***	▲***	▼***	
Unit labor costs.....	***	***	***	***	***	▲***	▲***	▼***	▲***	
Net sales:										
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***	
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
Cost of goods sold (COGS).....	***	***	***	***	***	▲***	▲***	▲***	▲***	
Gross profit or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▲***	
SG&A expenses.....	***	***	***	***	***	▼***	▼***	▼***	▲***	
Operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▲***	
Net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▲***	
Capital expenditures.....	***	***	***	***	***	▲***	▲***	▼***	▲***	
Unit COGS.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
Unit SG&A expenses.....	***	***	***	***	***	▼***	▼***	▼***	▲***	
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▲***	
Unit net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▲***	
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***	
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***	
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***	

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 from data submitted in response to Commission questionnaires and official U.S. import statistics using statistical reporting numbers 7318.15.5051,7318.15.5056 and 7318.15.5090 accessed September 23, 2019.

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 threaded rod: ***. Purchaser questionnaires were sent to these four firms and one firm (***) submitted a response to the Commission’s request for information.

1. Have there been any significant changes in the supply and demand conditions for threaded rod that have occurred in the United States or in the market for threaded rod in China, India, Taiwan and/or Thailand since December 13, 2019?

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

2. Do you anticipate any significant changes in the supply and demand conditions for threaded rod in the United States or in the market for threaded rod in China, India, Taiwan and/or Thailand within a reasonably foreseeable time?

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

